

Nitrates Consultation
Water Advisory Unit
Custom House
Dublin 1

15th January 2021

Fourth Review of Ireland's Nitrates Action Programme: Stage 1 Public Consultation Paper

A Chara,

The Irish Co-operative Organisation Society (ICOS) is pleased to respond to the stage 1 public consultation on the review of Ireland's Nitrates Action Programme.

ICOS is the umbrella body for over 130 co-operatives in Ireland – including the Irish dairy processing & milk purchasing co-operatives, livestock marts and other rural based enterprises – whose associated businesses have a combined turnover in the region of €14 billion, with some 150,000 individual members, employing 12,000 people in Ireland, and a further 24,000 people overseas.

The continuation of Nitrates Derogation is extremely important for the Irish dairy industry. In 2020, there were 6,400 derogation applications, the vast majority from dairy farmers. A further 4,500 farmers export livestock manure to remain compliant with the stocking rates limits in the regulations. The Nitrates derogation allows Irish dairy farmers to take advantage of our natural grass-based system by permitting a more moderate stocking rate. This is subject to additional conditions which farmers must comply with and in recent years the derogation has been used to initiate wider environmental improvements in biodiversity, greenhouse gases and ammonia. The Irish dairy industry supports over 60,000 direct and indirect jobs in Ireland including 18,000 family farms and a further 24,000 jobs abroad. The derogation is an extremely important factor in supporting employment across the rural economy with dairy sector exports valued at €5.2 billion in 2020. Ireland exports 92% of its dairy output to over 120 countries worldwide.

The ICOS submission directly responds to the consultation paper queries and sets out the steps undertaken to date by the Irish dairy sector and high-level principles, which the sector has been considering to improve agricultural sustainability. We have jointly prepared and submitted a separate response with our industry colleagues under the Dairy Sustainability Ireland initiative.

Steps to Date by the Irish Dairy Industry

There has been an increasing focus on agri sustainability and all its aspects over recent years, and this clearly needs to be intensified and accelerated. Some of the main steps which have been taken by the sector are set out hereunder.

- The sector has been supportive of DAFM sustainability approaches and programmes, TAMS and GLAS, and of the Bord Bia Origin Green programme most notably the Bord Bia Sustainable Dairy Assurance Schemes (SDAS) which the entire dairy sector signed up to and delivered upon. The sector is supportive of the review of SDAS currently underway.

- The Dairy Sustainability Ireland Initiative was established in late 2016 – a collaborative framework to address sustainability in the dairy sector, seeking to bring a whole of Government/whole of sector approach to same.
- The dairy sector has been strongly supportive of Nutrient Management Planning and has promoted and provided subsidised soil testing programmes for dairy farmers on a continuing basis.
- Individual sustainability Initiatives have been brought forward by different processor co-ops and are reviewed/updated on a continuing basis.
- The ASSAP programme was established as an innovative Government/industry collaborative initiative to run from 2018 -2021. it is a new approach to achieving improvements in water quality and wider sustainability by providing free agricultural sustainability advice from dedicated sustainability advisors to farmers operating in the 190 'Areas for Action'. This four-year programme supports the goals of the Food Wise 2025 strategy, facilitating increased productivity hand-in-hand with a more sustainable sector. The sustainability and efficiency gains will be achieved through three main areas of focus on farm:
 - I. Improved nutrient management with more targeted use of slurry and fertiliser
 - II. Better farmyard management practice
 - III. New approaches to land management to reduce nutrient losses in critical source areas.
- The ASSAP programme has a resource of 30 Agricultural Sustainability Advisors. 20 Advisors are being jointly funded by Department of Agriculture, Food and the Marine (DAFM) and the Department of Housing, Local Government and Heritage. A further 10 Advisors are being funded by the dairy industry who work within the dairy processing structures. All Advisors have received comprehensive training to ensure a unified and consistent approach under this programme. These 30 Sustainability Advisors work alongside 60 water scientific and community specialists in the local government waters programme – LAWPRO, who provide targeted advice on the particular issues arising in particular water bodies.
- Provision has been made for loan funding for sustainability capital works and equipment supply by dairy farmers in dairy processor loan funding programmes.
- A Switch programme to reduce N in dairy areas was initiated by dairy processors and commenced in mid-2020 – with five key switches promoted. Copy of key messages attached as agreed with Teagasc. This has begun to be implemented.
- Discussions commenced with Teagasc in late 2020 and agreement reached to progress four new approaches on N reduction, – (1) a new factsheet on slurry management to be prepared by Teagasc and communicated by the processing co-ops – this is in preparation, (2) a new programme on liming to be developed and promoted by industry, (3) a new structure of slurry management advice to be prepared by Teagasc and delivered by Teagasc and the Processors, and (4) the joining up of electronic advices/apps i.e. Nutrient Management Planning online and Pasture Base, which are the main apps used by farmers for nutrient management planning and for managing grass growth – this would provide farmers with an integrated app which would incorporate sustainability management with best production management, because of the overlap /win-wins with both production and sustainability. This is being considered by Teagasc at present.

