

Retaining Ireland's Nitrates Derogation – Common Objectives

A Joint Declaration from Farm
Organisations, Co-operatives and
the Dairy and Meat Processors



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Executive Summary

The nitrates derogation is of huge importance to the Irish agri-food sector and the wider economy. The derogation allows our grassland farmers to maximise the advantages of our grass-based system while somewhat balancing the significant economic disadvantages they encounter compared to their European Union (EU) counterparts. The uncertainty around the future of the nitrates derogation is doing little to improve water quality but is causing havoc for Irish farmers who are in the dark as to what parameters they will be farming within from 2026.

Ireland's water quality currently ranks well in an EU context. An analysis of EU groundwater stations completed for the 2016-2019 period shows that Ireland ranked 4th in the EU with 2.5% of Ireland's stations reading above 40mg nitrate/litre compared to an EU average of circa 19%. It is fully appreciated that continued improvement in water quality is necessary. However, water quality improvement must be science-led with due recognition for the time lag before implemented actions have the desired impact on the ground.

The dairy and meat sectors, including farm organisations, co-operatives and processors are fully committed to working with the Government to formulate a clear plan to enable the EU Commission to extend Ireland's nitrates derogation for at least another 4-year period beyond 2025. This document sets out common objectives that the sector believes will deliver the renewal of the nitrates derogation and beyond while also protecting water quality.

The Irish livestock and dairy sectors are fortunate to have a predominantly grass-based family farming system which must be protected. The sector remains fully committed to water quality as demonstrated by the numerous measures implemented by farmers on their farms over the last number of years.

The recent cabinet memo confirming Government support for the renewal of the nitrates derogation along with the recent "Water and Agriculture, a collaborative approach" plan, which aligns with much of our objectives, is welcomed. It is the view of the sector that the Taoiseach should lead a cabinet sub-committee tasked with working to secure the renewal of the nitrates derogation. In addition, it is vital that a full impact assessment of the economic, social and environmental implications of a potential further reduction in organic nitrogen (N) limits granted under the nitrates derogation is urgently required. The lack of a state-commissioned impact assessment to date is deeply frustrating.

It is the view of the sector that the terms of the last nitrates review were unachievable. There should be no agreement to any further water quality conditionality without prior consultation with the entire sector.

The immediate implementation of a nationwide fully funded water advisory programme should take place to ensure continuous improvement in water quality. Water quality is the responsibility of all farmers, not just those in derogation – accordingly this programme must encompass farmers across all sectors.

State funding is a vital and necessary tool to deliver continued improvement in water quality while also securing the long-term future of the sector. Funding from the EU National Recovery and Resilience Plan (NRRP) and the Infrastructure, Climate and Nature Fund (ICNF) should be mobilised immediately to support on-farm investments aimed at protecting water quality such as nutrient storage, and to also drive the recommendations of the Agricultural Water Quality Working Group (AWQWG).

The investment in on-farm nutrient storage must be prioritised and incentivised. This should include amendments to existing planning legislation to expedite the planning permission process for those seeking to invest in storage. In addition, provision of 70% grant aid via the Targeted Agricultural Modernisation Scheme (TAMS) with a separate ceiling and regularly updated costings is also required.

The loss of the nitrates derogation would have an economic impact on rural Ireland, the scale of which cannot be underestimated. As the representatives of the primary and processing producers of dairy and meat products in Ireland, our organisations have come together to outline what is needed to ensure a nitrates derogation is granted in 2026 and thereafter. The implementation of the common objectives presented will deliver good water quality while also ensuring the present family farm model remains not only viable but sustainable into the next decade and beyond.



Introduction

The nitrates derogation is of huge economic importance to the Irish agrifood sector and the wider national economy. The nitrates derogation allows our grassland farmers to maximise the advantage of the Irish grass-based system while balancing the significant economic disadvantages that Irish farmers encounter compared to their EU counterparts. The current uncertainty around the future of the nitrates derogation is doing little to improve the water quality situation in Ireland, which in comparison to other EU member states, is relatively good.

An analysis of EU groundwater stations completed for the 2016-2019 period shows that Ireland ranked 4th in the EU, with 2.5% of Ireland's stations reading above 40mg nitrate/litre compared to an EU average of circa 19%. It is however playing havoc with the fundamentals of Irish agriculture and could instigate structural, social and economic decline if not appropriately addressed. The industry is deeply concerned about the social impact a further reduction to the nitrates derogation will have on the family farm model, the land market and generational renewal – fundamental to the sustainability of agriculture in Ireland.

