

Public Consultation on

Proposed Additional Measures for the Fifth Nitrates Action Programme

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IGFA Response

Introduction

IGFA welcomes the opportunity to respond to the consultation on the Proposed Additional Measures for the Fifth Nitrates Action Programme. We note the various measures proposed in the consultation and have commented below on those most relevant to the Irish feed sector.

Proposed Measures to be included as amendments to the Good Agricultural Practice Regulations

The consultation proposes

2.1.6. Managing Crude Protein in concentrates fed to dairy cows

Teagasc research shows that the dairy cows' nitrogen excretion rate can be reduced through a reduction in the level of crude protein fed in concentrate feed. A voluntarily reduction of the level of crude protein beyond legal obligation should be recognised for dairy farmers that inform the DAFM that they are opting to feed an annual average crude protein in concentrate to dairy cows that is lower than the national average crude protein content used to calculate standard excretion rates. An amendment to Table 6 of the GAP Regulations (S.I. 113 of 2022, as amended) will recognise such herd's lower nutrient excretion rates. These changes will be implemented with immediate effect.

IGFA Response

Evidence of ongoing reduction in crude protein levels.

Recent government surveys on protein levels in animal feed have shown that there has been a positive downward trend in crude protein levels over the past number of years. IGFA welcomes this and our members have consistently advised farmers to reduce protein levels where it is possible and appropriate to do so.

The link between lower crude protein and milk yields must be understood

The priority for IGFA members is to ensure that 1. the health, welfare and productivity of the animal is maintained and 2. there is not surplus protein in animal diets.

We believe that all decisions regarding diet formulation and dairy cow nutrition must be based on fact and science and take consideration of the entire diet with forage being one of the biggest variables. Many of our IGFA compound

feed members pay an annual fee to participate in weekly grass analysis during the grazing season so that they can advise customers on diet formulation based on relevant grass nutritional values. Trouw Ireland (part of Nutreco) run the Grass Watch programme where monitor farms in the Republic of Ireland submit weekly grass samples and corresponding production data. This programme has been running since 2017 and there is individual data available for each year 2017-2024.

Trouw Nutrition Grass Watch Seasonal Trend in Grass Crude Protein and Energy for 2024 versus the average 2017-2023 (Full data set available from Trouw Nutrition Ireland)



Figure 1 Seasonal trend in grass metabolizable energy



Figure 2 Seasonal trend in grass crude protein

Due to the combination of reduction in grass quality and lower intakes, cows struggled to reach their usual peak yields in early lactation. Consequently, despite monitor farms offering more compound feed (average 1kg), milk production was reduced in terms of milk solids and yield (average 2 liters) compared to previous years. A drop in milk production has a significant effect on farm profitability but also on the environmental impact per kg of milk solids produced.

Figure 1 shows that the actual energy value of grass in 2024 did not differ massively compared to the average trend so why was there a drop in milk yield? IGFA members have teams of nutritionists who believe that some of the

production loss was due to a deficiency of protein in the cow's diet in the main grazing season. Grass crude proteins were significantly lower for most of 2024 compared with 2017-2023, (see Figure 2) on average 3% lower across the season. This is likely a result of restricted nitrogen uptake by grass, due to a range of different factors throughout the year (cooler temperatures, soil moisture deficits, lack of sunshine, etc). Milk ureas in many cases were in the mid to low 20's (mg/dl) – indicating a sufficient supply of rumen degradable protein (RDP), relative to rumen fermentable energy.

To support the 2024 findings in the Grass Watch programme it must be noted that Irish milk processors report that the corresponding Milk Urea Nitrogen figures anecdotally showed that where very low MUN figures appeared on farm, the introduction of higher crude protein concentrates significantly increased milk yield in many cases.