In support of the foregoing, and attached for information, are a recent Dairy Sustainability Ireland presentation on ASSAP and approaches and considerations to improving dairy sustainability, an interim report on ASSAP prepared by Teagasc and Dairy Sustainability Ireland, and a summary of the Switch messaging on N reduction. Separately, proposals have made for new measures to support water quality improvement for the next River Basin Catchment Plan, as part of the further review of the ASSAP programme by Teagasc and Dairy Sustainability Ireland.

High level Principles

The ASSAP programme is at early stages of implementation and much work has been done in developing operational processes and structures, in advising and raising awareness, in building trust with all stakeholders and critically in working in the Priority Areas for Action (PAA's) to support the achievement of water quality improvements. Clearly the processes and structures which have been invested in have the potential to be used to further progress water quality improvement in areas of N and P excess and in addition to support the achievement of other on-farm sustainability goals. Accordingly, the expansion of ASSAP in such areas should be considered.

In relation to knowledge transfer and to advisory services re. sustainability, it is important that all farm advisory services and all knowledge transfer mechanisms should be utilised in support of the achievement of all agri sector sustainability goals – water, climate, ammonia, bio-diversity and soil management, with ASSAP also part of this. This needs to be accelerated and strengthened. The recent announcement of new funding for the sustainability training for independent agri advisors is an important first step. Focussing advisory/knowledge transfer on the issue of N and P excess generally, as well as to support farmers in such areas to implement best practice re. N and P excess should be considered. The mainstreaming of sustainability advice across all advisory and training platforms should be accelerated - Teagasc, DAFM, co-op, and private and to also include farm contractors.

The most recent EPA data suggests that there are similar type problems arising in aggregated soil type areas with similar farming systems, most notably excessive N use in dairy areas, and P in other areas. Early results from the ASSAP farm assessments would support this.

Accordingly, it is suggested that macro sustainability messaging/communications should be developed and delivered to these particular aggregations to address N and P particularly. It is noted that as a first step, the processing co-ops/Dairy Sustainability Ireland, and Teagasc will co-operate in the Switch programme focused on dairy areas, targeting the reduction of chemical N, the increased use of lime, the over sowing of clover, the use of LESS technology and the spring application of slurry. It is suggested that this approach should be considerably strengthened across the agri-sector.

Equally, awareness raising has been an important part of the LAWPRO and ASSAP activities - working with communities and with farmers, with which there has been some success and it is suggested that the strengthening of the sense of ownership by communities and by farmers of waters should be encouraged and progressed in line with the principles set out in the 2nd River Basin Management Plan.

At this early stage, it is suggested that whole of government/whole of sector principles of operation, of which ASSAP is a small example, offer significant potential in the addressing of water quality improvement as well as addressing broader agricultural sustainability challenges as set out in national and EU policy requirements. It is agreed that it is critically important to have joined up approaches between public and private sectors across all elements to maximise sustainability co-benefits to the environment. In such context, the alignment of policies and funding, and advisory and knowledge transfer programmes, public and private sector, in support of the achievement of integrated sustainability requirements should be progressed.

