

ULSTER FARMERS' UNION RESPONSE
DAERA CONSULTATION – DISCUSSION DOCUMENT ON A
NORTHERN IRELAND CLIMATE CHANGE BILL

1 February 2021

Question 1: Which of the following high level options do you think is appropriate for Northern Ireland to take forward?

☐ ***Option 1: Northern Ireland Climate Change Bill setting interim emission reduction targets and a long term target of net zero emissions in Northern Ireland by 2050 (long term target does not consider expert climate change advice)***

☒ ***Option 2: Northern Ireland Climate Change Bill setting interim emission reduction targets and a long term target for Northern Ireland by 2050, the long term target is an equitable contribution to achieving UK-wide Net Zero by 2050 (long term target considers expert climate change advice)***

☐ ***Not sure / No opinion***

The UFU is supporting option 2; this is the only realistic option for Northern Ireland given the recent independent expert advice from the Climate Change Committee.

Option 1 is an aspirational target that does not follow independent expert advice to Government. It would be unthinkable for Ministers to ignore independent expert advice particularly as the NI Executive has highlighted the importance of following the science and advice in recent months during the COVID-19 pandemic. The CCC clearly state that following option 1 would result in a substantial reduction in livestock numbers and a much greater share of greenhouse gas removal technologies being located in NI which may not be suitable.

The Climate Change Committee advice concluding that to reach net zero in NI by 2050 would require a 'substantial reduction in output from Northern Ireland's livestock farming sector that goes beyond even the more stretching scenarios' is not acceptable to the farming community. This would have serious implications not just for farmers but for the wider rural economy and society. It would be totally unacceptable for the NI Assembly to accept a target that would result in such significant and serious consequences. Even option 2 will pose a significant challenge for the agri-food sector and the scale of that challenge should not be underestimated however, it is based on independent advice unlike option 1 which is not evidence based.

Farming is vital for NI's economy, environment, and people. Northern Ireland farmers and growers are an essential part of rural economies and communities, providing jobs and driving growth both in food production and in diversified industries such as renewable energy and

tourism. Farmers were recognised as 'key workers' during the COVID-19 pandemic and the importance of secure local food production was consistently noted.

Food and Drink is a £5.2 billion industry in Northern Ireland and is the region's largest manufacturer supporting around 70,000 local jobs (based on 49,423 total farmers and workers and 23,625 food and drink processing full time and employment agency workers). These jobs also support many more in ancillary industries e.g. transport, feed, animal health, supplies, construction etc. The NI economy relies on local food production.

A balance is needed to deliver sustainable local food production, which is the backbone of rural communities and the NI economy, but also for the environment. While GHG emissions from farms can be reduced, this can add additional costs to farm businesses and a balanced pathway with the right support is needed to ensure a sustainable future for family farms. It is also important that in tackling GHG emissions that it does not lead to other environmental trade-offs, exacerbating other environmental issues.

While agriculture is the largest emitter in Northern Ireland of Greenhouse Gas emissions – these are natural unavoidable emissions from ruminants. Currently, it is not possible to produce high quality red meat and milk without producing methane, a greenhouse gas. If Government adopts stringent targets on GHG reductions before other measures are in place, this could result in carbon leakage to other nations where environmental, animal health and welfare and workplace standards are much lower and could actually result in an increase in global emissions. EU Agriculture has increased its overall productivity by a quarter since 1990 when in the same period greenhouse gas emissions have been reduced by 20%. Beef production in Western Europe is currently 2.5 times more efficient in managing carbon emissions than the global average.

In addition to carbon leakage, cutting livestock numbers and reducing agricultural production in NI would not solve the global challenge of feeding a growing population. There must be managed trade-offs between climate, biodiversity, food production, and rural development. The ability of local ruminant livestock to turn grass and other by-products into quality protein we can eat, the maintenance of some of the most iconic landscapes and habitats must be recognised.

Reducing greenhouse gas emissions continues to be a significant challenge for Northern Ireland's farming industry but farmers do understand they have a role to play. Farmers are undoubtedly part of the solution. Along with forestry, they are the only sectors that can sequester carbon. It will not be possible for NI to reach ambitious climate change targets without working with the farming industry.

