

SUBMISSION ON OUTLINE HEADS OF THE CLIMATE  
ACTION AND LOW-CARBON DEVELOPMENT BILL



This submission represents the views of the Irish Agri-Food Industry.

Submitted by                      The Irish Dairy Industries Association

Meat Industry Ireland

Food and Drink Industry Ireland

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# SUBMISSION ON OUTLINE HEADS OF THE CLIMATE ACTION AND LOW-CARBON DEVELOPMENT BILL

The Irish Agri-Food Industry supports the development of an inclusive, globally focused climate policy that supports the objective of sustainable development, economic recovery and contributes to the alleviation of hunger and undernourishment. Our industry is committed to a process of continual improvement in sustainability and efficiencies so that increased production is achieved with reduced environmental impact. This commitment is embedded in the industry's development strategy Food Harvest 2020, prepared by both industry and government, which sets out an ambitious growth target for Ireland's food industry based on the principles of Smart, Green, Growth.

The Irish Agri-Food Industry<sup>1</sup> broadly welcomes the outline heads of the Climate Action and Low-Carbon Development Bill. The challenge in achieving the reduction targets is not insignificant and has the potential to either undermine Ireland's economic growth or alternatively, with appropriate policies, has the potential to enhance Ireland's economic recovery. It is our hope that a collective approach to the development of a low-carbon strategy for growth that Ireland's agri-food industry can become part of the solution to achieving sustainable growth in the world's most carbon efficient food producing country.

## 1. LOW CARBON AND SUSTAINABLE AGRICULTURE

Primary agricultural production is the interaction between man and the environment to produce food. Sustainable agricultural production is about ensuring that mans production of food does not result in undesirable consequences but allows for the continual production of food in harmony with nature. Agricultural systems can therefore be managed to ensure the least impact on the environment while producing increasing volumes of sustainable food.

However sustainable food production does result in carbon emissions as the tilling of soil and the natural processes of ruminants produces carbon, methane and nitrous oxide all of which are considered in the development of a low-carbon economy.

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<sup>1</sup> The Irish Agri-Food Industry is represented by Food and Drink Industry Ireland (FDII), the Irish Dairy Industries Association (IDIA) and Meat Industry Ireland (MII)

While some suggest that the route to a low carbon economy can be best achieved through the limitation of agricultural production, the reality of a rapidly growing global population means a growing global demand for food. This food can be produced from sustainable agricultural systems or unsustainable production systems. We believe that global society is best served through the development of sustainable food production systems in regions where food production occurs with little environmental impact. Ireland is one such region and our challenge is to allow for our sustainable food production system to develop in a low carbon policy environment.

## 2. CARBON CANNOT BE ENGINEERED OUT OF COWS *BUT ON-FARM EFFICIENCIES CAN OFFER REDUCTIONS*

The largest portion of non ETS EU emissions from Ireland's Agri-Food industry is comprised of emissions from enteric fermentation (cow digestion). This is a natural process that cannot be engineered out. Therefore animal numbers will continue to be the primary driver of emissions from Irish agriculture.

**Irish Farming is Efficient:** The GHG efficiency (unit product per unit GHG emitted) of Irish agriculture is really high, especially compared to the developing world due to intensive pasture management and relatively high-yielding animals<sup>2</sup>.

Work to date by Teagasc, the national advisory body suggests that reductions in emissions per unit of production are possible to achieve and are linked to increased farm efficiency. However the Irish Agri-Food Industry recognises the difference between improving emissions per unit production and the achievement of a reduction in absolute terms.

The linkage between farm efficiency and emission reduction per unit of output is important as increased profit arising from increased efficiencies creates the strongest incentive for action at farm level. Further incentives are not required to encourage improved activity as the economic incentive of increased profitability is the strongest motivator of change.

**Irish agriculture can become more sustainable.** At individual farm level, there are actions that can be undertaken that can improve the sustainability of food production. To assist in this process, a national audit of farms is being undertaken to identify how individual farmers can become more sustainable in their food

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<sup>2</sup> McGettigan et al. 2008, MAF (2008)

production systems. Managed by Bord Bia, a series of Quality and Sustainability Schemes are being rolled out that involve individual farmers in 18 month independent audits of their farms. This identifies where farmers can improve their sustainability and will ultimately result in improvements throughout Ireland's agricultural systems. To date over 33,000 beef and sheep farms have been audited with the dairy programme due to commence later this year.

### 3. IS A NATIONAL APPROACH APPROPRIATE?

The challenge for policymakers is achieving a balance between the promotion of sustainable agricultural practices and the achievement of a national target based on a narrow accounting system. The means by which national governments must account for carbon reduction are specific and unrelated to most aspects of sustainable agriculture.

This undeniable conflict between sustainable agricultural practices and accounting practices, pose a very real challenge to policymakers. However global and EU institutions are now considering this dilemma as they face the challenge of feeding a growing population from more sustainable food producing regions. Accordingly it is not inconceivable that a differing approach to dealing with global agricultural emissions will be developed as part of the 2030 and 2050 strategies.

The proposal for Sectoral roadmaps to be developed as part of Ireland's Climate Action and Low-Carbon Development Bill is therefore appropriate and consistent with the global policy developments. This will allow for the alignment of the Food Harvest 2020 strategy for Smart, Green, Growth with a national strategy for carbon reduction. This logical alignment will ensure that sustainable agriculture will become the central pillar for Ireland's agricultural growth, underpinned by independent farm audits that identify where improvements can be achieved. It would be our wish that at some stage that these sustainable agricultural practices can be recognised through a more appropriate accounting model.

### 4. SECTORAL ROADMAP FOR AGRICULTURE

Food Harvest 2020 continues to be the relevant strategy for Ireland's Agri-Food industry. An implementation committee chaired by the Minister enables review of the milestones set out in the strategy and creates a platform for all stakeholders to deal with the challenges as they arise. It would be appropriate that this implementation committee and its structures for inclusive stakeholder involvement assume responsibility for the development of the sectoral roadmap for agriculture.

This will ensure alignment of strategies of both Food Harvest 2020 and the development of enhanced sustainable agriculture in Ireland.