Removal of the nitrates derogation would have widespread negative economic consequences to Ireland's rural economy with a potential combined multi-billion-euro annual economic impact. A whole-of-government approach is needed to prevent this from happening, in a comparable manner to the states preparedness during Brexit negotiations. Moreover, and to support this, there is a clear determination by all parties in the agricultural sector to work with government and other stakeholders to address this significant challenge.

Achieving continuous water quality improvement must be led by scientific knowledge, improvement programmes, quality of knowledge transfer and communications to farmers and other

stakeholders, with a recognition and acceptance that there will be a time lag before implemented actions have the desired impact on the ground. Retaining the nitrates derogation is complementary to the ambition of protecting and improving water quality. Farmers availing of a derogation with respect to nitrates abide by a significant number of additional measures compared to those not availing of a derogation. Unless a collective effort is undertaken to an agreed action plan for improved water quality, and thus preserving the nitrates derogation, the capacity of the industry to remain efficient and competitive internationally, will be fatally undermined. Thus, this would be damaging to the Irish economy and ultimately provide the death knell for many Irish family farms.

The dairy and meat sectors, including farm organisations, co-operatives and processors are fully committed to working with government to formulate a clear plan to enable the EU Commission to extend Ireland's nitrates derogation for at least another four-year period beyond 2025, and preferably an indefinite solution reflecting Ireland's unique outdoor grass-based family farm system. The following common objectives are presented as a collective effort with the singular goal of securing EU Commission approval for the continuation of the nitrates derogation to give the sector clarity into the medium term.



1. What the Industry stands for

Protecting Ireland's Grass Based System

The entire sector is committed to working constructively to support the state in retaining the nitrates derogation. It is evident that Ireland can secure its nitrates derogation at its current level, while ensuring that there are improvements in environmental condition through science-led measures which enable good water quality. Ireland, as a grass-based country, fully satisfy the main conditions required to secure a nitrates derogation under EU law, including criteria such as a long grazing season, crops with a high nitrogen requirement and denitrifying soils. Regardless of the reduction in the number of EU member states securing a derogation in recent years, Ireland's grass-based system cannot be compared to the soil types and production systems of other EU member states. Furthermore, water quality in Ireland is relatively good in a European context. There is concern that any further reduction to the nitrates derogation will drive farmers to a more global, indoor type of dairy production, with unfavourable economic, social and environmental consequences. Critically, This may reverse the active participation and the progress achieved by the agricultural sector in protecting our water quality resource.

The entire industry is committed to working collectively with the Government and all other stakeholders to continue to protect and improve water quality. This includes support for new measures to develop awareness and promote best practices with respect to water quality. The current nitrates regulations need to be respected by all farmers. This must be clearly communicated by reference to the long-term implications of failure to comply. Current rules must be enforced and compliance achieved by all farmers. Inorganic nitrogen allowances should be implemented in line with the Department of Agriculture, Forestry and the Marine (DAFM)'s AWQWG recommendations. The industry together with farmers will support and encourage this recommendation.

Sector wide commitment to Water Quality

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Recognition that nitrates derogation allows Irish farmers to compete fairly with their European counterparts

Many have construed that the nitrates derogation gives Irish farmers a competitive advantage over other European farmers. This is not the case – instead it allows Irish farmers to maximise their one differential benefit over other European farmers – our grass-based livestock systems. This is critical as Irish farmers have many competitive disadvantages including high wages and energy costs. In addition, unlike many other European farmers, they currently do not have the option of exporting organic nutrients to anaerobic digestion plants.

While Ireland may be the only EU member state availing of a nitrates derogation in future years, there are many other member states who avail of derogations to EU regulations or directives in other areas. For example, many member states avail of ongoing pesticide derogations, while other member states continue to avail of derogations to the Industrial Emissions Directive.

Family Farm Model, Generational Renewal & Co-op Ownership

The foundation of Ireland's farming sector is based on the family farm model, often supplying their produce to a farmer owned co-operative system, particularly in the case of the dairy sector. This has worked well since the foundation of the State, and it should continue long into the future. Policy changes that impede this structure need to be opposed; accordingly, all efforts should be used to maintain Ireland's nitrates derogation. This is critical to the social, economic and environmental fabric of rural Ireland, and to supporting the continuation of farming into the future.

