

Ireland's Draft Nitrates Action Programme 2nd Stage Consultation:

Proposed Measures:	ICOS Response:
Chemical Fertiliser Register	<p>We request that DAFM fully and appropriately consults with ICOS and ICOS members on the development of the register to minimise bureaucracy on co-ops and farmer members and to ensure the system is as streamlined as possible for both the farmer and co-op. To date, the DAFM has not formally met with ICOS on this matter which is disappointing considering legislation is in the process of development according to the draft document. All sellers of fertilisers must be required to maintain the proposed register in an equitable way. While the proposed register will require co-ops to record chemical fertiliser sales against individual farmer's herd numbers; ICOS is clear that co-op's will not play any regulatory or compliance role related to the register.</p> <p>ICOS has initiated the development of a specific training programme for co-op personnel involved in the purchasing and selling of fertiliser for our member co-operatives. We have completed a training needs analysis including preparation for the introduction of the new register and training of staff and in conjunction with Teagasc intend to finalise and launch the programme in Q3/Q4 2021.</p>
Improving Compliance	<p>ICOS supports full compliance with the GAP regulations and accepts greater levels of enforcement of the current regulations are needed to protect the sustainable image of Irish dairy farming. The DAFM equally needs to recognise that these regulations have been reviewed significantly in recent years and that the GAP regulations have been widened in scope to address ammonia, climate and biodiversity challenges.</p> <p>ICOS believes that grant aid should be provided to farmers judged to be currently not in compliance with the regulations. DAFM should examine the possibility of national exchequer funding as TAMS grant aid cannot be used for this purpose. However, recognising the challenges in this area, farmers not currently compliant should be required to future proof their farms by</p>

	<p>expanding their slurry storage capacity by 20% beyond the regulations as a special condition to avail of grant aid.</p>
<p>ASSAP</p>	<p>We support the review of the ASSAP programme and the commitment in the programme for government to expand the ASSAP programme. The ASSAP programme has demonstrated a genuine commitment and willingness by farmers to improve and protect water quality. The second interim report into the ASSAP programme confirms that 1,810 farm assessments were carried out under the programme up until December 2020 with 96% of farmers engaging in the programme and 92% agreeing to take appropriate actions to remedy risks to water quality. Of significance, the Water Quality 2020 Report 'An Indicators Report' published in July 2021 reported encouraging signs in the Priority Areas for Action where the ASSAP programme is active with a net improvement in 57 water bodies. The DAFM should recognise and reward farmers that are participating in the ASSAP programme by providing them priority access to GLAS, TAMS and CAP Eco Schemes under the new CAP.</p>
<p>Requirement that all slurry must be applied by 30th September 2022 for Zones A, B and C and 15th September 2023 and subsequent years for Zones A, B and C</p>	<p>We are opposed to the proposed measure as currently drafted. The requirement to have all slurry spread by mid-September and the effective extension of the closed period is not based on Teagasc modelling reported in July 2021. We understand the rationale underpinning the proposed measure and the need to spread slurry from the previous winter, as early as possible to maximise nutrient uptake and grass growth. Slurry is a valuable fertiliser and must be treated accordingly; through careful application and management of slurry or organic fertilisers, farmers can reduce their fertiliser bills on the farm. This will increase farm profit while helping to protect our air, atmosphere and water quality. In this context, ICOS members will be proactive in encouraging the earlier application of slurry in the season.</p> <p>As an alternative, ICOS is proposing that there would be a requirement to spread at least 80% of slurry by 15th September with farmers permitted to spread any remaining slurry until 15th October. This will equate to a significantly reduced volume of slurry, applied when average grass growth rates are on average between 30-50 kg DM/day. This proposal will prevent even greater pressure on storage capacity when the closed period ends.</p>

<p>Requirement from 1st January 2023 that farmers stocked >170kg N/ha must demonstrate clear separation of slurry and clean water management in the farmyard</p>	<p>The majority of farmers actively manage the separation of clean water in their farmyard. Under current cross compliance rules, SMR 1, farmers are required to divert all clean water to a clean water outfall and prevent clean water from becoming soiled.</p>
<p>From 1st January 2022, all newly constructed external slurry stores must be covered. All existing external slurry stores should be covered as soon as practically possible, but no later than 31st December 2027</p>	<p>The covering of existing external stores may be costly and difficult structurally. Due regard must be taken of health and safety risks. The provision of grant aid for the roofing of existing and new external stores and lagoons must be provided under TAMS and repeat our position that there should be a separate ceiling under TAMS for slurry storage and soiled water including for the covering of external stores. We acknowledge that DAFM has sought to clarify that external slatted areas are not included under this provision.</p>
<p>Soiled water must be collected and kept separate to slurry on all holdings</p>	<p>ICOS maintains that if a farm has ample storage for slurry and soiled water collected on a farm, there should not be a requirement to keep slurry separate from soiled water. Appropriate grant aid and lead in times must be provided to enable farmers invest in new soiled water storage, where required.</p>
<p>From 1 January 2022 – to reduce the impact of nutrient losses in the riskiest period, the spreading of soiled water will be prohibited between 15th November and 15th January</p>	<p>We are opposed to the ban on spreading soiled water between 15th November and 15th January. The proposal is not based on Teagasc modelling published in July 2021. The impact of spreading slurry in the month of December was examined but not the impact of soiled water. ICOS questions the rationale underpinning the proposal, which appears to be an indirect measure to target slurry storage capacity concerns and compliance with the current regulations. The nutrient content of soiled water is far less damaging to water quality than slurry, especially if not agitated and should be spread on land when ground and weather conditions are suitable. In addition, the DAFM should provide for alternatives such as sprinkler systems, which should not be subject any closed period, provided such systems are used in line with good agricultural practices. At the very minimum, the ban on spreading soiled water should be reduced to 4 weeks from 15th December to 15th January with an exemption for active milk producers during the winter.</p>

