

The Minister for Environment, Climate and Communications,  
Department of the Environment, Climate and Communications.

Re: Consultation on Carbon Budgets

Date 04 February 2022

Dear Minister Ryan,

With reference to Irish agriculture and its wider implications, I submit that considerable technical assessment and costing are required before firming up on carbon budgets, based on the CCAC report. I wish to draw attention to the following issues:

(a) Exchange of agricultural output for forestry output

The report states that a 51% curtailment of agricultural emissions would involve major changes in land use regarding agriculture and forestry involving the exchange of *agricultural* output for *forestry* output, going far beyond that outlined recently by the *Department of Agriculture Food and the Marine*. The suitability of such a change for Ireland needs to be demonstrated.

(b) Carbon accounting systems

The report states, "Very large differences in net sequestration outcomes from LULUCF activities are associated with the use of different accounting approaches."

It would appear that there are significant penalties for agriculture in moving from a net-net to a gross-gross accounting system. To ensure that the right choice is made, the precise implications of both choices need to be spelled out for Irish agriculture.

The report also states that the rewetting of organic soils under dairy and tillage production systems would cause significant income losses. There are also technical feasibility issues around achieving purported objectives in rewetting land that is not flat. If carbon budgets were to be set for such schemes, research and demonstration projects on various topographies would need to be completed, so that feasibility, costs and income losses could be assessed, and fair compensation systems put in place.

(c) Methane accounting

It has been shown from pure physics that the effect of methane cannot be reduced to a CO<sub>2</sub> equivalent [1]. Therefore, methane should be considered as methane *per se* and not as a quasi-CO<sub>2</sub> equivalent. In addition, it has been shown that, under steady state conditions, biogenic methane has negligible, if any, global warming effect. It would avoid a lot of unnecessary complexity if this scientific principle were recognised in the accounting system.

(d) Wider implications of impact on agriculture and food production

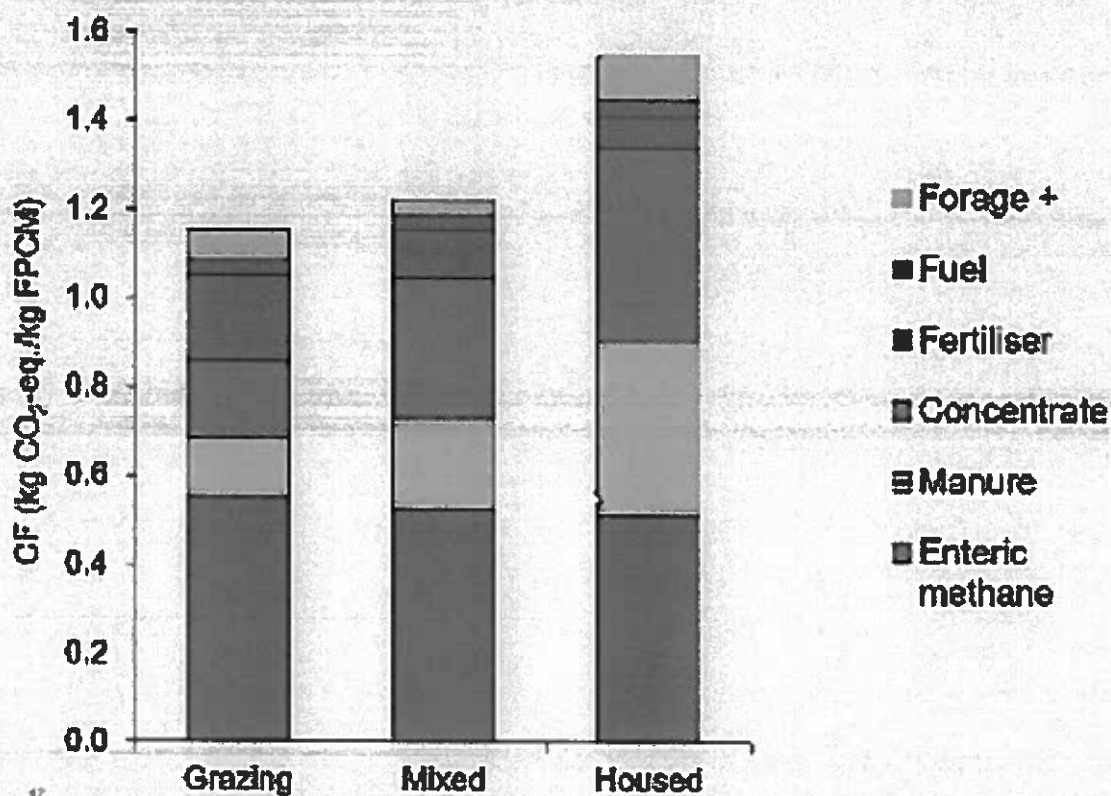
The report states that linkages between agriculture, the food industry and other economic sectors mean that there would be negative consequences, not only for agriculture, but also for the food sector and for the wider economy. Where are the reports detailing those negative consequences and the full cost, including consequential losses to the economy?

Given that Irish agriculture is starting from a much more sustainable place vis-à-vis other agricultural regions (Figure 1), it would be unacceptable to straddle the farming sector with those issues. In addition, there are potential constitutional issues around putting specific carbon cuts into law while the technology to achieve them is non-existent and in some cases not feasible. It is essential that Ireland maintains its food production.

Yours sincerely,

[Redacted signature]

Figure 1. Carbon footprint of milk in different systems [2]



[1] Bates, JR (2020) Submission to the EU (5 August 2020): "Response to the EU Commission's call for Submissions on Anthropogenic Methane Emissions"

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12504-EU-Methane-Strategy/F541115>

[2] Teagasc Signpost, 04 Feb 2022.