Question 2: Do you have any opinions on what would be the most important criteria to be considered when setting or updating long term and interim emission reduction targets?

X ☒ Yes ☐ Not sure / No opinion

The UFU agrees with the rationale for interim targets listed on page 30 of the consultation document. Scientific advice (including specific NI scientific and sectoral advice), social circumstances, economic circumstances and international precedents are all important. It is vital that a full regulatory impact analysis is conducted and an equality impact assessment. Targets must be practical, realistic, and achievable and must not result in exporting industry and/or environmental issues overseas.

Question 3. Do you think flexibility should be built into the Bill, to allow consideration of new emerging evidence and science on climate change (for example on long lived and short lived pollutants) when setting emission reduction targets?

☒ **Yes** ☐ No ☐ Not sure / No opinion

Flexibility must be built in the Bill to allow for new and emerging science and evidence.

For some time, agricultural organisations such as the UFU from across Europe, UK and New Zealand have been calling for the Intergovernmental Panel on Climate Change (IPCC) to consider short lived pollutants and recognise this aspect within the international inventory. GWP100, the current metric that is used, does not recognise the significant differences between short-lived gases, such as methane, and long-lived gases, such as carbon dioxide. GWP* or GWP-we, has been developed by climate change scientists at University of Oxford, and is much more accurate in calculating the warming impact of the different greenhouse gases in both the short and long term. Given the scale of the climate change crisis, the UFU considers it vitally important that the best scientific information and tools available are being used to inform and build trust in the decisions that global and domestic policy makers are taking. This includes emission reduction targets.

The development of GWP* is a clear indication of how the science is continuing to develop therefore it is vital that any future Bill includes sufficient flexibility to allow consideration of new emerging evidence and science on climate change. It is also important that the legislative processes are able to respond quickly to emerging evidence.

Question 4. Do you agree that a Northern Ireland Climate Change Bill should include a duty for 5 yearly carbon budgets to set a statutory cap (interim emission reduction targets) on total greenhouse gases that can be emitted in Northern Ireland?

☒ **Yes** ☐ No ☐ Not sure / No opinion

The UFU would support interim targets set at an appropriate interval. The UFU would agree that any carbon budgets set must be consistent with meeting any long-term target whilst ensuring that NI remains competitive in a global economic market.

Carbon budgets must be achievable, practical, and start slowly to allow businesses and society to evolve and move on a trajectory towards long term GHG targets and avoid economic

shocks. This will allow time for farmers to adapt and for science and technology to evolve. Interim targets must not result in a detrimental impact on our ability to produce high quality local food or jeopardise UK food security. It is vital that alongside carbon budgets there are clear commitments on communication and knowledge transfer to help deliver the required carbon commitments. A range of policy options will have to be considered and Government support will be needed.

Question 5. Should provision for reporting on adaptation measures by ‘major player’ public bodies be included in a Northern Ireland Climate Change Bill?

X ☒ Yes (which major player public bodies and why?) ☐ No ☐ Not sure / No opinion

The UFU would suggest that all major player public bodies particularly Government Departments, Executive Agencies and Councils should be required to report on adaptation measures.

The UFU believes that reporting on adaptation is a key element of this proposed Bill. Services provided by NI public bodies are at risk from climate change and the public sector must become better prepared and help build resilience across society. Reporting levels could vary depending on the scale and size of the organisation and risk of climate change to that organisation.

Question 6. Should provision for reporting on mitigation measures by ‘major player’ public bodies be included in a Northern Ireland Climate Change Bill?

X ☒ Yes ☐ No ☐ Not sure / No opinion

All major player public bodies particularly Government Departments, Executive Agencies and Councils should be required to report on mitigation measures. As all sectors of society will be required to take action to mitigate climate change, it is important that the public sector plays their part and sets an example for wider society.

Question 7. In addition to continuing to avail of the expertise of the UK Climate Change Committee, should we also include provision in the Bill, for an independent Northern Ireland advisory body on climate change?