<p>All holdings producing soiled water must have a minimum of 4 weeks' storage in place by 31st December 2024</p>	<p>There should be no need to build unnecessary capacity for soiled water. The main focus must be on slurry storage capacity and ensuring all farmers have sufficient slurry storage in place. Ensuring all farmers reach compliance levels for slurry storage must be the number one priority for the Department of Agriculture when it comes to water quality.</p>
<p>Livestock Excretion Rates</p>	<p>It is likely that this measure will be implemented as its being requested by the EU Commission. ICOS recommends that the 89 kg/N figure is maintained for at least two years given that the change was only introduced in 2020. For some farmers within the higher band, it will mean considerable change with no lead in time, which is unfair. A longer implementation period will allow for more analysis into the full implications of the proposed bands on future breeding decisions, sustainability outcomes and to manage adjustments at individual farm level to account for changes to stocking rates.</p>
<p>Dairy Industry N Reduction Initiative</p>	<p>ICOS supports this measure and suggests the proposed measure be integrated into current co-op communication and advisory channels. We strongly assert that co-ops do not and should not be asked to take on any compliance role related to the GAP regulations.</p> <p>The dairy co-op sector has supported several initiatives to-date beneficial to environmental improvement and production efficiency at farm level including:</p> <ul style="list-style-type: none"> - Co-op Joint Programmes with Teagasc - SDAS - The Bord Bia Grass Fed Standard - ASSAP. - Teagasc Signpost Farm Project - MilkFlex/DairyFlex Funding Programmes - Individual co-op programmes e.g., soil sampling, sustainability training programmes, milk pricing incentives to support milk recording etc - Communications to members on sustainability via monthly newsletters, text messages, social media including targeted messages such as the switch campaign

<p>Chemical Fertiliser Controls</p>	<p>ICOS is opposed to the extension of the closed period for the application of chemical fertiliser. We alternatively suggest that the current period be maintained with the addition of precision management advice/weather advice around the timing of the first chemical N application in the Spring. We accept the review of nitrogen allowances including a 10% reduction nationally. We caution against the introduction of the 15% reduction for certain areas until the new allowances are introduced for a period of time to allow for the greater adoption of technologies such as clover.</p>
<p>Sewage/Industrial Sludges</p>	<p>The application of sewage slurry is a major non-compliance under SDAS. Dairy Processors are committed to working with appropriate regulatory bodies in relation to industrial sludges.</p>
<p>P Build-Up</p>	<p>ICOS welcomes the proposal which will allow farmers to achieve optimum soil fertility in line with good farm sustainability practices.</p>
<p>Green Cover on Tillage Ground</p>	<p>We acknowledge this proposal and recommend the inclusion of some flexibilities where needed.</p>
<p>Organic Matter Determination</p>	<p>We accept this proposal.</p>
<p>Soil Tests</p>	<p>We accept this proposal noting that soil testing must be as accurate and reliable as possible.</p>
<p>Grazing Land Management</p>	<p>It is important that genuine situations in relation to the 30km limit are assessed and treated accordingly. In general, we question the use of arbitrary limits in policy making.</p>
<p>Review of Technical Tables</p>	<p>This is a critical issue. Additional supports for slurry storage are required under the new CAP including. ICOS is recommending a comprehensive support package should be brought forward supported by EU and nation exchequer funding. This should include:</p>

	<ul style="list-style-type: none"> - 60% grant aid for all farmers investing in slurry storage/soiled water. - Grant aid permitted for farmers currently non-compliant using national funding, subject to 20% safety net. - Slurry storage and soiled water investments should be allocated outside the €80,000 investment ceiling. - The introduction of a new tax relief measure, similar to the benefits provided by Stock Relief for slurry storage/soiled water investments. - Plus, accelerated capital allowances through taxation. <p>If there is any change following the review, there must be appropriate lead-in times of a minimum 3-5 years required to allow for new investments in capacity, given the storage of construction workers and building costs/material inflation experienced across the entire economy. The DAFM should review on an ongoing basis the costings under TAMS, taking building materials/costs inflation into account.</p>
<p>Air Quality / LESS introduced for all farmers above 100 kg from 2023</p>	<p>The key issue here is the availability of grant aid once a measure becomes mandatory and support needed for farm contractors. These are the main issues the Department must address before the measure is made mandatory. The greater use of LESS equipment is required under Ag Climatise and the Climate Action Plan. 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.</p> <p>Equally, 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 an even 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.</p> <p>Furthermore, a longer lead in period is justified considering the widely reported backlogs/supply challenges related to LESS equipment.</p>

	<p>Finally, we believe that grant aid for LESS equipment should be continued/reinstated for derogation farmers, given that the sustainability challenges related to water, climate, biodiversity and air are key priorities for policy makers at EU and national level, these same policy makers must recognise that a common-sense approach is needed and ongoing support is required to enable farmers to transition in a just and fair manner.</p>
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