



Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Chaile Sheáin
Contae Loch Garman, Éire
T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

Consultation on Carbon Farming
Climate Change & Bio-Energy Policy Division
Department of Agriculture, Food and the Marine
Old Knockmay Road
Portlaoise, Co. Laois
R32YK81

28-11-2025

EPAC Reference No: EPAC-3525

Re: Principles for Developing Carbon Farming in Ireland

Dear Climate Change & Bio-Energy Policy Division,

The Environmental Protection Agency (EPA) welcomes the opportunity to comment on the consultation "Principles for Developing Carbon Farming in Ireland."

Carbon farming, as part of the Carbon Dioxide Removal framework, is internationally recognised as part of the IPCC AR6 WGIII scenarios necessary to limit global warming¹. As stated in the latest State of the Environment Report, the EPA recognises the role of Agriculture as an integral part of the fabric of Irish society, while also understanding that our food systems are currently not supporting the achievement of our sustainability targets². As of 2023, agriculture is the main source of greenhouse gas (GHG) emissions, at 20.7 million tonnes of CO₂ eq. or 37.7% (excl. LULUCF)³.

Soil is a key area in terms of carbon storage, regulation of water quality and flow, and for agricultural uses. Our current land uses are a net source of greenhouse gas emissions, at about 3.9 million tonnes of CO₂ eq. or 6.6% (incl. LULUCF), and current practises are also negatively affecting water quality and biodiversity. Therefore, the inclusion of the EU Carbon Removals and Carbon Farming Regulation (CRCF – EU/2024/3012) in the principles ensures alignment with EU developments, and

¹ [IPCC AR6 WGIII Factsheet CDR.pdf](#)

² [Ireland's State of the Environment Report 2024](#)

³ [Ireland's Final Greenhouse Gas Emissions 1990-2023](#)

offers an opportunity to improve environmental outcomes and strengthen farmers' economic resilience. However, it is the view of the EPA that the draft principles require additional detail.

Baselines and Additionality

Baselines must be representative and will need to be carefully considered and should be set based on an appropriate and consistent framework at national, farm and project scales. Where farmers have previously implemented emissions reduction or sequestration actions it should be clearly stated whether those actions are included or that actions are only accounted for after a particular start date.

Quantification

Monitoring approaches should be cost effective and environmentally appropriate. Detailed measurement data (such as soil or water sampling) is likely to require significant resources over a prolonged time period to accurately measure environmental outcomes. Tier 3 methodologies would require significant research investment. However, Tier 2 or inventory-based approaches (e.g., France's BasCarbone) may be more practically applicable, at least in the medium-term.

Longevity

Carbon farming outcomes will only be beneficial if they are sustained effectively into the long-term. Greenhouse gas sequestration rates in forestry and rewetted peatlands for example, requires several years to achieve positive results. These outcomes can also be reversed immediately if drainage or other changes in land management practices take place following the cessation of a scheme. The objective of no net loss of sequestered carbon in the long-term should be contained in the principles.

Overall, collaboration among farmers, policymakers, and stakeholders is essential to balance ambition with resources and ensure consistent funding and expertise for a successful carbon farming programme.

The EPA would be happy to meet your team to discuss these points further.

Yours sincerely,



Dr. Conor Quinlan,

Programme Manager, Climate change,

Environmental Protection Agency