X ☒ Yes ☐ No ☐ Not sure / No opinion

The UK Climate Change Committee is a well established organisation that currently provides expert advice to Government and will continue to do so. However, it is recognised that there would be a benefit of having more local expert advice reflecting the specific circumstances in Northern Ireland. The UFU propose that sector specific advisory committees are established

to report and advise on the specific economic, environmental and social circumstances in NI for each of the reporting sectors (agriculture and LULUCF should be combined). In NI there is a well-established Greenhouse Gas Industry Partnership (GHGIP) that was set up in 2008, is facilitated by DAERA and has produced and delivered on industry Action Plans to reduce GHG emissions since 2010. The group represents a wide range of organisations that are representative of the agri-food industry, the environmental lobby and includes researchers and CAFRE and could provide local expert advice on the CCC recommendations relevant to agriculture. In the agri-food sector alone the range of sectors e.g. dairy, arable, horticulture, red meat etc and how each adapt and mitigate climate change is specialised therefore it would be impossible for a NI level Climate Change Committee to be able to provide the necessary expert advice. In addition, the GHGIP works through four specialist sub-groups to further develop this work and it is this level of scrutiny and expertise that we believe will be required to deliver an ambitious climate change target that is option 2.

It is absolutely vital that in order to tackle emissions from the agri-food sector a partnership approach is developed with Government and academia working alongside the agri-food industry to collectively deliver for both the sector and the environment.

Question 8. Do you have any other comments in respect of the issues raised in this discussion document?

☐ Yes ☐ No ☒ Not sure / No opinion

Question 9. Are there any important issues you feel have not been adequately covered at this early discussion stage?

☒ Yes ☐ No ☐ Not sure / No opinion

It must be recognised that agriculture is unique. It supplies food, stores carbon and generates renewable energy. Farming is also on the frontline of climate change impacts, being particularly vulnerable to extreme weather events and therefore must be assisted to adapt to a changing climate.

While climate change is affecting every farmer across the world, the global demand for food is increasing and, according to UN forecasts, the number of mouths to feed will rise to nearly 10 billion by 2050. Agricultural production will need to increase by an estimated 60%, according to the UN Food and Agriculture Organisation, with strong demand projected for

commodities such as milk and meat. NI's grass-based livestock production systems are among the lowest GHG emitters in Europe per unit of production and are well placed to deliver sustainable food production in the future.

The agriculture and forestry sectors are also unique in their ability to remove GHG emissions from the atmosphere. The agricultural and forestry sectors are the only sectors which can do this and therefore the sectors are a vital part of the journey towards net zero; NI will not deliver a net zero target without the agri-food sector. Carbon sequestration must be a key element in future climate change policy and further discussions are required. More detailed knowledge of the carbon sequestration potential is needed in Northern Ireland and a baseline established.

It is essential that a programme of climate research evolves in Northern Ireland, specifically for the agricultural sector which plays such an important part in the NI economy. The NI Executive must provide support for research and the development of innovative technologies as well as adopting a framework that allows this to be progressed in a timely manner to allow businesses to develop and remain competitive while delivering reductions.

The UFU key asks are:

- Support to deliver improvements in farm productivity and efficiency, this be necessary, to enhance agriculture's resilience and reduce greenhouse gases.
- Strengthen research that supports the land-based sector and ensure that developments and breakthroughs are effectively and rapidly translated into commercially viable advice for farmers.
- Unlock the huge potential contribution of land-based renewables
- Ensure that carbon accounting systems 'credit' the added mitigation benefits that agriculture can deliver, through carbon storage/sequestration and renewable energy export.
- Use sound scientific evidence when including agriculture in future national and international climate agreements.
- Establish baseline figures for NI in terms of agricultural emissions and carbon sequestration potential.
- Invest in research and new technologies which are needed to help the industry move towards net zero.
- Ensure that the DAERA GHGIP continues to provide leadership to the agricultural sector and raises awareness of the climate change challenge, mitigation measures, carbon sequestration and adaptation.