RESPONSE TO SUBMISSIONS RECEIVED FROM PUBLIC CONSULTATION ON THE DRAFT AGRICULTURE, FOREST, SEAFOOD SECTORAL ADAPTATION PLAN

49 submissions were received when the public consultation closed on 16 August 2019 with three submissions received after that date. For the purpose of the report below the main themes arising were grouped and the Department’s consideration and response to the issues is included. While this report highlights themes there are a number of individual comments raised which have also been considered. In some instances points raised relate to issues which are beyond the remit of the Department of Agriculture, Food and the Marine and/or beyond the remit of this iteration of the agriculture, forest and seafood sectoral Adaptation Plan. These issues will be subject to further review in the context of Department policy development or where outside the remit of this Department will be referred to the relevant body. For example, information gathered relating to where respondents access climate related information will be considered as part of the Department’s communications planning.

Our approach to climate action is twofold. On the one hand we are taking steps to reduce our emissions and on the other hand building resilience and preparing to adapt to a changing climate. Therefore, this Climate Change Adaptation Plan should be read in conjunction with the All-of-Government Climate Action Plan to Tackle Climate Breakdown which sets out a pathway to achieve reductions in our Greenhouse Gas Emissions. It sets out an ambitious target for the agriculture sector which will require the sector to innovate and to increase the delivery of solutions to tackle climate breakdown.

For its part the Department is taking a holistic approach to climate action which includes embedding both mitigation and adaptation requirements into our policies and measures. Many of the points raised as part of this public consultation will feed into the development of those policies and measures. The Department is developing a governance structure for monitoring and implementing climate action.
### ACTIONS AND OBJECTIVES:

- The Plan lacks specificity: greater detail is required in the Actions and Objectives
- Actions identified in the case studies need to be adopted into the Plan

### DAFM Response:

- Having initially been through a non-statutory process it was clear that raising awareness and mainstreaming climate adaptation information in decision making across the Department’s schemes and policies were important objectives for this Plan.
- Therefore, the approach was to prepare a high-level, accessible Plan supported by a series of case studies which provide additional information on likely impacts from a changing climate and steps for building resilience.
- The case studies highlight actions already underway and in some cases potential further steps towards adaptation, consistent with the high level actions set out in the plan. Implementation of specific actions across the wide range of schemes and policies will be prioritised as Action 1 is implemented.

### Submission received from:

- An Taisce
- CARO
- Hacketts Agricultural Consultants
- ICMSA
- National Federation of Group Water Schemes
- UCD
- UCD CRAES
- Wicklow Environmental Network PPN

### BROAD RANGING VIEWS ON IMPACTS OF CLIMATE CHANGE:

- There are a range of views on what the impact of climate change is likely to be

### DAFM Response:

- The Department of Agriculture, Food and the Marine through its stakeholder group, which is made up of experts from across the Department and its agencies, objectively assessed the best available science including the work of the IPCC, EPA and ICHEC and through a consensus approach identified the likely impacts and risks facing the sector. The Department bases its policies on the consensus of the best available science.

