



**IFA**

# IFA submission to the National Adaptation Framework

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# IFA

*The Irish Farmers' Association (IFA) is Ireland's largest farming organisation with approximately 77,000 members in 940 branches nationwide. We have protected and defended the interests of Irish farmers in all sectors for more than 65 years, lobbying and campaigning for improved conditions and incomes for farm families.*

## Introduction

Farmers are committed to playing their part to reduce greenhouse gas emissions and meet the Climate Action Plan targets. Already, they have made significant investments to improve efficiency and reduce emissions. In dealing with the climate change challenge, it is imperative that Irish farmers' current sustainability credentials and the existing carbon reservoirs on farms are fully acknowledged.

Maintaining the economic sustainability of farms, to attract and retain skilled young farmers and encouraging new entrants to ensure food security while investing in the green transition, remains a long-term challenge for the sector. This needs to be fully considered as part of planning for climate resilience in agriculture and will be crucial if farmers are mitigate and adapt to the changing climate.

We welcome the opportunity to make a submission to the public consultation on the National Adaption Framework (NAF).


## CCAC Scorecard 2023

The Climate Change Advisory Council (CCAC) scorecard for Agriculture, Forestry and Seafood (DAFM) showed an overall positive trend when compared to 2022. The report observed good progress in mainstreaming adaption into new policies, planning and financing frameworks but stated that this would require sustained and effective implementation to be successful.

Sector	Risk, prioritisation & adaptive capacity	Resourcing & mainstreaming	Governance, coordination & cross cutting issues	Overall	Trend <sup>2</sup>
Agriculture, Forestry and Seafood (DAFM)	Moderate	Good	Moderate	Moderate	↑

The report identified a number of measures that were important to deliver improved action for adaption for agriculture (and biodiversity):

- The successful implementation of CAP Strategic Plan, Forestry Programme and the National Horticulture Strategy.
- The need to secure dedicated funding streams for adaption and mitigation.
- The development of training plans on climate action and further engagement and outreach is needed to mainstream adaptation.
- Building resilience through collaborative actions with different stakeholders.



The scorecard is a useful tool in improving strategic communication with stakeholders, and ensuring that priority measures can be delivered. Agriculture is uniquely placed to support both improved carbon sequestration and biodiversity through nature-based solutions, but it is critical that farmers are supported both from an advisory and financial perspective to adopt such practices.

## **CAP Strategic Plan**

The value of CAP has been in decline in real terms for almost two decades. Notwithstanding, farmers are continually being asked to do more to qualify for their CAP payments. The additional requirements on farmers in the pursuit of more sustainable production methods translate into increased production costs that are not remunerated by the market. We cannot expect farmers to deliver the increased climate demands with the less financial resources, particularly in a significantly more complex regulatory and administratively challenging environment.

## **Agri-Climate Rural Environment Scheme (ACRES)**

While farmers are being asked to do more for climate and biodiversity under Ireland's CAP Strategic Plan the Agri-Climate Rural Environment Scheme (ACRES) was limited to 50,000 farmers, this is substantially lower than the 70,000 farmers that participated in REPS. Furthermore, the IFA estimates that the budget for REPS, when adjusted for inflation, was 19% higher than ACRES. It is crucial that Government ambition until ACRES is increased to meet farmer demand, and that all farmers that want to participate are eligible.

## **GAEC 2 (Protection of wetlands and peatlands)**

GAEC 2 is a new GAEC standard that seeks to avoid and/or minimise carbon release through on-farm management practices, alongside the protection of wetlands and peatlands. In terms of impact, Irish farmers are among the most exposed in the EU, given approximately 18% of Ireland is in peatland, one of the highest shares in the EU. Initial estimates suggest, using Teagasc-EPA Soils and Subsoils mapping, almost one-in-three Irish farmers could be impacted (approx. 42,000 from 130,000 herd owners) by GAEC 2 restrictions, with higher concentrations in the Midlands and along the Western seaboard. Numbers could be even higher if new maps become available and are utilised.

These are largely extensive family farm run operations, across all farm sectors, that are the lifeblood of their local communities. Any impact on farm operations will have wider socio-economic repercussions, and before any GAEC 2 standard is applied, its impact must be clearly understood. It is imperative that all available flexibilities are optimised with regard to the design and implementation of GAEC 2, so as to minimise the socio-economic implications while maximising environmental benefits on-farm. Site specific management practices rather than a catch-all series of restrictive measures should be introduced, irrespective of underlying peat type as proposed.



## **Forestry Programme 2023 – 2027**

The successful implementation of the Forestry Programme 2023 -2027, which hopes to deliver an annual afforestation target of 8,000 hectares, is dependent on farmer planting. The Government needs to de-risk the decision to plant, and provide assurances that if a farmer decides to plant, that their investment will be protected.

There is a generation of farmers that have planted and they have first-hand experience how policy can radically change over a forest rotation. Forestry is like no other land-use, when you plant your land, you are obligated to replant and keep your land in forestry in perpetuity. This means that farmers are locked in, that they are powerless to the impact of changes in policy irrespective of the impact on their investment or the value of their asset.

The successful delivery of the forestry programme is focused on the increases in premium payments, but does not consider the wider socio-economic that influence a farmers' decision to plant. It is also worth noting that the increased premiums come at a cost, these include a reduction in timber productive area, increased regulatory burden that can increase the cost of establishment which are not covered by the establishment grant, not to mention the costs to get a licence to manage the forest or to construct a road or the conditions being attached, as well as the replanting obligation that all combine to significantly reduce the attractiveness of the scheme.

