

Irish Organic Association

Consultation on Carbon Budgets

February 2022

Introduction

The Irish Organic Association welcomes the opportunity to share its views on the Climate Change Advisory Council's (CCAC) proposed carbon budget programme and accompanying technical report. The carbon budgets play an important role in supporting Ireland's ambitions to reduce emissions by 2030 and look towards 2050. Together with the analysis of possible pathways for emission reductions and carbon removals across different sectors, they lay the foundations for a more robust and evidence-based approach to climate policy. Below we set out some observations in the context of the ongoing development of Ireland's climate policy and the role of organic farming in supporting climate action [1-5] and wider environmental and socio-economic performance [6-9].

Note on Carbon removals

Carbon removals currently associated with the LULUCF sector are expected to play a key part in supporting climate targets and goals. In the agriculture sector, in particular, the concept of carbon farming is being explored by policymakers at the EU and national levels. While carbon farming practices, including certain practices typically pioneered by organic farmers, present promising opportunities, given the uncertainty of carbon removals, including issues such as permanence, the priority should be on absolute emission reductions in the agri-food sector. This is the focus of our submission.
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Climate Action Plan 2021

The Irish Organic Association wishes to acknowledge the ambitious and challenging targets for the agriculture sector to reduce emissions by 22-30% by the end of the decade. Furthermore, the plan identifies organic farming as a specific abatement measure through expansion of the organic farmland area but also commits to building organic research capacity. The overall success of these commitments will be dependent on the organic sector, government, public bodies, enterprise and the research community working together to ensure that systemic approaches are an integral part of the climate solution.

Proposed carbon budget programme and technical report

The proposed carbon budgets and scenario exercise confirm that the agriculture sector will be expected to undergo a considerable transformation if it is to make a meaningful contribution to reducing GHG emissions. Some observations that we would like to underline are:

- The technical report highlights that this transformation is critical not only to respond to citizens' expectations and our international commitments but also to ensure the long-term prosperity of Ireland's food and farming sector, which is more and more dependent on having a strong green reputation both at home and abroad.
- While systemic approaches to sustainable farming systems are not noted or explored in the technical report, it is clear that several changes are required for the agriculture sector to significantly reduce its emission's profile and where organic farming systems could have a positive impact. These include:

- a reduction in nitrogen application which directly and indirectly drives increases in ammonia and GHG emissions; and
 - a reduction in the absolute number of animals in the dairy and beef sectors to reduce emissions from biogenic methane.
- These two issues are inherently inter-connected as stocking rates are often not in balance with the natural carrying capacity of the farmland. Furthermore, as the report underlines applying these changes could have positive effects on biodiversity, water and air quality.
 - A strong focus is placed on the promise of new technologies to deliver future mitigation potential. Given the immediate attention climate action requires it seems more appropriate to take advantage of those scientifically-evidenced nature-based solutions that have already been tried and tested (e.g., organic farming systems). This is critical to avoid slippage in meeting our emissions reductions targets in CB 1 and 2 in particular.
 - Climate justice is an essential part of ensuring that vulnerable sectors, notably farmers, micro-business and SMEs, are empowered to sustainably transition to a more low-carbon economy and society. Although not exploring the possible alternative futures, the technical report clearly demonstrates that policymakers must explore these pathways as matter of urgency to avoid severe and sudden changes being required at a later stage.
 - The report points out that alternative agricultural activities and diversification opportunities will need to be explored and upscaled to alleviate potentially lower farm incomes and wider agri-food employment as a result of a reduction in output. The emphasis must now be on looking objectively at the merits of approaches such as organic farming that focus on value over volume. Pathways to upscale them on a progressive basis need to be identified.

Policy recommendations for climate action and the contribution of the organic sector

The carbon budget programme and annual reports of the CCAC will continue to play an important role in supporting the further development of Ireland's Climate Action Plan as well as an enhanced Ag Climatise programme. Drawing on the findings of the CCAC technical report, existing government policies and the potential for organic farming to support climate action and wider environmental and socio-economic performance, the Irish Organic Association wishes to propose the following recommendations:

1. Organic farming should be a key abatement measure under an enhanced Ag Climatise programme, with attention given to other abatement measures (e.g., associated with land and farm management) that could be combined with organic farming to maximise its climate mitigation potential, deliver other environmental co-benefits and support competitiveness.
2. Building organic farming research capacity should be done in a collaborative and transparent way that takes advantage of organic expertise and know-how. Organisations such as the Irish Organic Association are member-led and have a strong understanding of the needs and challenges facing the Irish and European organic sector to develop and expand sustainably.
3. The review of the Teagasc MACC should explore the role of organic farming systems for climate action. Assessments should carefully consider organic farming on its own merits (e.g., avoiding conventional assumptions), whilst recognising the limitations of existing research methods (e.g., capturing environmental co-benefits) [10]. This needs to be complemented by studies exploring sustainable consumption patterns and dietary change interlinks.
4. A systems approach to climate action requires GHG emissions to be considered across the whole supply chain (food, feed and fibre). This includes addressing different stages of the chain in a more transparent and accountable way. Part of this involves a greater focus being placed on robust methods of capturing emissions profiles beyond the farm gate with appropriate incentives given to businesses to improve overall performance.

5. Notwithstanding the potential for carbon farming practices to support carbon removals, including certain practices typically pioneered by organic farmers, government policy should prioritise absolute emission reductions in the agri-food sector. This is due to the uncertainty of carbon removals, including issues of permanence, measurement challenges and the ownership of data and carbon credits.
6. To address the potential negative impacts on farm incomes and wider agri-food employment, existing policies need to be rapidly implemented and complementary options explored that focus on added-value and green growth (e.g., less on volume) as advocated in the Food Vision 2030. This includes an ambitious implementation of Ireland's National Organic Strategy and forecasting and planning how to capitalise on the growing demand for organic produce.¹

References

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¹ Reporting from Bord Bia (2021) estimated that the Irish organic market was valued at approximately €235m in 2020, with an annual growth rate of about 9% between 2015 and 2020. Bord Bia commissioned research also shows that these positive trends are expected to continue with the prospect of reaching €367m by 2025 [11]. The European organic food market doubled in value between 2010 and 2019 to reach €45bn (€41.4bn in the EU [12]).