The loss of the nitrates derogation would completely undermine Ireland's grass-based family farm model of production, jeopardising generation renewal on Irish farms. Moreover, this would directly contravene a key objective of the European Commission to support generation renewal in agriculture through the Common Agricultural Policy (CAP). Ensuring generation renewal is key to the sustainability of the family farm model and co-operative system that is instrumental in achieving water quality objectives in balance with farm business viability, enhancing local employment and public good generation.



2. What is needed as a sector?

Fair analysis of the impact of agriculture on water quality

The sector fully accepts that agriculture has an influence on water quality. However, it is not the only pressure. Failings in other sectors, such as urban wastewater, cannot be allowed to jeopardise Ireland's ability to retain a nitrates derogation. It is imperative that the impact of non-agricultural nutrient sources on water quality is fully quantified, appropriately apportioned, and communicated. Any water quality parameters agreed upon with the European Commission cannot be negatively influenced by non-agricultural water quality pressures.

No further reduction to organic N limits

The implications of a further reduction in organic N limits will have a significantly higher proportionate economic impact on the agricultural economy compared to other sectors. Consideration should be given to combining both organic and inorganic N allowances as part of the next Nitrates Action Programme (NAP) which would reward farmers who are making continued and increased efforts to reduce their use of inorganic nitrogen.

Priority for Government / National Effort

The cabinet memo confirming Government support for the renewal of the nitrates derogation along with the recently published "Water and Agriculture, a collaborative approach" plan is welcomed. It is the view of the sector that the Taoiseach should lead a cabinet sub-committee chiefly tasked with coordinating the crossover roles of the relevant government departments that will be involved (DAFM, Housing, DECC, Rural Affairs, Enterprise & Trade) in securing the nitrates derogation in the forthcoming review.

Provide farmers with long-term certainty on the derogation

The current 4-year cycle with a 2-year interim review means that farmers availing of a derogation cannot plan effectively beyond a 2-year period. However, investments that help protect water quality, such as nutrient storage, are long-term investments often financed over a 10-year timeframe. It is completely unreasonable to ask farmers to undertake long-term investments with this level of short-term policy uncertainty.

Economic, social and environmental impact assessment

A full impact assessment into the economic, social and environmental implications of a potential further reduction to organic N limits granted under the nitrates derogation is urgently required. This assessment should include an analysis of the regional effects a further reduction would have on the agricultural industry and rural economy over the short, medium and long term.

The lack of a comprehensive state commissioned impact assessment to date is deeply frustrating. It is essential therefore that this analysis is conducted before 2025 when the next negotiations on the renewal of Ireland's nitrates derogation commences.

Enhanced levels of engagement with farmers

Teagasc, LAWPRO, industry and private advisory services can make a real difference in driving change. Teagasc, as the state agricultural science body, have developed a clear strategy; 'Better Farming for Water – 8 Actions for Change'. Importantly, this campaign needs immediate implementation at farmer level but will only be achieved with appropriate funding. It is imperative that resources are focused on the enabling factors that support water quality improvement as outlined in this strategy. Moreover, current programmes that are focused on water quality need to be encompassed into this clear national strategy. To this end, meat and dairy processors will continue to invest in their own advisory resources and develop champion river catchments within their respective areas.

Farm families have made huge strides supporting Bord Bia sustainability and quality assurance schemes across all sectors since 2012. The ongoing development of improvements and investment at farm level should be highlighted to credit farmers for their continuous efforts that support good water quality and should be encouraged further.

Access to user-friendly local and national water quality data

There is a general collective understanding of the importance of protecting water quality. However, for meaningful engagement and to support collaborations which increase the ownership of water quality challenges among all stakeholders, there is a need to provide greater transparency and local relevance of water quality data. Forming part of this broader stakeholder network and local catchment communities, farmers are keen to access water quality trends for their own local water bodies. While data is available in principle via www.catchments.ie, it is quite difficult to access, analyse and interpret. In addition, it is often unclear what the data represents in terms of water quality. There is a need for better communication on water quality data and the delivery of actionable knowledge to farmers that can specifically support decision making, behaviour change and the spatial identification of nutrient distribution at farm scale. A fit-for-purpose smartphone application should be developed to facilitate farmers in accessing and interpreting water quality trends at sub-catchment, catchment and national levels.

This would greatly increase the accessibility, timeliness and relevance of water quality data to farmers, and thus help better inform farm business decisions.