To ensure genuine and long-term results for the environment and the industry, IGFA believes the focus should be on

- 1. Ensuring that data on milk urea provided by a number of processors is analysed before deciding what level of protein an animal requires in its feed.
- 2. Getting real information on the levels of protein in grass so it can be accurately assessed what is necessary in concentrates. IGFA members would like to see the weekly publication of Grass Protein Results from Teagasc under the governance of the Signpost and Grass 10 weekly updates. It should be a national requirement that the level of dietary crude protein in grazed grass is sampled at various locations within the 26 counties.

Communication with farmers

IGFA is concerned that farmers will 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. In cases of reduced grass or high protein forage this needs to be made clear to dairy farmers. It is vital that there is a clear campaign explaining the impact of lowering protein levels, especially when high quality protein grass is available. Building confidence and knowledge amongst the farming community so they can choose, when appropriate, lower protein feeds, will be essential.

The consultation proposes

1.1.7. <u>Concentrate feed during the grazing season</u>

With regard to concentrate feedstuff fed to bovines aged two years and over at grass between 15 April and 30 September, the current maximum crude protein content is 15% on holdings with a previous year's grassland stocking rates of 130 kg N/ha and above. This maximum crude protein content will be reduced to 14% on all holdings from the 1 January 2025. This will reduce the nitrogen content in urine patches when bovines are grazing.

IGFA Response

Concern regarding the impact of low protein levels

The amount of crude protein necessary in concentrate feed between April and September is largely dependent on protein levels in grass over that period. Grass protein levels differ from farm to farm depending on various factors including grass management. As mentioned above, IGFA members are concerned that on farms where grass protein is low, feeding with lower levels of crude protein might adversely impact animal health and productivity.

IGFA members have also noticed that milk urea levels are falling on an increasing number of farms. This indicates that there is not enough protein in the diet and seems to be happening more frequently due to drier weather conditions. This is having an inevitable impact on milk yields and the general productivity of animals. We are concerned that the drive to reduce crude protein levels in concentrate feeds even further, may exacerbate productivity issues and in extreme cases, may require the recommendation of protein supplements.

Concern a legislative requirement to reduce protein levels will be counter productive

Some farmers successfully moved to feeding 15% crude protein from April to September 2024. However, this has not worked for all farmers and IGFA members therefore question whether a broad-brush legal requirement to reduce protein levels further is appropriate. We do not want to reach a tipping point where, because of animal health concerns, the majority cannot reach the legal requirement and feed at a lower level. This would mean constant

requests for letters from feed companies to explain why higher levels are required and a significant increase in the admin burden on mills. It would also defeat the purpose of lowering crude protein levels as the impact on N levels would be minimal.

Need for improved communication on the detail of the Nitrates Regulation

Feed Mills have continued over the years to advise their customers to reduce crude protein levels where possible during the relevant periods and have kept farmers informed about the necessity to follow the nitrates rules. They have been in constant contact with their customers and have seen first-hand the confusion amongst farmers, and indeed some advisors, on what was required. IGFA believes that there needs to be more effective and widespread interaction with farmers and advisers on the conditions that relate to animal feeding under the Nitrates rules. This is critical to avoid confusion amongst farmers, extra administrative burden for feed manufacturers and negative impacts on farming businesses. Below are areas where communication needs to be improved as a matter of priority.

- There are limited numbers of dairy farms stocked at or below 130kg nitrogen per hectare so the vast majority of dairy producers now fall within the scope of the regulation. Awareness of this needs to be raised within the farming community.
- To avoid any risk to the animal, farmers need to be made more aware that if higher levels of crude protein are required for animal health reasons, there is provision to allow feeding at crude protein levels above the maximum percentage proposed. It is required however that this be justified and certified by the 'appropriate advisor'. Although DAFM has clarified with IGFA in the past that an ''appropriate advisor' is a compounder, supplier of feed, nutritionist or agricultural advisor, this is not widely understood by others.
- The crude protein maximum applies to dairy cows and cattle over two years and does not apply to livestock under two years. In 2023 and 2024 many IGFA members were asked to provide supporting documentation for the use of higher protein feeds. However, many of these requests were made for animals under 24 months of age. It is therefore clear that farmers and advisers are not getting clear messages that the maximum crude protein only applies to animals over two years.