It is now well accepted that there are considerable co-benefits and interdependencies for agriculture in addressing water quality, climate change, ammonia and bio-diversity and indeed also farm incomes and farm productivity, and this confirms the value of an integrated approach to on-farm sustainability. It is suggested that this approach should now be further progressed. In this context, the dairy sector's submission on the Ag-climatise consultative process in February 2020, suggests some constructive approaches to address broad sustainability concerns and paragraphs 10, 11, 12, 13, 14 and 15 of that

submission are relevant – copy of submission attached. In this context also, the Teagasc Signpost Farm initiative to address broad sustainability challenges is a good template and the dairy sector has committed to strongly participate in, and to financially support this programme on a joint basis. The question of the expansion of and more rapid roll out of the Signpost Farm initiative should be considered.

Consultation Paper Queries

Current Requirements

- **Cattle access to watercourses**

The current regulations prevent cattle access to watercourses, effective from the 1st of January 2021, on farms with a grassland stocking rate of 170kg N/ha or above. Where livestock have direct access to water, a fence shall be placed at least 1.5 metres from the top of the riverbank or water's edge by the 1st of January 2021. This is an existing requirement for farmers participating in the Green Low Carbon Agri Environment Scheme (GLAS) and is extended to farmers availing of the Nitrates Derogation. We believe that the current requirements are sufficient, as a gap of 1.5 metres is more than enough from a flowing watercourse. A different approach for inland drains is required after appropriate consultation. We note the benefits of fencing off watercourses to protect water quality and support the principle of ensuring the right measure in the right place. As this is a new requirement for farmers under the Nitrates Derogation and it is appropriate to allow new changes, time to be implemented, monitored and supported. The identification of watercourses on the OSi 1:5000 scale maps has led to some confusion with farmers reporting difficulties accessing the appropriate maps online. The lack of clarity as to what qualified as a watercourse and whether the rules apply to existing or new fencing has caused some difficulty. It is suggested that these issues need further communication to both farmers and their advisors. Bearing in mind the challenges related to COVID-19 and the traditionally busy calving period and constraints on labour on dairy farms, a degree of flexibility or a 'bedding-in' period is needed in terms of the implementation of new requirements on farms in early 2021.

- **Phosphorous Build-Up**

We believe that the provision allowing for P build up on farms with stocking rates of 130 kg N/ha or above should be continued. Overall soil fertility in Ireland reached a very low status between 2013 to 2015 with just 10% of soil samples showing good overall fertility in terms of pH (>6.2), P and K (\geq index 3) status. The review found that 62% of Irish soils were in P index 1 or 2. The build-up of P on low index farms enables optimum soil fertility in line with good farm sustainability practices. Farmers availing of P allowances are required to undertake a nutrient management plan, including soil pH and participate in a Knowledge Transfer programme, which should be continued.

- **Record Keeping:**

We welcome a proposal for a more streamlined process for record keeping, maximising the use of appropriate technologies to free up additional time for farm advisors, whose time is often taken up with paperwork on behalf of farmers. It is important that this issue has been recognised by DAFM and DHLGH and we welcome improvements, mindful of the requirements of the GAP regulations.

It is noted that a regime similar to that for pesticides where sales are recorded on a farm-by-farm basis will be considered. It is important that DAFM fully consult with stakeholders prior to changes being implemented. The sector is supportive of the broad principles of the Ag Climatise and the EU Farm to Fork Strategies, which set out very ambitious targets to reduce overall fertiliser usage. However, it is vital that the reporting of fertiliser sales, if implemented, does not result in excessive costs at local level. The continued emphasis must be on the correct fertiliser application based on soil testing and nutrient management planning.