### Submission received from:

- An Taisce
- D. D’hondt
- F. Ryan
- FH Wetland Systems Limited
- Irish Climate Science Forum
- T. Gleeson
- Wicklow Environmental Network PPN
| PROTECTING BIODIVERSITY AND CARBON SINKS: | • The role of a diverse landscape in contributing to building resilience is recognised. It is about achieving the balance around which measures work best and where. | • A. Gough  
• A. Strang  
• Agricultural Consultants Association  
• An Taisce  
• D. D’hondt  
• FH Wetland Systems Limited  
• Hacketts Agricultural Consultants  
• ICMSA  
• Irish Natura Hill Farmers Association  
• Irish Water  
• J. Cooper  
• J. D’hondt  
• J. Mullally  
• Killybegs Fishermen’s Organisation  
• M. Strang  
• S. Collins  
• S. De Vere Hunt  
• T. Gleeson  
• T. O’Brien |
| • In particular the cross sectoral nature of issues related to biodiversity and the relationship between agriculture and biodiversity were emphasised  
• Role of upland grazing  
• Hedgerows, non-forest woodland and riparian buffers should be used and managed more effectively and accounted for in terms of sequestration  
• Concerns in relation to water quality  
• Concerns in relation to the issue of sustainability  
• Seaweed/kelp as a carbon sink  
• Enforcement of fishing regulations  
• Effects of Climate Change on fish stock availability  
| • Hedgerows are estimated to cover 3.9% of the Irish landscape. The potential for hedgerows and non-forest woodland patches across the landscape to represent a significant carbon sink and potentially be used as a mitigation option is recognised in the Climate Action Plan.  
| • A new biodiversity case study has been added to the Adaptation Plan highlighting the relationship between biodiversity and the agriculture sector.  
• DAFM supports tree planting through agri-environmental schemes, which focus on establishing small groups of tree, which would not be funded under the afforestation scheme. Since the introduction of agri-environmental schemes in 1994, 6,758 kilometres of new hedgerows and more than 3.7 million trees have been established on non-forest land.  
• DAFM supports environmental sustainability and the reduction of the impact of fishing on the environment, amongst other work, through the European Maritime and Fisheries Fund (EMFF), thus increasing resilience of ecosystems and fish stocks.  
| • Ireland works within the framework of the Common Fisheries Policy to deliver stocks to Maximum Sustainable Yield (MSY) levels by 2020 at the latest and also includes other significant reforms, such as regionalisation of certain aspects of fisheries management and the phased introduction of the Landing Obligation (discards ban). |
- In the case of potential seaweed options, DAFM’s licensing role is confined to the cultivation of aquatic plants. Aquaculture licence applications undergo screening and if necessary further detailed environmental assessments. There is currently 130ha of seaweed licensed capacity in Ireland according to Bord Iascaigh Mhara (BIM) estimates. Harvesting of wild seaweed is regulated by the Department of Housing, Planning and Local Government. Ireland takes its responsibility to manage its fisheries sustainably very seriously. The Sea-Fisheries Protection Authority (SFPA) is the independent statutory body responsible for the regulation of the sea-fisheries and seafood production sectors. DAFM works with the SFPA to address any issues which may arise on matters of control & enforcement policy of sea-fishing.

- The effects of warming oceans, acidification and other major ocean changes on stock availability is the basis for a key research programme being commenced by the Marine Institute (MI) this year. Details of this are available in Section 2.4 of the Seafood Background Document.

- Ireland has a network of Natura 2000 sites designated to protect at risk species and key habitats. DAFM is responsible for ensuring sea-fishing activities are conducted in a manner that avoids the deterioration of designated features of Natura 2000 sites and the significant disturbance of protected species within those sites. Further information can be found on [fishingnet.ie](http://fishingnet.ie)

- Under the Marine Strategy Framework Directive (MSFD), European member states, including Ireland, are required to reach Good Environmental Status (GES) in the marine environment by 2020 at the latest. Under MSFD, our marine waters must be assessed against an agreed set of standards
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SUGGESTED MEASURES:

- Forestry can improve the agriculture sector’s ability to adapt. Additional resources should be committed to facilitate incorporating climate change adaptation measures into forest management practices and in reducing the potential increased risks to forests due to the effects of climate change.

- The State has invested almost €3bn in afforestation since 1990 which has funded the planting of over 300,000 hectares.

- DAFM provide a range of guidance and management tools to support forest owners and managers which take into account climate adaptation. Examples of management tools include:
  - CLIMADAPT – tool supporting species choice and potential impacts from climate change
  - FELLING DECISION Tool – supporting landowners to decide on best time to fell which can include impacts from windthrow
  - Forestry Schemes Manual - information on range of best practice, including information on planting windows/drought
  - Forest Protection Guidelines – information on preparing fire plans, wind and drought
  - Fire – Prescribed Burning Code Practice & Fire Danger Notice Warnings
  - Wind Throw Model – probability of windthrow based on wind zones and critical height
  - Forestry Knowledge Transfer Group (KTG) Scheme - peer-to-peer discussion groups led by a professional forester to encourage participants to engage with forestry groups and professionals.

