



**Submission from the Irish Natura & Hill Farmers Association (INHFA)
to Minister Ryan following call for expert evidence to inform the next Climate
Action Plan**

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Introduction

As a farming organisation representing thousands of members on hills, lowland, and high nature value lands, we are concerned that the current proposals related to climate change targets are not reflective of the enormous effort made by many farmers in addressing the challenges posed by climate change.

On this basis, it is essential that due consideration is given relating to key points around agricultural production and land use. These include:

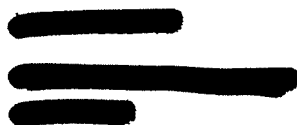
- In calculating our agricultural emissions, the carbon balance for the production of that food is applied as part of Ireland's GHG emissions. However, oil or oil by-products such as diesel, petrol, or home heating oil which are imported into the country are also applied as part of Ireland's GHG emissions. How is this acceptable? To us it seems reasonable that any calculation of GHG emissions should choose between consumption or production – unfortunately, we are being hit on the double. For Ireland we export 85% of our agricultural products and other major exporting countries such as New Zealand and the Netherlands, this is a major concern.
- When deciding on these calculations did countries with higher population densities push to have this methodology applied? Why has the Intergovernmental Panel on Climate Change (IPCC) accepted this model when clearly it is unjust?
How does this model reduce food waste which is a major contributor to GHG emissions and should be a global priority in any discussion around climate change?
Finally, why did Ireland accept this when it discriminates against us?
- In deciding on the sectoral targets, it is a major mistake to separate agriculture from land use. In doing this, you immediately reduced options to farmers to offset their GHG emissions. This is totally unacceptable and must be revisited. Currently, we see large corporations and some of our multi nationals making the claim they are carbon neutral or going carbon neutral. This is based on their ability to offset GHG emissions most probably through a land use strategy while farmers with a major land base are denied this opportunity.
- When striving to deliver improved environmental outcomes it is vital that we recognise the benefits of extensive grazing systems. In a report published in 2018 by the EU Commission titled '*Grazing for Carbon*' these benefits were clearly outlined as detailed in the Executive Summary where it stated that "*A quick literature review showed that there is net C sequestration within grassland systems in general, but in a mixed grazing and cutting system there is less carbon sequestration than under pure grazing.*" Based on this and the overall report, sustainable grazing as practiced through extensive farming systems by many of our suckler and sheep farmers will not only deliver an end product in terms of beef but will also deliver in terms of carbon sequestration. In addition, these

farming systems are low in terms of chemical fertilizer input and organic manure all of which benefit the overall environment.

- When calculating our GHG emissions Ireland has favoured the IPCC model as opposed to the Life Cycle Assessment (LCA). By choosing this model we are undermining grass-fed and our naturally reared suckler systems, a fact that is acknowledged by research conducted by Teagasc. In a paper titled *'Evaluation of the effect of accounting method, IPCC vs LCA, on grass-based and confinement dairy systems' greenhouse gas emissions'* the LCA method calculated that the grass-based system saw significantly lower emissions levels and contradicted the IPCC method that calculated lower emissions from the confinement system. However, the LCA approach was identified in this paper *"as the preferred approach to assess the effect of management changes on GHG emissions."*
- Before we proceed with any recommendations, it is vital that we reassess the calculation models and the decision to use the IPCC model when Teagasc research has indicated that the LCA model is a better option.
- With regard to current discussions around GHG emissions and in particular methane we have seen how two groups of academics giving scientific evidence to a recent Oireachtas hearing on methane, were not in agreement with each other's calculation methods. Based on the Oireachtas discussion, it is quite clear that science is still evolving. It is also worth noting that in 2005 Ireland's Beet industry was closed down based on facts that were subsequently found to be inaccurate. We cannot afford to see something similar happening again.

We welcome the opportunity to make this submission and are hopeful that due consideration is given to all the points we have outlined. If further clarity is needed please contact us on 0719302715 or email inhfaoffice@gmail.com

Yours sincerely,

A redacted signature consisting of three thick, horizontal black bars of varying lengths, completely obscuring the name and any handwritten notes.