As part of this initiative and the 'Better Farming for Water' campaign, further awareness of the Nutrient Use Score (NUS) of individual farms should be explored, supported by tailored advice for each sector e.g. dairy, drystock, and tillage.

Additional measures introduced must be given time to take effect

The 5th NAP introduced a significant number of new actions intended to reduce nutrient loss from agriculture and to improve water quality. These new measures are additional to the range of higher conditionality associated with the nitrates derogation introduced since 2018 (see annex 2). The measures introduced under the 5th NAP are wide ranging in scope and impact. Such impacts are currently assessed through the Agricultural Catchments Programme (ACP), and the increase in funding announced in 2024 to support these efforts is welcomed.

Measures currently implemented deserve time to be enacted and their impact on water quality assessed. Notwithstanding the importance of the ACP, the ongoing lack of spatially extensive long-term research and monitoring programmes designed specifically to assess the recovery of degraded river ecosystems to the tailored solutions currently being implemented by the agricultural sector means that trajectories and timelines of ecosystem response to measures remain uncertain. This is compounded by the evolving array of natural and human pressures, including climate change, population growth and urbanisation, that are impacting the ecological status of both Irish and European rivers. The government and European Commission must acknowledge that the range of new actions undertaken by farmers will require time for their full benefits to materialise, and that the trajectories of change are uncertain. The expectation placed on the agricultural sector towards delivering good water quality must therefore be managed accordingly informed by, and trusting in, the suite of measures currently being delivered that are informed by best practice science. The Government should compile, in advance of the next negotiations, a strong science-based document, with EPA input, similar to the Marginal Abatement Cost Curve (MACC) curve for greenhouse gas emissions. This comprehensive science-based case, supported by best available evidence for the Irish context, is needed to map out the most effective water quality mitigation measures at catchment scale and provide realistic time horizons for the actions adopted by farmers.

Full Consultation

The terms of the last interim review were unachievable. There should be no agreement to any further water quality conditionality without prior consultation with the entire sector. Any additional measures that are needed to retain the current stocking rate must have realistic timeframes with achievable and quantifiable goals. There must be a realistic funding model in place to achieve these goals.



3. Funding and support vital to maintain a profitable and sustainable sector.

Immediate implementation of a nationwide fully funded and resourced national water quality protection programme

Water quality is the responsibility of all farmers, not just those in derogation. While the Agricultural Sustainability Support and Advisory Programme (ASSAP) is a welcome initiative, it needs additional funding and resources to have the required nationwide impact. A fully funded and resourced national water protection programme, which covers all sectors and farm types, is immediately necessary to provide long term characterisation of trends. This programme should aim to develop targeted farm-specific measures (e.g. riparian zones, catch crops) that will have a positive impact on water quality.

A clear Government led strategy is required to support water quality initiatives. There already is strong industry and government support for the recent 'Farming for Water' European Innovation Partnership (EIP). In conjunction with this, the recent launch of the Teagasc 'Better Farming for Water - 8 Actions for Change' - a national awareness campaign is aimed at supporting and accelerating the adoption of actions on all farms to improve all water bodies (where agriculture is a significant pressure) to the achievement of at least good ecological status as defined under the Water Framework Directive (WFD). With the support of all stakeholders, it is important that the roll out of this programme is designed to maximise water quality improvements measured at national level, with farmer involvement at its core.

Funding

For a government and stakeholder strategy to be effective on the ground and in every river catchment in the state, further funding will be required to support investment. This is critical to meeting water quality goals. Funding from the NRRP and the ICNF needs to be directed towards agricultural investment in the first instance. Funding for nutrient storage needs to be available to all farmers. It is vital that when this fund becomes available, agriculture and specifically water quality infrastructure measures are prioritised and 'shovel ready' to build with all planning secured.

The ICNF and the NRRP should be mobilised to support on-farm investments in measures to improve water quality such as nutrient storage and drive the recommendations of the AWQWG. This funding would represent just a fraction of the loss of output and export sales that would cause a generational splinter of the economy of rural Ireland.

The Infrastructure, Climate and Nature Fund should be mobilised to support on-farm investments in measures to improve water quality such as nutrient storage and drive the recommendations of the AWQWG. This funding would represent just a fraction of the loss of output and export sales that would cause a generational splinter of the economy of rural Ireland.