- Issue of removing the ‘replanting’ requirement which

- A key aim of Ireland forest policy is to increase forest cover

- An Taisce
- Coillte
- FH Wetland Systems Limited
- Irish Timber Growers Association
- J. D’hondt
- T. Gleeson
- T. O’Brien

- Three Pillars Network
<table>
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<tr>
<th>S. No.</th>
<th>Comments and Actions Taken</th>
<th>Supporting Organizations</th>
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<tbody>
<tr>
<td>1</td>
<td>Acts as a deterrent to future afforestation should be examined</td>
<td>From 11% to 18% through the reforestation of existing forest lands and afforestation. Sustainable forest management and a robust reforestation policy are vital to achieving this long-term aim. The general incentives and provision of grants and premiums is to convert lands to forestry. This is to ensure both value for money for the significant public funding of forestry and also to safeguard the continued environmental benefits of afforestation. In certain limited circumstances non-replanting may be considered on application and each case assessed on its merits. All felling is regulated by the Forestry Act 2014.</td>
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<td>2</td>
<td>Greater support needed for alternatives such as anaerobic digestion/use of gases</td>
<td>The Agriculture, Forest and Land Use chapter of the Climate Action Plan to Tackle Climate Breakdown contains a number of measures around cost-effective energy substitutes including actions relating to sustainable feedstocks for AD and setting a target for the level of energy to be supplied by indigenous biomethane injection by 2030.</td>
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<td>3</td>
<td>There should be greater support given to organic farming</td>
<td>The Organic Farming Scheme is supported by the Department. Action 3 in the Adaptation Plan refers to the review of the CAP and development of the development of the Strategic Plan – the organics scheme will be considered as part of this action. A new seven-year strategy for the development of the Irish organic food sector was launched covering the period 2019-2025. The All of Government Climate Action Plan commits to reviewing the Teagasc options programme which covers promotion of organics and farm income diversification.</td>
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### National Monuments Service and Built Heritage Policy

- DAFM will continue to liaise with DCHG and build on the existing cooperation between both Departments in relation to the protection of Ireland’s archaeological and architectural heritage by providing best practice policy and guidance on the range of threats to the archaeological resource posed by climate change.

### Promote the use of wood and wood products as an alternative to fossil fuels and non-renewable construction materials.

- DAFM supports the development of the forest-based sector in Ireland by developing knowledge on the wood quality and identifying possible end-use applications.
- Research projects are underway to develop processes that optimise the production effectiveness and increase the utilisation of Irish timber in construction.
- Wood biomass from Irish forests is a sustainable, renewable, carbon-neutral and indigenous source of energy. It is predominantly used to generate thermal energy (heat) but is also used to generate electricity, or both heat and electricity, in Combined Heat and Power (CHP) plants.
- Ireland’s renewable thermal energy requirement in the industrial sector is dominated by biomass, particularly in the wood products sector where wood is used extensively for process heat.

### Coillte

- One of the objectives of the Adaptation Plan is around awareness raising and communicating in an accessible manner. Therefore, a case study approach has been taken. The “Linking Art and Science” case study particularly highlights the value of communication and engagement with stakeholders.

### ENGGING WITH STAKEHOLDERS:

- Greater awareness raising and engagement from the Department is necessary and a balanced debate and more simplified information would be beneficial

### Agricultural Consultants Association
- Agricultural Science Association
- Anonymous
- Cré Compost and Anaerobic Digestion Association
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- Further consideration will be given in future communications planning regarding how the Department communicates with its stakeholders.

- Greater focus required on the training and resourcing of the public/private sector Advisory services

- The continuation of KT measures will be key in the post 2020 CAP.
  - The All of Government Plan commits to development of an advisory strategy on GHG reduction.

**FOOD SAFETY AND FOOD PRODUCTION:**

- Reliance on imports and vulnerability of supply chains
- Case Study devoted to Food and Feed Safety due to the scale of potential threats arising would be useful
- Concerns in relation to contamination of shellfish production areas.

