



Joint Oireachtas Committee on Environment and Climate Action

Opening statement by Sadhbh O' Neill for the Stop Climate Chaos coalition

28th March 2023

1. Introduction and context

Thank you for the invitation to attend today's session of the Joint Oireachtas Committee on Environment and Climate Action to consider the recent report as part of the national Land Use Review and the proposals for rewetting of agricultural soils under the draft EU Nature Restoration Law (NRL). My name is Sadhbh O' Neill and I am the climate campaign coordinator for Friends of the Earth, and the coordinator of the Stop Climate Chaos coalition (SCC).[1] SCC was formed in 2007 to enable environment, development, faith-based youth and social justice organisations to work together to ensure Ireland does its fair share to tackle the causes and consequences of climate change.

We have been collaborating with the Environmental Pillar and SWAN for the past 3 years on agriculture and land use policies. In April 2021 we published a comprehensive set of policy proposals to address the combined nature, water, air and climate impacts of the agricultural sector.[2] While these recommendations do not address all of the issues in the Haughey *et al* (2023) Land Use Review report recently published by the EPA, or the proposals in the draft Nature Restoration Law, **we are united in calling for sustainable agriculture and food**

policies on the one hand, and land use reforms that protect and restore biodiversity, water quality and that promote resilience in the face of unprecedented climate and biodiversity crises that are already impacting Ireland.

The most recent IPCC summary of its 6th assessment reports highlighted yet again that GHGs have an unequivocal impact on global temperature and that these emissions are driven by unsustainable energy use, land use and land-use changes (A1) (IPCC, 2023). The Summary for Policy Makers highlighted that in most global modelled pathways, land-use change and forestry (via reforestation and reduced deforestation) and the energy supply sector reach net zero CO₂ emissions earlier than the buildings, industry and transport sectors (B.6.3). In other words, to have any chance of remaining below 1.5/2 degrees a transformation in how land is managed for food, fibre and timber production, as well as for nature, will be required.

The science is clear that agriculture, forestry and other land use options provide many adaptation and mitigation benefits that could be upscaled in the near-term if the political will is there to implement these changes rapidly.

2. The role of the AFOLU sector in Ireland's climate impact

We welcome the publication of the Land Use Review report (referred to hereafter as Haughey *et al* 2023) by the EPA in recent weeks. This should be the first phase of a comprehensive strategy to develop an evidence base for future policy decisions around land use, forestry and agriculture. This review was promised in the Programme for Government as a way to ensure that 'optimal land use option informs all relevant government decisions'. The report injects a much-needed message of urgency into national climate policy discussions, as the AFOLU sector as a whole is a significant net emitter, whilst being the only significant source of potential sinks and carbon removals. While much of the climate policy debate has to date focused on

decarbonising the energy sector, it is essential that we don't neglect the vital role of the land-use sectors, whether that be agriculture, forestry, peatlands and settlement patterns, in getting to net zero emissions as rapidly as possible.

The report makes clear that major changes in our approach to managing land will be required to achieve climate neutrality (or 'net zero' emissions) by 2050. Under all of the scenarios modelled by the researchers, net zero is only achievable with significantly higher annual rates of afforestation, agricultural efficiencies, rewetting of organic soils and degraded peatlands and reduced livestock numbers **in tandem with each other**.

If, in addition to achieving climate neutrality, additional land is to be allocated for nature, bioenergy or additional cropland, the scenarios in the report show that the policy interventions become even more challenging. We do not underestimate the difficulty in getting agreement for these changes. Any one of these strands - increasing forestry, rewetting soils and peatlands and reducing livestock numbers - would be contentious but to get to net zero we will need to do all of them. The marketing campaigns of the agri-food industries, backed in many instances by the government and state bodies, have given the impression over many years that everything we do on the land is already sustainable. In fact, our land, our waters, our forests and nature are all in deep trouble. Our greenhouse gas emissions have not declined appreciably since 1990 and have risen again in recent years. Biodiversity loss has accelerated and water quality is in serious decline, due in large measure to agricultural intensification. Change will be all the more difficult because an effective environmental and climate policy has been trumped in the agricultural sector at least by the lure of export markets. As it was government policy that led to expansion of the dairy sector in Ireland since 2011, farmers cannot and must not be blamed for the resulting lock-in effects and the resistance to new approaches.