Planning

Planning laws in Ireland are weighted against developments that need to be expediated given our common law approach. A fair and rigorous planning system is a goal that can be achieved even with quicker decisions. However, a system that places the same weight on those who are not impacted by a development as those who are directly involved is not conducive to quick decisions and is leading to unnecessary delays and uncertainty for businesses. The new Planning and Development Bill, when enacted into law must lead to expedited developments as appropriate. It is essential that the Minister for Housing, Local Government and Heritage delivers a planning exemption on the construction of nutrient storage facilities on farms. This exemption needs to facilitate the construction of stores of significant size without excessive conditionality that could hamper the exemption's effectiveness.

Nutrient Storage

Medium-term certainty is needed to give farmers the confidence to invest in long-term assets i.e. nutrient storage, of which more is needed on farms throughout the country. The government must act to de-risk the situation now facing farmers who want to increase their storage capacity. The increased uncertainty over the future of the nitrates derogation is a very significant blockage, while potential future changes to nutrient storage requirements that have been signposted by the government also add further doubt. Furthermore, increasing rainfall patterns, as experienced this

year, is creating additional nutrient storage challenges at farm level. The industry is calling on the government to implement the following policy decisions related to nutrient storage:

- Provision of a 70% TAMS grant with a separate ceiling for all farmers investing in nutrient storage facilities based on regularly updated construction costings (3-month update cycle).
- Investments in nutrient storage should be prioritised for fast-track TAMS approvals.
- Farmers should be permitted to apply for TAMS funding for nutrient storage prior to obtaining planning permission or a planning exemption thereby significantly reducing the overall lead-in time prior to commencement of construction of facilities. Planning permission/exemption can be verified at drawdown of TAMS funds.
- Access to grant aid for farmers who are not in full compliance with regulatory requirements should be considered for situations where they commit to going beyond regulatory requirements.
- Provide clarity as quickly as possible on future additional nutrient storage requirements.
- Prioritise the use of the ICNF and the NRRP to provide the necessary funding for a national nutrient storage project in the context of climate adaptation.

Prioritise the use of the new Infrastructure, Climate and Nature Fund to provide the necessary funding for a national nutrient storage project in the context of climate adaptation.





Conclusion

The loss of the nitrates derogation would have a yet unquantified economic impact on rural Ireland, the scale of which cannot be underestimated. Accordingly, there is an onus on all stakeholders to work together to eliminate this risk. The representative organisations of the primary and processing producers of dairy and meat products in Ireland have come together to deliver on the three priority areas outlined above. All industry and farm organisation stakeholders believe that these principles are the bedrock of securing the new derogation post 2025, while enabling good water quality, so that the present family farm model remains not only viable but sustainable into the next decade and beyond.

Annex 1: Agencies/Programmes in place to protect and enhance water quality

'Better Farming for Water' advisory campaign

Teagasc are leading a multi-actor water quality advisory campaign to deliver clear, simple and positive messaging to enhance farmers', as well as the broader agri-food industry's understanding of the agriculture pressures on water quality and the need for improvement.

The aim of the '**Better Farming for Water**' campaign is to support and accelerate the adoption of actions on all farms to improve all water bodies (where agriculture is a significant pressure) to 'Good' or 'High' ecological status.

The 8-Actions for Change of the campaign aim to:

- Reduce purchased nitrogen (N) and phosphorus (P) surplus per hectare.
- Ensure soil fertility is optimal for lime, phosphorus and potassium.
- Ensure application of fertiliser and organic manure at appropriate times and conditions.
- Have sufficient slurry and soiled water storage capacity.
- Manage and minimise nutrient loss from farmyards and roadways.
- Fence off watercourses to prevent bovine access.
- Promote targeted use of mitigation actions such as riparian margins, buffer strips and sediment traps to mitigate nutrient and sediment loss to water.
- Maintain over-winter green cover to reduce nutrient leaching from tillage soils.

Agricultural Catchments Programme (ACP)

The **ACP** commenced in 2008. The programme is coordinated and managed from the Teagasc Environmental Research Centre in Johnstown Castle. The same experiment has been run over the course of the programme in six catchments covering a range of landscape/soil/farming combinations.

Local Authority Waters Programme (LAWPRO)

LAWPRO is a national shared service working on behalf of all 31 local authorities in Ireland. They coordinate efforts to achieve at least good water quality in our rivers, lakes, transitional and coastal waters, and groundwater, as required by the EU WFD.

