



ICOS Submission to the Consultation on the Third Review of Ireland's Nitrates Action Programme 28 April 2017

The Irish Co-operative Organisation Society (ICOS) welcomes the opportunity to contribute to the consultation on the third review of Ireland's Nitrates Action Programme.

ICOS is a co-operative umbrella organisation that serves and promotes commercial co-operative businesses and enterprise, across multiple sections of the Irish economy. We represent 130 co-operative businesses that collectively have over 150,000 individual members, with a combined turnover of €14 billion and employ more than 12,000 people in Ireland. The Irish co-operative sector is geographically spread right across rural Ireland with interests across the rural economy. For example, Irish dairy co-operatives are multi-purpose operations with interests in milk processing, liquid milk, consumer foods, agri-trading and feed milling. The Irish dairy sector is predominately farmer owned and controlled, with 10 milk processors and 14 milk purchasing co-ops. Irish dairy products are exported to markets throughout the world, valued at €3.38 billion in 2016. There are also over 60 livestock mart co-ops throughout Ireland, which provide a valuable alternative market outlet for livestock farmers, with a collective turnover of over €1 billion.

First and foremost, **ICOS reiterates our full support for the objectives set out in the Food Wise 2025 Strategy including the principle of sustainable intensification.** Ireland has a significant competitive advantage in sustainability through our grassland based production system. That said, we recognise the need to maintain and enhance further our reputation as a global leader in the export of healthy, traceable and environmentally sustainable dairy and meat produce.

ICOS acknowledges that the Nitrates Directive is an important measure that contributes to the achievement of good water quality. The main provision limits the spreading of livestock manure and slurry containing more than 170kg of nitrogen per hectare per year. A derogation introduced in 2007 and continued in 2010 and 2014 permits individual grassland farms to spread up to 250kg of nitrogen per hectare per year. The number of approved derogation applications has grown from 4,133 in 2007 to 6,800 in 2016, with the majority of these applications from the dairy sector. The derogation is applied for annually and notably is granted under strict conditions, including soil sampling and analysis, the provision of a fertilisation plan and the provision of fertiliser accounts.

The continuation of Ireland's derogation without further conditionality is essential for the future viability of the Irish dairy sector. It is important to note that Irish soil and climatic conditions allow for a long grazing season which justifies the continuation of Ireland's derogation. In this respect, we differ significantly from other EU Member States in relation to compliance with the Nitrates Directive.

ICOS and the dairy sector is fully committed to ensuring the adoption of best practice at farm level to help improve water quality standards. **The development of the National Sustainability Dairy**

Forum is an example of a unique joint industry, farmer and government approach. The National Sustainability Dairy Forum will include in its initial phase six co-operative led pilot projects to improve nutrient management planning and on farm source pollution.

This important initiative will complement the existing Agricultural Catchments Programme (ACP) operated by Teagasc. The ACP involved 320 farmers across six catchments and is an invaluable source of information on best practice, which is vital for knowledge transfer to the wider farming community. In addition, the Common Agricultural Policy incorporates several measures that protect water quality. This includes basic payment greening provisions, cross compliance measures related to the Nitrates Directive and the requirements to maintain land in good agricultural and environmental conditions. In addition, the Rural Development Programme includes measures such as GLAS, TAMS and Knowledge Transfer programmes, which contribute towards improved water quality standards.

Another key provision of the Nitrates Directive is the introduction of closed periods whereby the spreading of any fertiliser during certain months of the year is prohibited. While acknowledging the overall purpose to minimise the potential of nutrient loss during the period when the risk is highest. Nevertheless, **ICOS believes that flexibility should be allowed under certain circumstances due to weather variability.**

Finally, ICOS looks forward to engaging with the Department of Housing, Planning, Community and Local Government, together with the Department of Agriculture, Food and Marine on this important topic including the review of Ireland's Nitrates Action Programme and the development of Ireland's River Basin Management Plan 2018-21.

Martin Keane
President
April 2017