We note with alarm that misrepresentations of the potential for alternative GHG metrics as well as over-estimates of the sequestration potential of certain agricultural practices are still quite common in public and media discourse due to industry/media misinformation.[4] It has become common in some quarters to equate evidence-based climate and biodiversity action with an ideological attack on traditional rural livelihoods. In our opinion, political leadership from the Department of Agriculture and leading farming organisations has been absent. Our experience on the ground is that farmers care deeply about nature conservation and climate action, but that national policies and CAP rules have been incentivising expansion and intensification. **We believe that a new national stakeholder dialogue about achieving climate neutrality in the land-use sectors, that is inclusive and participatory, would go a long way to reframing the debate about land-use in a frank, constructive and evidence-based manner.**

Stakeholder engagement, which could take the form of citizens' assemblies, town hall meetings, community engagement processes or multi-stakeholder dialogues, must not be limited to landowners and farmers but should involve NGOs, scientists, consumers and the wider public. We are concerned that the stakeholder model used to develop agricultural strategies did not fully include scientific and ecological expertise or civil society organisations in the past. It is also key that the policy options considered by government following the culmination of phase I of the land use review address the potential for publicly owned land and that measures go well beyond what was envisaged in AgClimatise, the previous Climate Action Plan 2021 and the CAP strategic plan (see table 6.1 of Haughey et al, 2023). Public bodies such as Coillte and Bord na Móna who together hold 15% of all Irish land should play an exemplary role as public bodies in showcasing nature-based solutions that work for people, nature and the climate.

3. Setting emissions ceilings for the LULUCF sector is urgent

The recently amended Act establishes a process for the adoption of 5 year carbon budgets, and emissions ceilings to be adopted by the government which sets the ‘maximum amount of greenhouse gas emissions that are permitted in different sectors of the economy during a budget period’ (Section 6C.(1)). But despite having one of the most ambitious and prescriptive climate laws in Europe, the government has still left blank pages in the emissions ceilings, with no target yet for LULUCF and unallocated savings of 5.25 MtCO₂eq in annual savings between 2026-2030 (p.35 of CAP 2023).

This effectively means that the government is ‘flying blind’ in respect to pathways to achieve climate neutrality by 2050 for the AFOLU sectors overall. **We urge the committee to write to the relevant Ministers to demand that this target be agreed as soon as possible to give clarity and certainty to all the relevant stakeholders, and that this target should be set with a view to stabilising and reversing carbon losses from organic soils, hedgerow removal and degraded wetlands as rapidly as possible.**

We are concerned that despite having signed up to the Climate Action Plan measures, the Department of Agriculture, Food and the Marine is pulling in the opposite direction by, for example, requesting that Bord na Móna desist from rewetting activities that encroach on adjacent agricultural land. We are also aware via colleagues from European networks that the Irish position in Brussels appears to be in opposition to the proposed NRL targets for rewetting organic soils under article 9.(4). **The Department of Agriculture should be asked to publicly commit to the agreed government targets for 2030 and to support both the NRL and the Climate Action Plan measures.**

4. Establishing scenarios and pathways to net zero emissions post-2030

Ireland has agreed to achieve economy-wide climate neutrality by 2050 at the latest. However, this goal applies to the whole economy, not the AFOLU sector specifically. Given the potential

of agricultural land management, forestry and peatlands to sequester carbon, **the AFOLU sector could achieve net negative emissions well before 2050**, thus supporting the more technically challenging target of net zero for other sectors. This would ease the energy transition within equitable Paris aligned action. But we are not on track. Ireland still has not devised its Long Term Climate Strategy as required under EU climate regulations, and as I've stated above, the emissions ceilings for 2030 have not yet been finalised correctly under the Act which throws the mitigation pathways for 2030 and 2050 off course. **It is imperative that the Department of Climate Action finalises its LTS as quickly as possible to give policy certainty and a clear trajectory of policy interventions that are aligned with achieving climate neutrality for the AFOLU sector well before 2050.**

5. Carbon removals and carbon farming

I want to add a couple of points about carbon removals and storage in land and soils. Sequestration must be additional to what would happen without intervention. The LUR report shows that there is a great deal of uncertainty and variation in Soil Organic Carbon (SOC) data and relatively common changes in land use (e.g. from grassland to cropland and back again) make data collection difficult and often unreliable. It is not enough to measure the SOC and claim 'credits' in respect of what is already there. Maintaining or increasing 'stocks', i.e. fixed stores of carbon, rather than 'flows', i.e. changes/transfers, is what counts as mitigation, which must be 'additional' under IPCC and the Kyoto Protocol accounting rules. However, removals must also be permanent, which is very difficult to ensure in the context of agricultural soils (it is easier to do so with forestry though this too is fraught with methodological challenges). Furthermore, there is insufficient evidence on the condition and extent of hedgerows at present to ascertain their current or potential role in removals. The EPA's BRIAR Report estimated a

net removal rate of between 0.16% and 0.3% per year, suggesting that hundreds of km of hedgerow have been removed a year, often without the required permissions. [5]

