

12 Recommendations for Agriculture in Ireland's *National Energy and Climate Plan 2024*

1. **Public participation in preparation of Ireland's NECP must be ensured by the Department of the Environment, Climate and Communications (DECC).** Respondents require plain language documents and sufficient time to express views that will be fully considered in revisions toward the final NECP.
2. **Acknowledge the evident failure of industry-led Government policy and Teagasc advisory measures since 2010, in agriculture, forestry and land use (AFOLU).** Policy-driven dairy expansion has increased greenhouse gas emissions, cancelling out the ineffective, voluntary, technical measures to date.
3. **Ireland's 2023 NECP must include a detailed plan to 2030 and 2050 for low-carbon transition to a balanced agroecological system.** Ireland's current agri-food system is severely unbalanced toward high emissions, intensive meat and milk production for export. This has failed the majority of small farmers and the natural environment. System change to agroecological methods and more space for biodiversity will be more socio-economically sustainable for farmers, less polluting for nature, and can produce more food for society with far less waste.
4. **The NECP needs to plan for a just transition.** There is a risk that the necessary transition to a climate neutral society may neither be sustainable or just, unless environmental and socio-economic sustainability are rapidly hardwired into relevant policies. Integrating principles of a just transition, adaptation planning and agroecology into climate policies can deliver a fairer and greener society, as well as a more resilient farming future.
5. **All NECP agriculture plans must align with meeting Ireland's legally binding five-year carbon budgets and meeting the deeper 42% national emissions reduction required across for agriculture, transport, and waste.** The NECP must quantify the near-certain need to further cut the *Sectoral Emission Ceilings* for 2026–2030 (and onwards) in all sectors, including agriculture.
6. **NECP targets for agriculture must ensure early, deep, and sustained cuts in annual methane emissions (mostly from cattle and sheep).** This is crucial to achieve Ireland's fair-share climate action. Total methane is primarily related to total milk and meat output, so production quotas are highly effective mitigation measures, as shown by the sharp rise in dairy methane emissions that has been strongly coupled to rising milk production since ending the milk quota.

7. **The NECP needs to reduce high current agriculture emissions through diversification away from intensive animal farming rather than land use offsets from “carbon farming”.** Land-based CO₂ removals to forest and soil are of very limited mitigation value in meeting climate targets: they are costly to verify, not equivalent to cutting fossil carbon use due to their impermanence, and are only relevant in addition to cutting methane warming from cattle farming and animal manure. However, rewetting of organic soils is an important action to reduce land use emissions and in parallel with changes in forestcover can deliver very important ecological, biodiversity and water quality benefits.
8. **Enforce ecological quota limits on national and by-catchment use of nitrogen (from fertiliser and feed) to ensure increased local nitrogen cycling through agroecological methods.** Milk and meat quotas act as effective nitrogen quotas. Reduced cattle production can increase net system food output and efficiency, cut GHG emissions, and limit nitrate and ammonia pollution.
9. **Apply the “polluter pays” principle:** Profitable and polluting livestock farms must lead from the front and be prioritised for herd reduction where it is evident that the environmental carrying capacity of the land has been exceeded. The greatest polluters must shoulder the burden for there to be a just transition with other farmers. Perverse agricultural subsidies should be identified and withdrawn.
10. **Ireland’s must transform commercial forestry and tree cover policies.** Radical change is needed in Ireland’s forestry sector to address serious environmental legacy issues, especially biodiversity loss, and to ensure it can contribute positively to climate mitigation and adaptation.
11. **Advisory assessments have overlooked major bioenergy sustainability failures** from poor forest management, biomass imports, and methane losses in anaerobic digestion. Bioenergy can increase emissions and pollution unless strong regulatory safeguards are in place. Solar and wind are far more land efficient.
12. **The NECP must ensure energy, agriculture and land use planning coherence with existing national policy objectives and environmental boundaries.** Urgent action is needed to ensure agriculture’s rapid compliance with the ammonia ceiling and the Water Framework Directive. A coherent land use plan needs to protect nature and chart a just transition path to a sustainable, food secure, biodiverse and resilient agri-food system.

The draft National Energy and Climate Plan, released in December 2023 for public consultation, fails to address any of the above points adequately.