Flexibility on grazing season dates

Those farming in nitrate derogation areas were required in 2021 to feed crude protein at a maximum of 15% from April 1st to September 15th. The start of the derogation period coincided with changeable weather and variable grazing conditions. In some areas grass was not available in sufficient quantities to supply protein requirements. The potential consequences of lowering protein levels in feed were therefore a concern for IGFA members and our farming customers. A decision was made to change the period where maximum levels of crude protein are required from April 15th to September 30th.

In 2024 we faced poor grazing conditions and saturated soils throughout April and IGFA requested that the maximum crude protein content of 15% in concentrate feed for adult livestock on a fully grazing diet, be amended to feed purchased between May 1st 2024 and October 15th 2024. IGFA highlighted that in order to provide adequate protein to dairy cows, concentrate protein levels needed to be above the 15% after 15th April. However, DAFM did not change the dates. This created extra administrative burden on already stretched advisors and feed manufacturers as they were required to justify this decision for farmers.

We are therefore requesting that DAFM take a common-sense approach when considering the dates of the 'grazing season' so that the admin burden can be minimised for feed producers and farmers and so that the rules actually deliver the desired results. With the increasingly unpredictable climate in Ireland, we should not force farmers to farm by the calendar and need to design a system that allows flexibility.

The consultation proposes

2.2.4 Nutrient Surpluses and Animal Feed sales/ import database

To achieve water quality improvements and stabilisation, targeted action is required. In cases this requires a reduction in the purchased nitrogen and/or phosphorus surplus per hectare. The Better Farming for Water Campaign has identified this as one of its key actions.

DAFM, in conjunction with stakeholders, will develop a measure for the Sixth NAP that will allow farmers to obtain their farm nutrient surplus value. This process will be informed by industry-led pilot catchment projects and the Farming for Water European Innovation Partnership.

Furthermore, to enable efficient calculation of nutrient surpluses, an animal feed sales/import database would complement the National Fertiliser Database. This may require primary legislation to be put in place. While this would take time to develop, DAFM will progress the process of scoping this measure in advance of the Sixth NAP. In addition to the National Fertiliser Database, a Feed Sales Database when combined with farm output data would allow:

• Base-level information for a farmer to benchmark themselves and improve efficiency and productivity;

• Possible industry incentives to reduce nutrient surpluses; and Policy development regarding nutrient use and management at catchment scale.

IGFA Position

Lessons learned from the Fertiliser Database

Lessons learned from experience with the Fertiliser database indicate that despite the time, effort and expense involved in setting up the tool, huge problems still exist. The fertiliser database has been undermined by the massive cross border trade in fertiliser and the inability to capture this information. IGFA believes that we need to learn from this experience and that DAFM should seriously consider whether this path, which is littered with obstacles, is the right way forward. Given that the fertilizer database is not covering 100% of the fertilizer imported into the country and sold on to farm, one would expect that a feed database is even less able to capture a realistic picture as a result of the complexities in the feed chain.

Quality of data

A database that does not accurately record the necessary data or is incomplete, is not an adequate tool to help farmers efficiently calculate nutrient surplus values. Complexities in the feed chain, not to mention an inability to record trade along the border, will make it impossible to detail all trade in feed. Requiring farmers to determine their nutrient surpluses based on inaccurate data will not achieve the desired water quality goals.

The scoping group

It is vital that the scoping group has proper representation from the Feed Industry. IGFA sent DAFM the names of those members that we would like to represent us on this group on 9 April 2024. Representation from the feed industry should reflect the different types of feed business and should have a good geographical spread.

We were informed that the scoping group would look at the advantages and disadvantages of setting up a feed database. We urge the government to do this with an open mind and genuinely assess, in partnership with industry, whether a feed database will truly contribute to improving water quality. Given the problems experienced with the fertilizer database, the complexities with administrating the database and the likely negative impact on business with cross border trade, IGFA members are not convinced that a feed database is an appropriate or effective next step.