- **Training (for farmers and advisors)**

We are supportive of increased requirements to participate in training courses or knowledge transfer events for all farmers and advisors, as this will have a positive impact on water quality. As a starting point, no farmer sets out to cause environmental harm, as farmers are proud custodians of the natural environment. Education should never be seen as a burden and the sharing of best practice will result in better outcomes. The readiness of farmers to engage in knowledge transfer on water quality has been verified by the findings of the 1st interim report on the ASSAP programme published in June 2019. The ASSAP interim report found that 96% of farmers contacted in the Priority Areas for Action (PAA's) were willing to engage in the programme. The mainstreaming of sustainability advice across all advisory and training platforms should be accelerated – Teagasc, DAFM, co-ops and private advisors and to also include farm contractors. We believe that future knowledge transfer/training activities should incorporate the following points:

- The interpretation of soil test results is critical. Soil test information forms the basis of fertiliser and lime advice and decisions regarding fertiliser types and formulations. There is huge room for improvement in this area.
- Mainstreaming the use of online nutrient management planning tools.
- Nitrogen Use Efficiency (NUE) is a key metric to track progress at farm level. Dairy farmers have proven to respond well to performance metrics that deliver economic, social and environmental improvements to their farm businesses such as grassland management and milk solids. Developing a greater understanding of a farms individual NUE and setting improvement targets should be part of future training/upskilling. One suggestion might be for Teagasc to develop a knowledge transfer campaign for NUE similar to that of Grass10 to develop a wider understanding of NUE by farmers.
- New training initiatives must ensure there is continued engagement with discussion groups in particular.
- Dairy co-op farm advisors including co-op ASSAP advisors, co-op branch staff/managers, dairy advisors should be included as part of new training initiatives, alongside Teagasc and other private farm advisors.
- An understanding of the nutrient pathways for N & P and mitigation measures required.
- Under the ASSAP programme, streamside visits have proved extremely effective, generating very good engagement by farmers. Mindful of current COVID-19 restrictions, streamside visits in local catchments could be included in future training.
- With the encouragement for the use of contractors to spread the vast majority of slurry particularly in a busy spring period, it must be made a priority that contractors are included in any form of training that will provide them with the appropriate knowledge when applying nutrients to varying soil types, awareness of buffer zones and an understanding of the nutrient pathways for N & P. Contractors must also be in a position to train other members of staff.
- The testing of slurry for nutrients available by farmers/contractors on farm should be considered and built into the recording on nutrient management tools.

The dairy co-op sector is committed to developing progressive knowledge transfer projects to support their members in the area of water quality and existing communication channels including monthly newsletters, websites, social media channels and SMS messaging systems have been used for this purpose. The sector has several long-established farm development joint programmes with Teagasc using a range of advisory methods employed including discussion groups, monitor farms and targeted visits. Soil fertility and NMP's are key components of the joint programmes. This area of action will be expanded and complemented by the Signpost Farm initiative currently under development. The Signpost Farm initiative will include up to 100

demonstration farms and the roll out of the Signpost Farm Advisory Campaign. Issues such as optimising soil fertility, reducing fertiliser use and adequate slurry storage will be important areas of focus.

As stated, the co-op sector has developed a targeted communications plan under the DSI initiative to reduce N excess called the Switch communication campaign focussed on 5 key areas:

- Switch 1 - Switching from Low to High Soil Fertility and Lime - the most productive investment;
- Switch 2 – Switching €30/ha from your fertiliser bill to your pocket;
- Switch 3 – A switch from splash plate to Low emissions slurry spreading (LESS);
- Switch 4 – Switch to spring application of slurry and
- Switch 5 – Switch from Grass-to-Grass Clover.

- **LESS slurry spreading**

Low Emission Slurry Spreading (LESS) is a proven technology with co-benefits for climate change, water quality and air quality. The Ag Climatise strategy has established a target of 60% of all slurry spread by LESS by 2022; 80% by 2025 and 90% by 2027. The method of slurry spreading is now a requirement for all derogation farmers. The benefits of spreading slurry with LESS equipment includes reducing N losses and increasing the N availability from slurry, a faster return to grazing, ability to apply slurry on heavier grass covers and a more accurate application of slurry nutrients, thus replacing chemical fertilisers.