Farming for Water EIP

The 'Farming for Water' EIP aims to deliver targeted actions to reduce losses of nutrients, sediment and pesticides from agricultural lands, i.e. 'breaking the pathway'. The programme will run from 2023 to 2028. The project will focus on areas needing the most attention to protect water quality.

Agri Climate Rural Environmental Scheme (ACRES)

Using a habitats-based approach, delivered through both multi-functional prescription and results-based actions, ACRES aims to contribute significantly to achieving improved biodiversity, climate, air and water quality outcomes.

Agricultural Sustainability Support and Advisory Programme (ASSAP)

ASSAP is a jointly funded programme involving Teagasc, the Dairy Co-ops and LAWPRO. Currently over 50 ASSAP advisors are working with farmers in a free and confidential advisory service to help improve water quality. The role of the ASSAP advisor includes:

- Providing farmers with a free, confidential and voluntary advisory service.
- Providing farm specific assessments and plans to prevent the loss of nutrients, sediment and pesticides from entering waters.
- To explain the key water quality messages to the wider agricultural community.

The Blue Dot Programme

The objective of this programme is to protect and restore Ireland's High status surface waters under the WFD. This means that water bodies that are High Status should not decline to Good Status or worse. The EPA have identified the waters in Ireland that should have a high-status objective, and these are more commonly known as Blue Dot waters or Blue Dots. Ireland's Blue Dot Waters include rivers, lakes, estuaries, and coastal waters.

Waters of LIFE strategic project

The **Waters of LIFE** is an EU LIFE Integrated Project (IP) which aims to help reverse the deterioration of Ireland's most pristine waters.

Co-op Sustainability Programmes

Dairy Co-ops and processors have introduced new sustainability programmes to support their milk suppliers undertaking sustainability initiatives on their family farms. These incentivised programmes are aligned with the greenhouse gas abatement measures under MACC led by Teagasc. Furthermore, they have all incorporated a water quality measure, aligned to ASSAP, to reduce nutrient loss and ultimately improve the condition of watercourses (streams, rivers, lakes, estuaries etc; see annex 3).

Annex 2: Principal changes to Ireland's Nitrates Action Programme 2018 to Present

Figure 1: Principal changes to Ireland's Nitrates Action Programme (NAP) from 2018 to present.

2018	2020	2021
<ul style="list-style-type: none"> • Soil Sample: 5ha every 4 years • Simplification - last year's data • P build up - Index 1&2 • Increased KT - Training and ASSAP • Autumn P on tillage 30th Oct • Increased penalty - rejection • 50% slurry by 15 June & LESS 	<ul style="list-style-type: none"> • Training: NUE, sustainable farming, grassland mgt / budget • Biodiversity requirement • Clover to grass reseed 	<ul style="list-style-type: none"> • Dairy cow N rate 85 to 89kg • Farm roadway camber away from water • Max 15% protein in conc to grazing cows • 4 year liming programme • LESS from 15th April • Exclude cattle from • 1.5m from watercourse • Water Trough 20m from watercourse
2022	2023	Future Actions
<ul style="list-style-type: none"> • Commonage SR <50kg and no chemical N • 10% cut in chemical N • GSR>170 Soil test & LESS • Soiled water closed period • Slurry spread by 8th Oct • Slurry content - N&P content and online notification • Tillage green cover • Plough grassland only between 1st March and 31 May • Increased inspections - 10% 	<ul style="list-style-type: none"> • GSR>150 - LESS and >130 Soil test • Soiled water closed period - 21 days • All slurry spread by 1st Oct • N excretion bands based on milk yield • Fertiliser register • Chemical N closed period +14 days • 3m buffer for all chemical fertiliser • Silage bales stored 2m high • Tillage buffer strips 3&6m • Local authority inspections - more targeted 	<p>2024:</p> <ul style="list-style-type: none"> • Purple areas at 220kg/N/ha • Soiled water closed period - 31 days • GSR>130 LESS <p>2025:</p> <ul style="list-style-type: none"> • GSR>100 LESS • Reduced storage through outwintering <100