- This issue covers both inputs and outputs associated with agri production here in Ireland and food imports.
  - The Department has a range of policies in place such as the Food Safety and Food Authenticity Strategy, there are a variety of schemes and regulations in place that ensure the quality of horticultural products such as the EU Producer Organisation Scheme and Commercial Horticulture Grant aid Scheme.
  - The EU producer organisation scheme supports producers to achieve greater market orientation by supporting measures around production and demand planning and marketing that assists producers to compete in an ever increasing competitive

**Participants:**

- F. Ryan
- FH Wetland Systems Limited
- Hacketts Agricultural Consultants
- J. Cooper
- Pat Fitzpatrick Agricultural Consultants Services
- Pat Minnock Agricultural Consultants
- Ruairí Ward Agricultural Environmental Consultant
- Transition Kerry
- Pat Fitzpatrick Agricultural Consultants Services
- Tom Canning Agricultural Consultants

- Agricultural Consultants Association
- An Taisce
- Food Safety Authority Ireland
- Hacketts Agricultural Consultants
- Irish Farmers Association
Agriculture, Forest and Seafood Climate Change Sectoral Adaptation Plan
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<p>| and international market place. • A case study on food safety and climate adaptation issues has been added to the Plan. • DAFM identified potential seafood safety issues arising from climate change impacts and communicated relevant cross-sectoral elements with the Department of Housing, Planning and Local Government, through formal cross-sectoral engagement on its Sectoral Adaptation Plans. |
|---|---|
| <strong>MONOCULTURE/DIVERSIFICATION:</strong> • Agri environmental schemes should be based on a whole farm approach • Increases in livestock numbers and the potential risks of monoculture farming | • The Department will engage with NESC and the proposed forum on agricultural diversification and climate change, with the purpose of developing a suite of new opportunities for farmers through programmes and schemes to promote diversification in agriculture. • The Department has committed to supporting the maximum possible environment and climate ambition in the post-2020 CAP – action included in the Plan linking to the action in the All of Government Plan. • Teagasc has committed to reviewing its options programme. • The Department has committed to developing a roadmap to ensure the future development of the agriculture and land-use sector will be built on environmental sustainability. This roadmap will include actions to reduce GHG emissions. |
| • Importance of tree species diversity including within species diversity, and native woodlands | • DAFM operates a package of measures aimed specifically at promoting the proactive protection and expansion of Ireland’s native woodland resource. These measures represent a key biodiversity component within Ireland’s national forest policy and include a range of approved species, provenance and |
| | • An Taisce • Sheelagh Collins • Coillte • Irish Timber Growers Association |</p>
<table>
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<th>Origin eligible for grant aid. These measures also include both the establishment of new native woodlands and the conservation of existing native woodland, which promotes the appropriate restoration of existing native woodland (including the conversion of non-native forest to native woodland), through the provision of financial support to forest holders towards the cost of appropriate works.</th>
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<td><strong>Mitigation:</strong></td>
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<td>• The Plan fails to provide meaningful mitigation options and mitigation should be given more consideration</td>
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<tr>
<td>• Clarification added to confirm that this Adaptation Plan operates in tandem with the Climate Action Plan to Tackle Climate Breakdown which includes mitigation targets and actions to be undertaken in the agriculture, forestry and land use sector.</td>
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</tbody>
</table>

| J. D'hondt |
| T. Gleeson |
| T. O'Brien |

| An Taisce |
| Anonymous |
| R. Coffey |
| Wicklow Environmental Network PPN |
### RESEARCH:
- Focussed research called for in a number of submissions though many highlighted the need for unbiased, independent research outlining both positive and negative effects of the sectors on the climate.

- The Department operates three 'public good' competitive research funding programmes for agriculture, food and forestry to support innovation and economic success across the bioeconomy.
- DAFM and its agencies also provide support for Irish involvement in the EU Horizon 2020 research funding programme.
- Action 8 in the Plan commits to engaging in additional research and to incorporating climate adaptation and resilience building in relevant research programmes.
- Action 12 in the Plan commits to continued support for focused climate research in the agriculture, forest and seafood sector. Research into Climate/Ocean Change and the distribution of fish and fisheries is highlighted as a Step for Delivery.

### CLIMATE CHANGE IMPACTS:
- Variability and increased risk to productivity/investment/employment highlighted as one of the main impacts of climate change on the sectors.

- The Department’s focus is on a whole systems approach. While the Adaptation Plan is pitched at a higher level there are a series of underlying strategies, policies and schemes in place across the department to help the sector prepare for future risks.