However, LESS equipment is more expensive than the traditional methods of slurry spreading. DAFM has recognised the additional costs associated with LESS equipment through the provision of TAMS grant aid under the CAP, providing grant support outside the normal investment ceiling, which is a significant benefit for dairy farmers. The sector believes it important that the availability of grant aid be kept open for a transition period under the new CAP, especially given delays around the delivery of LESS equipment.

In addition to grant aid, several dairy co-ops have partnered with lending institutions by offering low cost/flexible finance through the MilkFlex and FundEquip schemes to allow suppliers make investments in LESS equipment.

The use of LESS equipment by agricultural contractors should be encouraged as a significant number of farmers will use a contractor to spread their slurry to reduce their machinery costs. It is suggested that DAFM develop a package including low-cost finance/tax incentives to support the contractor sector so as to transition the sector away from the use of traditional splash plates. It is very important to note that the use of LESS equipment is more difficult when soil trafficability is poor. In turn, this will necessitate greater support and investment in slurry storage to ensure a greater buffer when soil and weather conditions are unsuitable for land-spreading. LESS equipment is heavier on the land and requires good ground conditions that are seldom available in the earlier part of the year.

- **Nutrient Management Planning**

It is agreed that mainstreaming the use of online nutrient management planning tools will be a key component of any successful Nitrates Action Plan and should be linked to the training programmes specified by DAFM. NMP online tools are important innovations designed to help agri-professionals and farmers to assess the nutrient balance of Irish farms and devise a fertiliser management programme that will optimise soil fertility and ensure compliance with the limits set under the Nitrates Regulations. GPS mapping technology is used to produce a farmer friendly

nutrient management plan along with colour coded maps. It is important that farmers make better use of new technologies such as the Teagasc NMP online tool and therefore additional training/upskilling will be required. Grassland management can be further augmented through the use of Pasture Base Ireland, an internet-based grassland management tool and the use of grassland technologies such as grass measuring and budgeting.

It is considered that the sectors proposals to amalgamate NMP online and Pasture Base would have major water quality benefits particularly re N excess reduction. In addition, it is considered that the review of SDAS to improve farmer feedback reports would be beneficial. The farmer feedback report received by farmers post a Bord Bia audit is very beneficial and should be utilised more by advisors/farmers as a starting point when talking about the sustainability challenges on farm – i.e., carbon foot printing, water quality, nutrient use etc. This report can be followed up with a Carbon Navigator tool to showcase to the farmer the benefit for example moving towards spring slurry application in terms of money saved and GHGs reduction at farm level. Training from Bord Bia to advisors on how to assess the farmer feedback reports would need to be considered.

- **Assessment of Tables in Schedule 2**

It is noted that the scientific evidence demonstrating that the excretion rates for the dairy cow should be updated from 85kg/N to 89kg/N, which is effective from the 1st January 2021. As a result, some farmers will need to adjust due to the identified need to change excretion rates for dairy cows. Compliance with the regulations on this point can be achieved through adjusting stocking rates, exporting of animal manures and leasing of additional lands. Farmers will require clarity on this to ensure appropriate planning can take place with as much flexibility as possible provided, balanced against the need for regulations to reflect current science. Efforts to reduce the level of crude protein in concentrate feeds will help to control the number changing in the future and an industry wide/whole of government approach is important in this context. In order to support long term planning by farmers, any future review should be well communicated and planned for over several years in advance.

- **Slurry storage requirements including soiled water:**

Farmers have made considerable investments in slurry storage infrastructure and upgrading of farmyards over recent years. It is noted that the storage periods in Schedule 3 of the GAP regulations will be examined by the Nitrates Expert Group as part of the review. The storage capacity required is calculated at between 16-22 weeks, depending on the zone a farm is located in. We are seeking that DAFM will work positively with farmers to support and encourage farmers to have a 20% buffer to future proof their storage capacity in view of changing rainfall patterns and climate change. It is suggested that DAFM should consider providing additional grant aid under TAMS, outside the normal investment ceiling to enable further investment by farmers in slurry storage. It is suggested that there would be considerable benefit in considering new approaches to the management of soiled water and of clean water. Better education and training around this area is needed.