## **Dedicated Agriculture Climate Fund**

The primary focus of the Common Agricultural Policy (CAP) is on agricultural productivity, market stability, and income support, and given the scale of investment required for climate adaptation and mitigation it cannot adequately address the specific challenges posed by climate change.

A dedicated climate fund specifically earmarked for climate actions in the agricultural sector is required. The current supports available under CAP do not provide sufficient incentives for farmers to adopt widescale adoption of climate-smart practices to meet Ireland climate action plan targets. A dedicated fund that provides economic certainty would enable farmers to prioritise long-term climate resilience.

The government cannot rely solely on the CAP to address the unique challenges farmers face in mitigating and adapting to climate change. Climate change introduces uncertainties and risks governments need flexible and adaptive strategies that can evolve with changing climate conditions and emerging challenges.

As highlighted in the CCAC report to new dedicated funding streams for adaption and mitigation in agriculture would enable Ireland to invest in strategic infrastructural developments such as:



### **Carbon farming framework**

The Carbon Farming Framework for Ireland is currently being development and should provide farmers with an additional payment if there are to be widespread adoption of measures to reduce emissions. Even if a measure is supported under CAP or the Forest Programme farmers must be eligible to earn an additional carbon payment for the carbon reduced or sequestered. As set out in Ireland's CAP Strategic Plan 2023-2027 payments are made based on (i) additional costs incurred and (ii) income foregone as set out in the EU Regulations under Article 31 (7) (b) of the CAP Strategic Plan Regulation. It is not a payment for the carbon sequestered or the ecosystem service provided. To incentivise widespread adoption and the long-term sustained change any carbon or ecosystem services payment should be additional that is required at farm level to meet sectoral targets.

The proposed additionality requirement that farmers would only be eligible for a carbon payment for new measures implemented is viewed negatively by farmers, as it (i) does not value the existing carbon reservoir in soils and or hedgerows on farms and (ii) penalises earlier adopters of practices that have improved carbon removals and prevents them from earning as much money as farmers who adopt practices later. The definition of additionality needs to be reviewed so that it does not create an unfair penalty for farmers who had been innovative and forward-thinking enough to adopt beneficial practices years. Farmers should be paid for their beneficial practices, regardless of when they started.

### **Improving slurry storage capacity on farms**

A key priority should be to improve slurry storage capacity on farms, this delivers co-benefits to climate, water and biodiversity. A 70% capital grant should be available for all farmers investing in slurry storage facilities. Investments in slurry storage should be prioritised for fast-track TAMS approvals. Access to grant aid for farmers who are not in full compliance with regulatory requirements should be considered for situations where they are going beyond regulatory requirements. In addition, the Minister for Housing, Local Government and Heritage should consider ways to expedite the planning permission process for those seeking to invest in slurry storage.

### **Farmer centric biomethane supports**

A successful AD industry in Ireland will require farmers at its core. The requirement for feedstock to supply the proposed output of 5.7TWh by 2030 will have to come from agriculture in the main, this is estimated to require grass from 120,000 hectares and winter slurry from 1.3 million cattle. Any plans and supports for the industry must ensure the viability of small and medium scale digestors, along with larger industrial scale plants.

If the targets are to be delivered then the Government needs to introduce a Renewable Heat Obligation scheme (RHO) with sustainable subsidies, provide capital grant funding to support the construction of viable on farm AD and Government backed finance (similar to current SBCI lending structures) to enable farmers develop AD plants. The current regulations and taxes to support the development of AD plants need to be streamlined. In addition, a biomass

mobilisation scheme to support farmers to coordinate, mobilise and establish a sustainable feedstock supply chain is required.

### **Capacity Building and Collaboration**

Enhancing farmers' knowledge and skills is essential for effective mitigation and adaptation. By providing training and capacity-building programmes to farmers on climate-smart agricultural practices, risk management, and the use of modern technologies, it will empower them with the knowledge and skills needed to adapt to changing climate.

The need for ongoing communication with farmers, to ensure effective implementation of climate smart practices was highlighted as critical to implementation in the final evaluation of the Smart Farming programme, a programme that operated for 10 years by the IFA in partnership with the EPA. Farmers also stressed the value of the one-on-one interaction at farm level so farmers get tailored advice as well as the importance of creating farmer network and peer-to-peer learning opportunities. These measures enhanced relatability and effectiveness by allowing farmers to connect over shared situations and provide practical advice.

Innovative projects, such as the Agricultural Sustainability Support and Advisory Programme (ASSAP) that have adopted a collaborative solution-based approach to improving water quality have proven to be successful. This collaborative approach needs to be adopted nationally to support farmers in climate mitigation and adaptation. Additional funding is required to support educational initiatives, extension services, and training programs and needs to be prioritised under Agriculture's Sectoral Adaptation Plan.

### **Conclusion**

The provision of effective support both advisory and financial to farmers to adapt to climate change is crucial to ensure the sustainability of agriculture and food security. The support of investment in infrastructure that enhances resilience will help farmers mitigate the impacts of climate-related challenges. However, there needs to be greater recognition within the NAF of the economic implications and the implementation challenges. Addressing these concerns is crucial for effective collaboration and successful adoption of climate-friendly practices.