Source: DAFM/Teagasc

Annex 3: Summary of co-op sustainability programmes

Co-op / Processor:	Sustainability Programme:			
	<p>Arrabawn – Milk Supplier Sustainability Bonus 2024:</p> <p>Arrabawn Co Op has introduced a sustainability bonus, called the Arrabawn Milk Supplier Sustainability bonus, which they offer to their milk suppliers who undertake impactful sustainability measures on their farm. Suppliers who opt into this scheme in 2024, have the potential to receive a bonus payment of 0.5 cent per litre (cpl) on a monthly payment in exchange for meeting three sustainability criteria: 1. Using Protected Fertiliser 2. EBI Improvement 3. Milk recording.</p> <div style="border: 2px solid blue; padding: 10px; text-align: center;"> <p>The Arrabawn Milk Supplier Sustainability Bonus 2024:</p> <p><i>0.5 CENT PER LITRE (CPL)</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: #0070c0; color: white; padding: 10px; text-align: center;"> Protected Fertiliser 0.2cpl </td> <td style="background-color: #0070c0; color: white; padding: 10px; text-align: center;"> EBI Improvement 0.1cpl </td> <td style="background-color: #0070c0; color: white; padding: 10px; text-align: center;"> Milk Recording 0.2cpl </td> </tr> </table> <p style="background-color: #0070c0; color: white; padding: 5px; text-align: center; margin-top: 10px;">Total 2024 Bonus 0.50 CENT PER LITRE (CPL)</p> </div>	Protected Fertiliser 0.2cpl	EBI Improvement 0.1cpl	Milk Recording 0.2cpl
Protected Fertiliser 0.2cpl	EBI Improvement 0.1cpl	Milk Recording 0.2cpl		

Co-op / Processor: Sustainability Programme:








Aurivo – Future Milk:

The Future Milk Bonus introduced by Aurivo in March 2024. Milk suppliers that meet the criteria will receive a bonus payment of 0.5 cent per litre (plus vat) per month. The measures have been carefully selected to focus our suppliers on meeting emissions targets and improve water quality. Aurivo is seeing very strong interest in this new initiative as it is worth approximately €2,500 for the average supplier. A summary of the measures under the Aurivo Future Milk Sustainability Programme are as follows:

Aurivo “Future Milk” Sustainability Programme

■ Programme measures.

- Compulsory measure
 - Complete Bord Bia Sustainability survey annually
- Complete 3 from 6 measures
 - 4 Milk recording per year.
 - 1 Tonne of Protected Urea per 100,000lt of milk supplied
 - SCC Below 150 or reduce by 5% annually.
 - Attend a Water training event annually
 - Use dairy bulls with a min €230 EBI & beef bulls' min €100 DBI
 - Genotype replacement heifer calves born in the herd each year.

Carbery – Future Proof:


The four West Cork co-ops and Carbery have introduced a sustainability bonus, called FutureProof, which they offer to milk suppliers who undertake impactful sustainability measures on their farm. Co-operative suppliers who opt into this scheme in 2023 received a bonus payment of 1.0 cent per litre (“cpl”) on all milk supplied in 2023 in exchange for meeting four sustainability criteria:

Agreeing to undertake an on-farm ASSAP assessment;

- Using Protected Urea;
- Milk Recording; and
- Implementing Economic Breeding Index for genetic gain.


Carbery have chosen to implement these four measures, as they are impactful, measurable and proven to work. Importantly, they believe they will have significant impact on environmental indicators, especially around emissions and water quality.

In addition, Carbery have pioneered the Farm Zero C project, which is a collaboration between Carbery, BiOrbic and others to create a climate-neutral, economically-viable dairy farm.




Water Quality

Ensuring a high standard of water quality through expanding the ASSAP programme




Protected Urea

Increasing the use of protected urea



Economic Breeding Index

Implementing EBI best practice for genetic gain to maximise profitability and sustainability of herds



Milk Recording

Collecting information about the performance and quality of herds.

Co-op / Processor: Sustainability Programme:

Dairygold – Grassroots:

The Grassroots Sustainability Bonus introduced by Dairygold presents milk suppliers with the opportunity to receive a total of 0.75 cent per litre (equivalent). The Grassroots Bonus aims to reward milk suppliers who undertake six specific actions to improve the sustainability of their farm, including:

- Agree to Water Quality Farm Visit and development of a Water Quality Plan
- Purchase Protected Urea
- Participate in Dairygold's GreenGrow Soil Health Programme
- Complete Training Modules and Farm Plan
- Participate in Milk Recording
- Participate in a Herd Health Programme



The Grassroots Bonus Programme is a proven, practical and innovative way in which Dairygold farmers can both improve efficiency and continue in their role as guardians of nature and the environment. Over 92% of Dairygold's milk comes from suppliers who have signed up to the Grassroots Programme. Through the Grassroots Water Quality Programme we have conducted more than 1,100 water quality visits and targeted action plans to protect and improve water quality. Our ongoing protected urea advocacy has driven a 31% increase in usage amongst Dairygold farmers. Our state of the art laboratory in Lombardstown, conducts biological and chemical soil tests that support our Grassroots Programme.