As stated, the sector is working with Teagasc to improve communication and advice on slurry and soiled water management which will be communicated to milk suppliers by their co-ops. In the medium-to-longer term, the development of anaerobic digestion under Project Clover will be beneficial from an economic, social and environmental perspective. Additionally, new technologies should be researched and examined including innovative slurry treatment systems and digestate management technology and use of slurry additives.

- **Drinking water source protection**

The protection of drinking water sources and the zone of contribution of a drinking source is an important element of the GAP regulations. We acknowledge the work undertaken by the National Federation of Group Water Schemes (NFGWS) in this area. The NFGWS has produced a framework document and handbook identifying source protection mitigation measures. A key principle relates to the right measure in the right place, which is aligned to the approach of the ASSAP programme. It should also be noted also that dairy farmers with private wells are required to test their water for the presence of *E. Coli* and *Enterococci* bacteria every three years on a rolling basis as part of the Bord Bia SDAS farm sustainability and quality assurance programme.

Potential additional requirements

- **Liming**

From 1st January 2021, farmers with a stocking rate of 170kg N/ha or above, prior to the export of livestock manure are required to prepare a liming programme. The use of lime and the control of soil pH is essential so as to optimise soil fertility and maximise the nutrient response to applied fertilisers. The bottom line is that lime is the cheapest and most effective fertiliser available to farmers. As a soil conditioner, lime promotes soil micro-organisms and encourages earthworm activity that breaks down plant and animal residues to release plant nutrients, especially nitrogen. Lime improves the availability of phosphorus and aids its release from organic matter. Despite the benefits of lime (€7 return on each €1 invested), lime application nationally is below levels achieved in the 1970's/80's. The sector is fully supportive of the development of a national liming programme. The dairy co-op sector participates in the promotion of lime through individual soil fertility programmes/switch communications and are proactively looking to develop local partnerships with lime suppliers/quarries in their co-op regions.

- **Soils**

A review of soil sample results over 2017 and 2018 analysed by Teagasc indicates that soil fertility levels on Irish farms may be turning a corner with some positive signs of overall improvement. However, more improvement will be needed as identified in the consultation document only 18% of farms achieved levels of soil fertility at the agronomic optimum in 2018. In broad terms, there are 5 key steps needed to maintain optimum soil fertility:

- Regular soil samples taken for the whole farm with many dairy co-ops directly involved in soil sampling and analysis through their own analytical labs, providing a key service at affordable levels for their members.
- Lime application (as discussed above);
- Target optimum soil P and K (Index 3) fertility levels in all fields
- Optimum use of slurry, applied early in the Spring period;
- Ensure a balanced nutrient supply.

The dairy co-op processing sector is directly involved in a range of programmes and initiatives to support soil fertility improvement including through co-op joint programmes with Teagasc, individual co-op soil fertility programmes including subsidised soil testing costs, the ASSAP programme and the Signpost Farm initiative.

A key measure under the Ag Climatise Strategy is the promotion and use of protected nitrogen products. The use of protected urea will have significant environmental co-benefits. It is vital that the ongoing research trials are completed as a matter of urgency to enable greater use of protected urea and urease inhibitors.

- **Grazing intensity/zero grazing**

The review of grazing intensity to whole farm stocking rate must bear in mind that the majority of Irish dairy farms are fragmented in nature. We consider that a whole farm approach to stocking rate is a key fundamental point. A restriction on the grazing platform stocking rate would have a detrimental impact for many dairy farmers and would be a major threat to the viability of these farms. Figures from the Central Statistics Office show the average number of separate land parcels per farm in Ireland has increased from 3.1 in 2000 to 3.8 in 2010. In 2010, 80,000 farms (well over half the total) had three or more separate land parcels. Fragmentation adds to farm costs and reduces operational efficiency: extra labour, travel time, stock movement and inspection, extra machinery and facilities and crossing roadways.

