



23 March 2015

Submission from Stop Climate Chaos to the Department of Agriculture, Food and the Marine's consultation document on the potential for Greenhouse Gas (GHG) mitigation within the Agriculture and Forestry Sector

Stop Climate Chaos is a coalition of civil society organisations campaigning to ensure Ireland plays its part in preventing runaway climate change. We have worked solely on climate change since our launch in 2007 and are the largest network of organisations campaigning for action on climate change in Ireland. Current members include development, environmental, youth and faith based organisations. They are Afri, An Taisce, BirdWatch Ireland, Climate Action Ireland Platform, Christian Aid, Comhlámh, Community Workers' Co-operative, Concern Worldwide, the Methodist Church Council on Social Responsibility, Cultivate, Eco Congregation Ireland, ECO-UNESCO, Feasta, Friends of the Earth, Gorta, Just Forests, Kimmage Development Studies Centre, Latin America Solidarity Centre, Liberian Solidarity Group, Mountmellick Environmental Group, National Youth Council of Ireland, Oxfam, Sustain West Cork, Trócaire, Vita, and VOICE.

The science of climate change is now beyond doubt. The climate is changing and the changes are occurring at a rate more rapid than many scientists predicted. Global mean temperatures have increased by 0.8°C since preindustrial times. Sea levels have risen by approximately 20cms. Extreme weather events (heat waves, tropical storms) are on the increase and arctic sea ice reached a record low in 2012. As climate change advances, the cost of responding to and recovering from extreme weather events increases. Despite this reality, and the obligations that Ireland and other developed countries have had for more than twenty years to limit and reduce their greenhouse gas emissions, national and international action on climate change remains off track.

The consultation document on the potential for Greenhouse Gas (GHG) mitigation within the Agriculture and Forestry Sector is a welcome contribution to the national conversation on how Ireland will reduce its emissions. However it is disappointing to see limited detail in the document in terms of potential measures, especially in relation to the effect these measures could have on reducing overall emissions from the agricultural sector. The measures need to be quantified if there is to be a meaningful discussion and debate of the options available within the sector. The recent report from the Joint Research Centre of the European Union points to measures that could see Ireland's agricultural emissions reduce by 22-42% by 2030. If Ireland is serious about making actual emission reductions in the sector, and not just reducing the emissions intensity of production, the measures to be considered should be presented in a quantified manner.

More broadly, Stop Climate Chaos proposes that a number of principles inform decision-making and the formulation of policy in this area.

Recognition of climate justice and of the need for equity in the response to climate change

Recognising the threat climate change poses to lives and livelihoods, in particular the most vulnerable around the world, **equity must be the guiding principle in the decisions we make**. Those who have done least to cause climate change are suffering disproportionately as a result of it. Agricultural policy in Ireland must recognise the implications of our decisions and act in accordance with our fair share of the global effort to mitigate and adapt to climate change.

The projections from the EPA show that Ireland is not going to meet its 2020 target for emissions reductions, and that emissions from the agricultural sector will continue to rise. Allowing emissions to rise undermines food production in already food insecure parts of the world, and limits the extent to which the economies of poorer countries, whose main sector is agriculture in many cases, can develop. Increased agricultural production for export from Ireland will in no way compensate for rising food insecurity in the developing world.

Policy Coherence for Development (PCD)

Coherence is a prerequisite for meaningful policy-making. The consultation document fails to show how the incoherence between the demands of Food Harvest 2020 policy and emissions reductions targets can be resolved. Since the signing of the Lisbon Treaty in 2009, Policy Coherence for Development (PCD) is a legal obligation of all EU member states. Article 208 states that all EU policies must take into consideration development objectives: at best, this means that all EU policies must support developing countries' development needs, or at least not contradict the aim of poverty reduction and eradication. Whilst the EU sets this legal framework, the onus is on individual countries to transpose this into national frameworks.

One World, One Future, Ireland's policy for international development, commits us to policy coherence for development. This is to ensure that all policies likely to affect developing countries take development objectives into account.

As a coalition with a strong representation of development organisations we are particularly concerned at the repeated claims made by various agricultural interests that Irish exports of beef and dairy products in some way make a contribution to global food security. This is simply not the case. The increased demand for meat and dairy products on global markets has not come from those facing food insecurity but from consumers in the global middle class. **Claims that Irish livestock and dairy agriculture exports are important to food security in importing countries have no basis in fact.**

Conversely, it is also clear that climate mitigation is an area that impacts on developing countries. If global agricultural emissions are not reduced (especially livestock methane and nitrous oxide), it will not be possible to stay within a 2°C temperature increase. The impacts of climate change will be felt most keenly by the world's poor, and the IPCC has identified severe impacts on food security as one of the most serious of those impacts.

Directly contrary to claims that Irish exports contribute to food security, there are important public health concerns about Irish agricultural exports, in particular the export of infant formula. **We are deeply concerned that Irish agricultural policy is focused so strongly on increasing the export of infant**

Stop Climate Chaos 9 Upper Mount Street, Dublin 2.

+353 1 6394653 info@stopclimatechaos.ie

www.stopclimatechaos.ie

formula to developing countries, particularly China, despite the clear public health advice that breastfeeding is healthier and ongoing concerns about aggressive marketing of infant formula contrary to WHO guidelines.

