

General News

National Fodder & Food Security Committee (NFSCC) Meeting

A meeting of the NFSCC was held at the end of March to discuss the difficulties facing farmers due to current weather conditions. IGFA had already been in touch with DAFM regarding silage availability and the stress on farmers as a result of the prolonged wet weather. We asked them specifically to consider the 2 points below to ease the pressure;

- As transport will be another limiting factor that will add to the pressure on farmers, IGFA requests that transport of animal feed and inputs for grain and forage production (e.g. fertiliser/ seed) be included in exemptions/derogation in tachograph and driver's hours rules.
- In light of poor grazing conditions and saturated soils it seems unlikely that dairy cows will have 100% of their diet from grazed grass. In order to provide adequate protein to dairy cows, it is likely that concentrate protein levels will exceed 15% after 15th April. The rules say that if higher levels of crude protein are required, this needs to be justified and certified by the appropriate advisor. To reduce the administrative burden on stretched Teagasc and independent advisors and DAFM Nitrates inspectors, IGFA requests that the wording for the maximum crude protein content of 15% in concentrate feed for adult livestock on a fully grazing diet, be amended to feed purchased between 1 May 2024 and 15 October 2024.

IGFA raised these issues at the NFSCC meeting and also highlighted concerns related to straw availability, credit on farms and lead times for feed deliveries. We also highlighted serious concerns with silage availability and the importance of not only surveying farmers on the silage they have, but understanding if those who have surplus available are willing to sell. The NFSCC press release is available [here](#) and presentations [here](#)

Nitrates Derogation 2024 and "opt-in" to feed lower crude protein

The Minister for Agriculture, Food and the Marine, Charlie McConalogue, T.D, announced on 12 March 2024, that the "2024 Nitrates Derogation application system is now available on-line". As part of other adjustments, an "opt-in" measure to feed a lower level of crude protein has been introduced and was recommended by the Ag Water Quality Working Group. IGFA was not invited to be a member of this group despite the fact that it makes recommendations on a number of feed related issues.

We raised this directly with DAFM expressing serious concerns that IGFA members, who have animal feed and nutrition expertise and understand the situation on the ground, were not properly consulted. IGFA highlighted that farmers may not be well enough informed of the consequences to milk volume and animal health if the dietary crude protein in the total diet falls below optimum levels. We also raised concerns about introducing a more complicated system and the undue stress this could place on farmers if weather conditions are not favourable. IGFA therefore asked DAFM to postpone these changes for a year so that they can be more fully analysed and to give time to the feed industry and farmers to prepare for, adjust to and better understand what is required.

DAFM's response was to reiterate that this is an 'opt in' measure and not a compulsory one and farmers are being advised that any decision should be appropriately informed by their Agri-adviser. Further details are available on the [Nitrates pages](#) of the DAFM website including a [FAQs document](#).

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RASFF MARCH 2024

Total Food & Feed	508
Total Feed	29
Feed Materials	21
Compound Feed	3
Pet Food	3
Feed Premixture	1
Feed Additives	-
Animal by products	-
Fats and Oils	1

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Crude Protein in Concentrate During the Summer Period 2024

IGFA had confirmed the below information with DAFM.

Ques – What will be the level of Crude Protein (CP) allowed in concentrate feeds for grazing livestock at grass in 2024? **Ans**– Bovine livestock greater than two years old, including dairy cows, fed on a 100% grass forage diet during the main grazing season will be required to comply with a maximum of 15% CP (on a fresh weight basis) between 15th April to 30th September in 2024. Note: If higher levels of crude protein are required, this needs to be justified and certified by the appropriate advisor.

Ques – Who qualifies as an appropriate advisor for the purpose of this certification? **Ans**– An appropriate advisor is the compounder, supplier of feed, nutritionist or FAS approved agricultural advisor.

Ques – Is this requirement only for dairy cows on the holding? **Ans**– No, this measure is focused on dairy cows and cattle over two years and does not apply to livestock under two years.

As mentioned above in the NFSCC paragraph, weather conditions are having an impact on how soon animals can get out on grass. IGFA has therefore requested that the wording for the maximum crude protein content of 15% in concentrate feed for adult livestock on a fully grazing diet, be amended to feed purchased between 1 May 2024 and 15 October 2024.

It is important to note that DAFM has informed IGFA that there is a regulatory change proposed for 2025 to reduce the maximum limit to 14% and extend to all farmers.

National Feed Database

At the IGFA feed committee meeting on 5 March, DAFM told members that they were in the early stages of considering the development of a feed database that would help provide farmers with nutrient balance information for their farms. They said this would help reduce losses of nitrogen to water and reward best practice. The feed database would be modelled on the lessons learned from the recently established fertiliser database.

