IRISH
NATURA & HILL FARMERS
ASSOCIATION (INHFA)

Delivering for Suckler and Sheep Farmers

INHFA Submission
on Carbon Budgets & Climate Action
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Introduction

When assessing future carbon budgets and requirements to address the threat posed by climate change it is vital that we consider all aspects relating to this. The development of any such plan cannot just focus on carbon output but must also include what farms hold in stock and are sequestering. Otherwise, as has been the effect of current and past agricultural policy, there is a risk of depletion of existing stocks as well as the additional sequestration potential. This can only be achieved by developing a method to accurately measure the ongoing footprint of all farms activities so that a fair and balanced debate may take place.

Carbon Accountancy

In developing a thorough carbon accountancy system, we will be in a position to address any issues impacting on farming; based on verifiable science and not on opinion. The model required needs to recognise all the contributing factors such as fuel costs, fertiliser, plastic use, grain etc. including the embedded carbon costs from imported products as detailed in the Life Cycle Approach (LCA). In factoring in this we will also need to recognise mitigating factors such as soil type, grassland, trees, hedgerow, other ecological features and stocking density. The development of model such as this must be a priority for Government and relevant state bodies such as Teagasc.

Carbon Leakage

When developing such a model it is vital that we also consider the impact of carbon leakage. Unfortunately, this factor hasn't featured in the ongoing discussion around climate change and must be part of any solution in addressing climate change. After all this is a global problem and the idea of reducing agricultural output in one country (where the carbon footprint on the product is low) and replacing this output in another country with a higher carbon footprint does not make sense. How we act locally will have an impact globally.

Low Input Farming Systems

Over the last number of years, there has been a sustained and unfair briefing against the suckler beef sector. This has translated into efforts to significantly reduce our national suckler herd. Regrettably, this seems to be having an impact as we have seen a 20% fall in suckler numbers over the last number of years. This undue negative focus on suckler cows is a clear indication of the need

for a carbon accountancy model. The Irish suckler sector is predominately an extensive, low input system with many positive characteristics in terms of environmental good and the sustainable management of carbon. This is something that has been researched and detailed in an EU Commission Report titled *'Grazing for Carbon'* which was published in September 2018.

When addressing the issue of carbon budgets and our response to climate change, low-input farming systems that dominates our hills and large parts of our lowlands must not become an easy target as we push to balance these budgets. The farms concerned are delivering both in terms of farming output and for our environment which will be verified once a proper carbon accountancy practice becomes established and continue to be the bedrock of rural communities.

Land Use Policy

In the Climate Action Plan announced last November there are radical proposals to change land use. When assessing these proposals, we note that they will impact more acutely where suckler and sheep farming enterprises dominates i.e. our hills and on heavy peaty soils. As part of this policy, there are proposals to significantly increase forestry cover and to commence a major re-wetting programme that will target drained peat lands. We have major reservations with both proposals.

In relation to forestry, where Sitka Spruce has been the main crop there needs to be a full reassessment of its environmental impact; with the pausing of its use while this reassessment is conducted. In outlining our forestry policy to the Department of Agriculture Food and Marine we have recommended a radical change in policy towards one that is farmer-centred. This policy would incentivise the planting of a portion of the farm with environmentally friendly native woodlands or commercial hardwoods. By adopting such a policy, we can develop a new narrative of trees on the farm instead of trees replacing the farm. In doing this we can provide farmers with another income source while helping our environment and addressing climate change. The forestry policy outlined will need exchequer support on a similar annual basis to what is currently in place; but this support will need to run to at least thirty years.

On the rewetting of farmed peatlands, we have major reservations that this will deliver in terms of carbon sequestration. We note that a report has already been presented to the Joint Oireachtas Committee on Agriculture detailing how the rewetting of these lands will actually increase carbon emissions in the first number of years. However, if the State want to pursue this then one possible option is to conduct this on existing State lands with a second option to reassess the replanting of trees on carbon rich soils that have been clear-felled (*the replanting of forestry is a current requirement under State payments made when the forest was initially established).* Currently, first-time planting is not allowed on these soils, yet private foresters are required by the State to replant them under the Afforestation Scheme.

Carbon Ownership

The whole notion of carbon farming and carbon trading is new to all parties involved. There is growing anxiety in the farming community for the lack of a participative forum to discuss and develop the potential of a carbon market. Farmers are the key stakeholder when it comes to the assets of farm. Farmers must be reassured that there will be a full recognition that the farmer owns the stock of carbon attributable to that farm through the aforementioned carbon accountancy model. Farmers must be part of the ongoing discussion in developing carbon markets and their various manifestations.