- Agricultural Consultants Association
- Coillte
- Horticulture Industry Forum
- Killybegs Fishermens Organisation
- Pat Minnock Agricultural Consultants
- Three Pillars Network

- Agricultural Science Association
- Glanbia
- Hacketts Agricultural Consultants
- Horticulture Industry Forum
- ICMSA
- ICOS
- IFA
- Killybegs Fishermens Organisation
- Pat Minnock Agricultural Consultants
### Issues with grass/crop growth due to extreme temperatures/drought highlighted as one of the main impacts of climate change on the sectors

- Refer to case studies which highlight impacts on the sector and outline steps for building resilience such as monitoring for pests and diseases, Value for Cultivation trials and investment in research such as Virtual Irish Centre for Crop Improvement.

### The feed, fertiliser and water supply chains were identified as particularly vulnerable to the impacts of climate change

- The water case study is also relevant here.
- The Safefood report on impacts of climate change on the dairy sector considered issues related to the dairy supply chain. It found that climate change poses many risks to the dairy supply chain and went on to identify research into possible adaptations such as breeding more heat-resistant varieties of grass and crops and livestock genetics – these adaptation actions are identified in the case studies in the Adaptation Plan and link with actions 3 and 12.

### References

- Tibor Toth Numerical Models
- Tom Canning Agricultural Consultants
- UCD
- Agricultural Science Association
- An Taisce
- Cré Compost and Anaerobic Digestion Association
- Glanbia
- ICMSA
- Ruairí Ward Agricultural Environmental Consultant
- T. O’Brien
- Tom Canning Agricultural Consultants
- Agricultural Science Association
- D. McLoughlin
- Glanbia
- ICMSA
- Pat Fitzpatrick Agricultural Consultants Services
- Ruairí Ward Agricultural Environmental Consultant
- Tom Canning Agricultural Consultants
**CURRENT ADAPTATION MEASURES:**
- Many submissions noted that no sufficient adaptation measures were currently in place
- A table outlining many of the current measures in support of climate adaptation has been added to the document.
- There are a range of climate actions being undertaken across the sector. The actions listed in the Plan are but one element of the Department’s approach to positive climate action. The All of Government Climate Action Plan includes a series of mitigation measures which support the adaptation actions identified in this Plan.

**OPPORTUNITIES FOR COLLABORATION:**
- There are opportunities for different sectors to collaborate and share knowledge to best inform adaptation actions.
- Opportunities to collaborate with other sectors are welcomed and will be followed up where appropriate.
- DAFM understands that DCHG has legislation in place (National Monuments Acts) which requires individuals to report a newly discovered monument to an appropriate state authority. BIM has provided guidance to seafood producers on this matter: [http://www.bim.ie/media/bim/content/publications/ECOPACT.pdf](http://www.bim.ie/media/bim/content/publications/ECOPACT.pdf)

**POLICY SUGGESTIONS OUTSIDE OF ADAPTATION:**
- A number of submissions contained suggestions for policy development across a range of Department policies including: CAP; Forest policy; horticulture policy; Marine Protected Areas (MPAs); Marine Spatial Planning (MSP); Seaweed/Kelp to reduce
- Suggestions will be forwarded to relevant divisions/department experts for further consideration
- DAFM is actively engaged on Marine Spatial Planning, with DHPLG (lead Department), particularly in the context of the seafood sector. In addition, DAFM provides funding through

**Supporting Organizations:**
- An Taisce
- Hacketts Agricultural Consultants
- National Federation of Group Water Schemes
- Pat Minnock Agricultural Consultants
- Ruairí Ward Agricultural Environmental Consultant
- T. O’Brien
- Wicklow Environmental Network PPN

**Other Organizations:**
- Irish Water
- OPW
- DCHG
| coastal erosion and mitigate emissions; Inland Fisheries | Ireland’s European Maritime and Fisheries Fund Programme to the Marine Institute to undertake a series of data and evidence projects to support the implementation of MSP in Ireland. DHPLG is the lead authority for MSP.  
• DAFM engages with DHPLG, DCCAE, government agencies, and NGOs on the implementation of the Marine Strategy Framework Directive (MSFD) including on matters concerning proposals for Marine Protected Areas. |