IGFA members questioned the added value of developing a feed database and were concerned that the database could not accurately record all trade in feed. They also highlighted a number of practical issues including how to record trade along the border.

IGFA has been invited to put forward nominees for a DAFM 'scoping group' to look in more depth at developing the database and the practical challenges that might arise.

Commission to impose “special” tariffs on Grain and Oilseeds Imports from Russia and Belarus

Commission President von der Leyen has announced a new Commission proposal to increase the tariffs on imports of Commission President von der Leyen has announced a new Commission proposal to **increase the tariffs on imports of cereals and oilseeds into the EU from Russia and Belarus. She said the proposal would** 'prevent Russian grain from destabilising the EU market in these products', adding that it will 'stop Russia from using the revenues from the export of these goods to the EU and ensure that illegal Russian exports of stolen Ukrainian grain do not enter the EU market.'

The tariffs will apply to cereals, oilseeds, and derived products ('grain products') from Russia and Belarus, including wheat, maize, linseed and linseed meal, rapeseeds and rapeseed meal and sunflower seed and sunflower meal. The tariffs are designed to be high enough to discourage current imports and the proposal would put a €95/tonne tariff on most exports of cereals from Russia and Belarus, with a 50% *ad valorem* duty for oilseeds and derived products.

Agriculture Ministers did not address this issue when they met on 26 March, but it is scheduled to be discussed by member state representatives at an upcoming meeting on April 5th. It is unclear as yet how member states will view the proposal and how much time they will need to discuss it. It is also therefore unclear when the proposal might be agreed and when it will apply from. Further details from the commission are [here](#) and a [Q&A](#) document.

Environment News

Agriculture Ministers debate EU Deforestation Regulation (EUDR)

The EUDR entered into force in June 2023 with the aim of ensuring that EU imports of a range of products, including soy, do not contribute to EU and global deforestation and forest degradation. Amongst other things, the regulation requires traceability to the plot of land of all commodities, operators to collect the geolocation coordinates of all land where the commodities have been produced and segregation of commodities from those of non-compliant origins along the supply chain. Obligations for operators are due to be in place by the end of December 2024.

EU Farm Ministers met at the end of March and the Austrians tabled a paper outlining the implementation challenges with the EUDR and calling for the implementation period to be significantly extended. They also highlight the ‘unjustified administrative burden’ created by the EUDR. Ireland supported the Austrian position but did not specifically call for the extension of the implementation period.

Industry has also written to the commission to ‘express serious concerns regarding the pace of preparation of EUDR-related legislative acts, the mandatory systems (i.e. Information System), and the guidance and clarifications required for implementation by operators and traders and enforcement by competent authorities.’ They add that the authorities have ‘many misconceptions as to the functioning of our complex chains’ and warn that ‘unless timely and adequate responses are provided, we cannot exclude serious disruptions in all commodity supply chains, with potential unintended negative effects on the supply of essential goods (including feed) for the European market’.

European Parliament Adopts Position on Food Waste Targets

On 13 March the European Parliament adopted its position on the proposed revision of the Waste Framework Directive which includes mandatory food waste reduction targets. The position proposes higher binding waste reduction targets to be met at the national level by 31 December 2030 – at least 20% in food processing and manufacturing (instead of 10% proposed by the Commission) and 40% per capita in retail, restaurants, food services, and households (instead of 30% proposed by the Commission). As the EU Council is still not near formalising a position, the European Parliament announced the file will need to be followed by the new Parliament after the 6-9 June European elections. On 18-19 June there will be an International Food Waste Conference in Veghel (The Netherlands) and animal feed is likely to be on the programme.

Industrial Emissions Directive (IED)

On 12 March, the European Parliament officially approved the compromise achieved in November regarding the proposal for a revision of the Industrial Emissions Directive (IED). The updated IED excludes cattle farms for now but will force large pig and poultry farms to comply with rules for clean air and water. It also includes new provisions applicable to industrial establishments, including feed mills which will reduce the administrative burden. The next stage will be to get official approval at Council. Publication is likely before the summer break and it should enter into application in spring 2026. Full details of the compromise agreement can be read [here](#).

Renewable Energy Directive (RED)

The original RED (2009/28/EC) established a policy for the production and promotion of energy from renewable sources in the EU. Now REDII (recast Renewable Energy Directive (EU) 2018/2001) requires the EU to fulfil at least 32% of its total energy needs with renewable energy by 2030 and includes provisions to promote the use of biofuels and biogases produced from specific feedstocks listed in Annex IX. The latest version of the delegated act of RED II of Annex IX doesn't feature feed and food materials.