Ireland's competitive dairy advantage lies in our capacity to turn low-cost grazed grass into milk. The consultation document identifies zero grazing as a practice being adopted more and more at farm level. Zero grazing has become a useful grassland management tool during the shoulders of the year for many farms, particularly on land susceptible to poaching. The use of zero grazing at the margins of the year can minimise costs at farm level, reducing reliance on silage and concentrate feeds. We support the development of guidelines that will support best practice and nutrient management for both grazing intensity and zero grazing.

The Irish dairy industry in partnership with Bord Bia has developed a new grass fed standard for dairy production, in response to market demands. The new grass fed standard will verify and leverage our natural, grass based dairy farming system. For a processor to use a Bord Bia verified grass-fed claim on a product, the milk used must average 95% grass-fed on a fresh weight basis. Additionally, the minimum acceptable grass-fed figure for an individual herd to qualify as grass-fed is 90% on a fresh weight basis. Additionally, cows must be at pasture for a minimum of the national average less 80 days (180 days minimum).

- **Exports of livestock manure**

The consultation paper points out that 4,500 farms export livestock manure, adding that the practice of exporting slurry needs a full assessment. We acknowledge that some of the additional measures introduced in SI 40 of 2020 will apply to farms exporting slurry. Slurry is a valuable source of nutrients. The ability to export slurry should be maintained and initiatives to better integrate farming sectors such as tillage and dairy farming should be examined and promoted strongly by all stakeholders as a sustainability measure. The export of slurry cannot be a paper exercise and there cannot be any room for practices that are contrary to environmental best practises.

- **Larger herds**

In 2019, the average sized dairy herd in Ireland was 80.7 cows compared to 205 cows in the UK and 435 cows in New Zealand. By any objective comparison, the average sized herd in Ireland cannot be described as large, compared to other countries and regions. The backbone of the Irish dairy industry is the family farm structure and we wish to see the family farm protected and supported into the future. The family farm structure underpins the co-op model and ethos which prevails in the Irish dairy sector. The expansion of the dairy herd has resulted in larger herds but the vast majority of herds across co-op regions are between 80 and 120 cows. The availability of land, labour and cost of further expansion will be limiting factors, and any future expansion will be more organic/slower than the initial expansion experienced after the abolition of milk quotas. The approach should be based on targeted knowledge transfer and advisory supports for herds identified as potentially adding pressure in a catchment. It is suggested that a targeted advisory approach through the ASSAP programme for farms located in free draining Critical Source Areas where there is N or P excess should be examined.

- **Interim Review of the Action Programme**

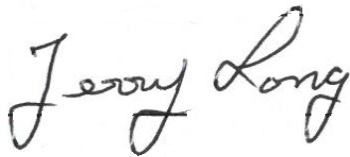
It is noted that the next NAP should be approved for a 4-year period. It is suggested that there should not be excessive change during the next NAP period as measures require time to be implemented and their effectiveness assessed. It is acknowledged that the Government has the flexibility to carry out an interim review, where considered necessary in order to support the continuation of the derogation.

- **Compliance with Birds & Habitats Directive**

Farmers are open and willing to enhance biodiversity measures on their farms. Farmers are implementing better management of hedgerows and planting native trees on their land by way of example. These measures have been supported by co-op schemes and supports. The EU Biodiversity Strategy is a core part of the EU Green Deal and will be an important element of the new CAP. As such, biodiversity will be a central component of the Signpost Farm Initiative with targets to increase the quality and quantity of high value biodiversity on farms, with the expectation and objective of a rapid scale up and rollout across the entire agri sector.

Thank you for the opportunity to make a submission to this important public consultation. We look forward to engaging constructively and positively on this important issue for the dairy sector and the wider rural economy.

Yours sincerely,



Jerry Long
President