The European Commission has recently published proposals in relation to certifying carbon removals. However, this proposal has numerous shortcomings. To be considered a true carbon removal, a verifiable process must be proven to remove carbon dioxide directly from the atmosphere and store it permanently (meaning at the very least for two centuries). In contrast, carbon farming is an extremely broad and volatile concept covering very different types of nature-based activities (mainly storing carbon in vegetation and soils) with very different estimated durations of carbon storage lumped together. That said, these various approaches all lead to carbon being stored temporarily in carbon sinks that are vulnerable to human and natural disturbances. **Policymakers should think beyond markets and instead focus on a viable alternative: activity-based finance. The EU, its member states and the private sector can financially support farmers and foresters to adopt and maintain good practices for the environment and the climate without relying on removals that are in fact only temporary.**

[6]

6. Recommendations:

- The publication of the LUR is just the beginning of what should be a national evidence-based conversation about how land use can achieve climate neutrality. We suggest that further sessions on different chapters of the LUR with the relevant experts and authors would be helpful in drawing out key learnings from the report and underlying science, and to tease out the relevant policy options and trade-offs within.
- The underlying science and practice of rewetting and restoration of degraded peatlands is relatively new and evolving. The committee should consider investigating those

agricultural practices that involve raising the water table whilst maintaining agricultural activities to diffuse fear and get the facts straight about what is possible, feasible and beneficial in catchment-specific contexts. The committee should investigate and explore the synergies with the NRL to get a picture of the ecological benefits of rewetting.

- Above all, the committee should seek assurances from the 3 lead departments - the Department of Housing, the Department of Climate Action and the Department of Agriculture, Food and the Marine that they are jointly committed to achieving the goal of climate neutrality, that they support the Nature Restoration Law and its proposed targets for rewetting peaty soils, and that they will work together to deliver the commitments in the Programme for Government and the Climate Action Plan.
- Above all, we urgently need to get on with the job of restoring degraded peatlands, rewetting organic agricultural soils and preventing the further loss of hedgerows which are the fastest and most reliable ways to prevent emissions and carbon losses.

Thank you for the invitation to speak to you today.

[1] See <https://www.stopclimatechaos.ie/>.

[2] Environmental Pillar, SCC and SWAN (2021). Towards a New Agricultural and Food Policy for Ireland – recommendations for Government. Available at https://environmentalpillar.ie/wp-content/uploads/2022/09/Towards-a-New-Agriculture-and-Food-Policy-for-Ireland-Policy-Doc_FINAL.pdf. Relatedly see O’ Neill (2021). Opening Statement to Joint Oireachtas Committee on Climate Action 15th June 2021 available at https://www.stopclimatechaos.ie/assets/files/pdf/jocca_15-6-21_scc_soneill_v2.pdf.

[3] With the exception of international bunker fuels from aviation and shipping, which is commonplace for most OECD national climate laws. Only the UK Climate Change Act (2008) provides for the inclusion of aviation and shipping emissions in the national carbon account.

[4] See Daly, H. (2022). Climate debate being poisoned by agriculture’s manufactured doubt and division, Opinion Piece *Irish Times* 1st September 2022 available at <https://www.irishtimes.com/environment/climate-crisis/2022/09/01/climate-debate-being-poisoned-by-agricultures-manufactured-doubt-and-division/>

[5] <https://www.epa.ie/publications/research/climate-change/carbon-sequestration-by-hedgerows-in-the-irish-landscape.php> See the Noteworthy report on hedgerows <https://www.thejournal.ie/nw-shear-force-pt1-5359014-Feb2021/>

[6] Carbon Market Watch (2023). ‘EU must say no to ‘carbon farming’ and yes to environmental stewardship’ press release 23rd March 2023 available at <https://carbonmarketwatch.org/2023/03/23/eu-must-say-no-to-carbon-farming-and-yes-to-environmental-stewardship/>