

From: [REDACTED]@icos.ie>
Sent: Tuesday 8 February 2022 12:03
To: CARBON BUDGET CONSULTATION
Subject: Response by the Irish Co-operative Organisation Society (ICOS)

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To whom it may concern,

From the outset, the Irish Co-operative Organisation Society - ICOS wishes to clearly acknowledge the importance of taking significant action to reduce the amount of greenhouse gas emissions in the atmosphere. We recognize the principle that all countries and economic sectors must contribute to the effort to limit global warming and devastating climate change, in line with the Paris Agreement.

ICOS represents a range of co-operative businesses owned by farmers including the dairy and livestock sectors. We believe the new target of reducing emissions by -51% by 2030, now embedded in legislation is extremely challenging for all economic sectors, especially agriculture given our unique emissions profile and given that the majority of emissions from agriculture are from biological sources.

In general, we acknowledge that the Climate Advisory Council (CCAC) faced a difficult task in setting out the specifics of the rolling 5-year carbon budgets. We agree that a 7% per annum reduction in the first 5-years is inappropriate, and that the approach by the CCAC provides for the opportunity to avail of new technologies and innovation to come on stream later in the decade. However, that said, it is important to avoid a cliff edge approach to policy making in the event of underachievement.

It is important that Government acknowledges the collaborative approach by the agri-food sector via the development of the Food Vision 2020 Report in August 2021; a new 10-year strategy for the sector with sustainability and a food-systems approach the denominating theme. ICOS is now participating in the Food Vision Dairy Group, under the chair of Prof Gerry Boyle, the former director of Teagasc. The group is tasked with stabilizing and reducing emissions from the dairy sector. We are committed to playing a constructive role as part of the newly formed group. However, we stress the importance of protecting the competitiveness of the economy as required under the Act, especially the agri-food sector which operates within an international context and the need to support productivity and reasonable growth within the sector, as no industry can standstill and remain viable against the backdrop of rising input costs and inflationary pressures. We also stress that an integrated approach across the livestock sectors will be needed.

In correspondence sent to Minister Ryan on the 4th of October we outlined our deep concern with respect to the adoption of the Gross Net method of calculating greenhouse gas emissions. We believe this was an unnecessary step given that the implementation of this approach will not be required until 2026. We also express concern that despite specific references to the treatment of biogenic methane and carbon leakage in the Act, the CCAC has chosen not to provide any detailed analysis into both issues of concern to the farming and agri-food sector. This undermines confidence and has generated confusion and uncertainty.

It is important to outline that the agri-food sector is to the fore in demonstrating leadership on climate action and sustainability, such as support for the Teagasc Signpost Programme, the Agricultural Sustainability Support and Advisory Programme and individual co-op programmes and initiatives. Appropriate funding and new public policies supportive of the agri-food sector will have to be forthcoming to enable farmers and the wider sector transition to meet the targets established by the State.

Kind Regards,