Technical News

EFSA Report Shows Low Levels of Residues of Veterinary Drugs in Animal Products

On 6 March EFSA published its report on residues of veterinary drugs and other substances in animals and animal-derived food in 2022. The report looks at hormones, antibacterials, environmental contaminants, prohibited substances, and other veterinary drugs in animal products reported by EU member states, Iceland and Norway. In 2022, the percentage of non-compliant samples was 0.18%. This is a welcome result as non-compliance ranged from 0.17% to 0.37% for the previous 13 years. Read the full report [here](#).

Antimicrobial Resistance (AMR)

On 28 February EFSA and ECDC (European Centre for Disease Prevention and Control) released a joint report on antimicrobial resistance in zoonotic and indicator bacteria from humans, animals, and food in 2021–2022. The report concluded that the combined resistance to critically important antimicrobials for human medicine remains very low, except in some types of Salmonella and Campylobacter coli in some countries. This, alongside a decrease in the prevalence of E. coli isolates that produce ESBL or AmpC, demonstrates progress in reducing antimicrobial resistance (AMR) in E. coli from food-producing animals across several EU member states. However, resistance of Salmonella and Campylobacter bacteria to commonly used antimicrobials continue to be observed frequently in humans and animals. Read the full report [here](#).

PFAS – Forever Chemicals

Per- and polyfluoroalkyl substances (PFAS) are a large class of thousands of man-made chemicals used throughout society. They have been used in industrial and consumer products since the 1950s due to their physical and chemical properties. These properties include water and oil resistance, chemical and heat stability, friction reduction and surfactant properties. They can be found in everyday products such as textiles, food packaging and electronics. They can have harmful effects on human and animal health and stay in the environment and in our bodies for long periods where they can increase in concentration. This is why they are sometimes referred to as “forever chemicals”.

Regulation (EU) 2022/1431 calls for monitoring of a wide range of foodstuffs between 2022-25 for PFAS. It says the screening is to be performed in collaboration between competent authorities and food business operators. It also states food of animal origin is an important contributor to the human exposure to PFASs. The transfer may also occur from soil ingested by foraging farm animals, from drinking water for animals or animal feed. It adds that “for the follow-up investigations aiming at determining the causes of contamination, where the maximum levels of PFASs in food (EU) 2022/2388 of animal origin is exceeded, it is important that laboratories are able to also control feed, animal drinking water and the soil on which animals live”

As some IGFA members have had queries from their customers, IGFA contacted DAFM to get a status update. DAFM confirmed that there is currently no regulatory obligation for feed businesses to test feed for PFAS, the recommendation is for Member States to do tests if they have the capability. They advised their lab is currently developing a method for testing PFAS in feed. The monitoring will include the following PFASs: Perfluorooctane sulfonic acid (PFOS), Perfluorooctanoic acid (PFOA), Perfluorononanoic acid (PFNA), and Perfluorohexane sulfonic acid (PFHxS). The types of feeds to be monitored will include: fish, other aquatic animals and products derived thereof, which are used as feed; seaweed meal and feed materials derived from seaweed; feed of mineral origin; forage, silage, hay and fresh grass; compound feed containing fish, other aquatic animals and products derived thereof and/or seaweed meals and feed materials derived from seaweed.

EU Catalogue of Feed Materials

The procedure for the 5th upgrade of the EU Catalogue of feed materials was launched in January 2024. IGFA invited members to submit their proposals for new catalogue entries or modification of existing entries before 19 March. Only feed materials already on the market (ie on the feed register) may be submitted to the Catalogue. The proposals received were sent to FEFAC and will be assessed during Q2 of 2024. A final list will be submitted to the Commission in October.

Feed Additive Regulation

Regulation (EC) No 1831/2003 lays down the procedure for authorising the placing on the market and use of feed additives and the rules for labelling feed additives and premixtures. Over the last few years (started in 2017), the Commission has been carrying out an evaluation of this regulation. The aim of this was to assess if the legislation has performed as expected, whether it still meets the needs of citizens, businesses and public authorities and also to identify possible burdens it may have created as well as any inconsistencies or gaps in the legislative framework.

The Commission has now published the outcome of this assessment which is a key milestone on the road to a revision of the feed additives legislation. Overall, it was noted the regulation has performed fairly well but 3 areas for improvement were identified. These were measures to encourage innovation in feed additives, in particular, those that can improve the sustainability of livestock farming, reduction of administrative and regulatory burden generated by the authorisation process and steps to further enhance animal welfare. For more detail see the executive summary of the evaluation [here](#). The next stages will be the finalisation of the Impact Assessment and the drafting of the legislative proposal, due in 2025.

Other news

UFAS Update Seminar

AIC is running a seminar in Athlone on 25 April that will give details on the updated FEMAS, TASCC, and UFAS standards. Register your interest [here](#).