Clearly the coherence of Irish agricultural policy with our international development policy needs to be urgently addressed. We would like to know what arrangements are being made to ensure that consideration is given in the development of a mitigation plan for the agriculture and forestry sector to the impact in developing countries of the adoption or omission of various mitigation options. It is widely recognised that policy coherence for development is something that requires specific analysis and attention.

Will DAFM be obtaining advice from development specialists, Irish Aid or other development experts to assist in ensuring PCD? This advice should address the development impacts of agricultural policy. Clearly this needs to include greenhouse gas emissions and infant formula and infant health. It seems likely also that it should address the land use impacts in developing countries of increased animal feed imports to Ireland.

We are eager to engage further on the Policy Coherence for Development aspects of Irish agricultural policy and Irish agricultural greenhouse gas mitigation plans and would appreciate further information on how PCD is to be addressed in the policy process.

Total Annual Agricultural Emissions (not 'Efficiency') is the Critical Gauge of Mitigation Action

Climate science is clear that capping the total sum of all future CO₂ emissions and cutting the annual total emissions of other greenhouse gases (especially methane) are the critical aims of climate mitigation action. The IPCC says: "Limiting climate change will require substantial and sustained reductions of greenhouse gas emissions." Mitigation **requires** cuts in total emissions.

This means that improving the 'efficiency' in GHGs produced per unit of output (per kg of milk or beef for example), will *not* achieve any mitigation if the total production (in kg of milk or beef for example) increases enough such that the total emissions stay the same or increase. We are disappointed to see that DAFM persist in suggesting that "achieving efficiency improvements" equates to achieving climate mitigation. It does not.

We would also ask that DAFM and Teagasc take note that, as per the most recent Carbon Trust PAS 2050 definition of the term, 'carbon footprint' is a measure of the total emissions of an activity, denoted by the **total mass of GHG** produced; it is not a measure of the GHG efficiency of production. In PAS 2050, such GHG efficiency is denoted by the **mass of GHG produced per unit output**, and is correctly called the 'emission factor'. We urge DAFM and Teagasc to note this difference, which is important because if production increases outweigh efficiency gains, made by cutting the emission factor, then no mitigation action or cuts in carbon footprint will have been achieved. This simple fact needs to be fully acknowledged by DAFM and Teagasc so that stakeholders focus primarily on cutting total emissions, not only improving efficiency.

In reality a mitigation action plan to cut total annual emissions **requires** definite GHG pricing and/or a regulated cap and trade system (with no free permits). This would give investor certainty and chart a direct path to carbon neutrality, not just a vague 'approach' to an ever-retreating 'horizon point'. We urge DAFM to acknowledge that this is necessary for livestock emissions as it is for all GHG emissions.

Policy coherence will require Ireland's National Mitigation Plan to make substantial and sustained cuts in emissions. If an expanding livestock sector can only achieve what DAFM describe as "the enormous climate efficiency ambition that is implicit in achieving a flat lining of emissions", then other sectors - energy, residential, and transport – will have to make far faster and far more radical changes. We would ask DAFM to note that this is not a tenable mitigation policy, even to 2020, let alone 2050. 'Flat lining' is a euphemism for achieving no mitigation at all.

Flat-lining or increasing livestock emissions to 2020 will add to the compliance bill for missing Ireland's targets, which DAFM say "will come at a cost to the Irish Exchequer". We would ask DAFM to explore the option of ensuring that the polluter pays rather than the general taxpayer. Livestock-derived foods in the EU could easily bear a cost based on the efficiency with which they have been produced. In this way the claimed relative efficiency of Irish production would have a market advantage and total emissions produced in the EU overall could be reduced. Ringfencing revenues raised for mitigation would drive far more rapid mitigation and sequestration measures. Pricing livestock emissions is **climate smart policy** enabling consumer choice.

As the EPA stated with regard to the impacts of FH2020, mitigation measures "may include such measures as rescheduling, re-examination or adjustment of the strategy targets where any conflict with national or international environmental obligations arise." It is very clear that the emissions increases due to FH2020's increasing production are in conflict with Ireland's emissions reduction obligations. Once a national mitigation plan is in place then the sectoral mitigation measures will need to deliver reductions toward achieving national mitigation. **We therefore urge DAFM to produce a revised mitigation plan, one that delivers substantial and sustained cuts in agricultural emissions as soon as possible and year-on-year to 2050.**

A fair, factual and inclusive national debate

A fair, factual and inclusive debate on the choices that we as a society need to make must begin. Framing the debate within the context of the challenges posed by climate change is essential. Climate change is now the context within which we all operate, and should be the lens through which the choices we make are framed. Are we as a nation content to allow agricultural emissions to rise in order to continue to export beef and dairy products, knowing that rising emissions will undermine food production in already food insecure parts of the world?

Transitioning to a low carbon economy presents considerable opportunities but will also require difficult decisions. Understanding the trade-offs within the broader context of climate change and the threat that it poses will make some of the hard choices easier to accept.

Stop Climate Chaos would be happy to contribute to the national debate and looks forward to engaging further with DAFM in relation to the development of mitigation proposals. If you have any queries about any of the points in this submission, please contact:

Ciara Kirrane
Coordinator
ciara@stopclimatechaos.ie
087-9423531