

Ref: 080222.

8 February, 2022.

Climate Division – Carbon Budgets,
Department of the Environment, Climate and Communications,
29-31 Adelaide Road,
Dublin,
D02 X285.

Re: CCAC's carbon budget letter to Minister Ryan and the technical report.

Dear Sir/Madam,

The ICMSA, Irish Creamery and Milk Suppliers Association, is a national farm organisation that represents all farmers, particularly dairy and livestock farmers. ICMSA places emphasis on preserving the family farm structure and defending the rights and incomes of farm families. In relation to the current Carbon Budget, ICMSA is very concerned that potential additional regulations will place increased regulatory requirements and financial burdens on farmers.

The following is ICMSA's response to specific aspects of the CCAC's carbon budget letter to Minister Ryan and the accompanying technical report:

3.1.2 Agriculture

- ICMSA believes that agriculture should be addressed as a whole and having specific proposals to target specific sub-sectors is not the correct course of action. In general, agriculture sub-sectors are integrated and the budget needs to recognise this.
- When a farmer is carrying out an activity on their land that is sequestering carbon, the climate accountancy system must recognise this sequestration and the farmer rewarded for his/her efforts.
- ICMSA does not support a national herd reduction as Ireland is one of the most carbon efficient producers of dairy and beef in the world. If Ireland reduces its beef and dairy production, this will lead to other countries importing more dairy products and beef from less efficient producers which will lead to carbon leakage.
- It is quite clear that science and technology is progressing rapidly and mechanisms to reduce methane per animal will be developed. This must be recognised in terms of

planning for future reduction in methane and no knee jerk reactions should be taken that will damage Ireland's agriculture competitive advantage.

- Diversification options that will deliver a viable income from farming are extremely limited. There is no farming sector that can generate the same return as dairy farming. Land type and climate dictates that grass based systems are the most efficient economic farming models in almost of Ireland.

3.1.3 Land Use, Land use Change and Forestry

- ICMSA believes that the net-net accounting system for LULUCF should remain in place as it is extremely important to have a baseline and the net-net system provides this.
- **Forestry**
 - A complete review of Irelands forestry policy needs to be undertaken as farmers will not plant their land under the current policy.
 - ICMSA believes that planting 20,000 ha of forestry per annum from 2028 up to 2050 is completely unrealistic and needs to be reviewed.
- **Rewetting**
 - The rewetting of peatlands must not undermine the productive capacity of neighbouring farmers who chose not to rewet their land.
 - There must be a clear policy put in place to protect farmers/landowners from their land becoming damaged due to the rewetting of neighbouring land. History has shown that famers/landowners have not been protected in similar situations.

3.2.3 Employment Implications:

- ICMSA has serious concerns in relation to the implementation of the 'Just Transition' which clearly has not worked to date with the midlands being a good example with the ending of peat harvesting by Bord na Mona.
- It is clear from this report that any reduction in bovine agricultural activity will lead to a lower agricultural output, lower agricultural incomes, a reduction in employment in the agricultural sector, the food processing industry and rural areas. The suggested scenarios within the Carbon Budget to reduce emissions will lead to the loss of up to 45,000 jobs within the agri-food sector. ICMSA strongly believes that there should be grants made available to all farmers of any scale in particular dairy farmers who need or want to invest in additional environmental infrastructure to allow them to farm in a more carbon efficient manner and the focus must be to improve our carbon efficiency in terms of unit of output.
- ICMSA supports the statement that additional resources should be allocated to support necessary investment in innovation, research, and knowledge transfer to enable the long term climate sustainability and resilience of Irish agriculture and land use.

The agri-food sector is Irelands' most important indigenous industry which plays a vital role in our national and particularly rural economy. The sector is critical to the fabric of Irelands' rural communities. The sustainability of Irelands' food production system is recognised

worldwide; Ireland has a world famous grass-based production system producing both beef and dairy products that are exported to over 180 countries across the world. The sector accounts for 8% of all employment in Ireland, 10% of national exports are agri-food based and is our largest sector in terms of net foreign earnings. Any reduction in bovine activity will be seriously detrimental to the agricultural sector in turn having a very negative impact on Irelands' rural communities and national economy. ICMSA believes that Ireland's agriculture emissions can be reduced through the adoption of the Teagasc MACC curve and through increased investment and research into additional mitigation measures and by promoting environmental methods of farming through appropriate incentives.

Your sincerely,

A large black rectangular redaction box covers the signature and name of the sender.