Co-op / Processor:
Sustainability Programme:

Lakeland Daires – Farming for a Better Future:

Lakeland Dairies have introduced a Sustainability Incentive Payment (2024-26) to assist their farmers to continue taking positive actions on their farms as part of Farming for a Better Future. The payment is 0.5c/litre at 3.6% Butterfat and 3.3% Protein on all monthly litres. To qualify for the payment, a farmer must complete five measures from a list of 12 set by the Board of Directors of Lakeland Dairies.



Measure	Requirement	Validated By
Age at first calving*	80% of heifers calving before 26 months	Co-op Performance Report (ICBF)
Dairy Beef Index (DBI)*	Minimum DBI across beef bull team of €120	Sire Advice Report (ICBF)
Development of a water quality plan	Development of water quality plan in conjunction with an ASSAP advisor	Lakeland Dairies records
Diverse Membership	Add a family member / partner to the shareholding. This person's name must be on the associated herd number and milk account	Lakeland Dairies records
Economic Breeding Index (EBI)*	€10 EBI increase per year. Automatic qualification if farm is in the top 20% of Lakeland Dairies herds	Co-op Performance Report (ICBF)
Genomic testing*	Genomic Testing all breeding heifer calves	Genomic Evaluation Report (ICBF)
Milk recording*	Minimum of four milk recordings per year	Milk Recording report
Nutrient Management Planning	Produce an up-to-date Nutrient Management Plan including soil samples taken within the last two years	Nutrient Management Plan
Planting of hedgerows OR trees	10 Trees per 100,000L milk supplied in previous year OR 5 metres of Hedgerow per 100,000L milk supplied in previous year	Physical verification of planting
Protected urea*	0.5 tonne Protected Urea purchased per 100,000L milk supplied in the previous calendar year	Invoice (automatically verified where purchased from Lakeland Dairies)
Sexed Semen*	25% of dairy straws sexed	Invoice showing purchase of sexed semen straws
Somatic Cell Count (SCC)*	5% reduction per year, under 150,000 cells/ml automatically qualifies for payment	Lakeland Dairies records

Over 500 milk suppliers have chosen “Development of a Water Quality Plan” as part of Farming for a Better Future. Lakeland Dairies have actively promoted best practice around soil health and nutrient use efficiency for many years. Since 2015, approximately 6000 soil samples are analysed per annum under Lakelands Dairies Soil Health Programme.

Co-op / Processor: Sustainability Programme:

Kerry - Evolve Dairy Sustainability Programme:

Kerry Milk Suppliers are incentivised to take sustainability actions across a range of areas including Biodiversity and Water Quality, Soil and Fertiliser Management, Herd Production and Grass Management, Animal Health and Welfare and Knowledge Transfer. In 2023, the Kerry Evolve Sustainability Bonus is worth up to €2,700/herd based on an average 80 cow dairy herd.



	Action	Detail
Biodiversity & Water Quality	Planting Native Irish Trees	Kerry is partnering with Trees on the Land to fund a biodiversity programme across our catchment
	Protecting Our Waters <i>NEW FOR 2023</i>	Complete a free farm assessment with a Kerry Agribusiness Water Quality Advisor and undertake agreed action(s) to reduce nutrient loss to waterbodies from the farm
Soil & Fertiliser Management	Nutrient Management Plans	Undertake soil sampling in the period Sept 2022 to April 2023 (T&C's apply)
	Lime	Purchase lime via an approved supplier up to a maximum of 1 tonne/cow
	Protected Urea	Purchase of protected urea via Kerry Agribusiness
	Slurry Analysis	Slurry analysed via approved laboratory
Herd Production & Grass Management	Milk Recording	Participation in Munster Bovine Milk Recording (min 4 tests)
	Low Protein Feed	Purchase feed from Bloom Feeds low protein range
	Grass Measurement	Greater than 5 covers on PastureBase Ireland (May to June)
Animal Health & Welfare	Herd Health	Participation in approved Munster Bovine Herd Health Programme
	DairyCare <i>NEW FOR 2023</i>	Participation in DairyCare programme
	Culture & Sensitivity	Engage in Culture and Sensitivity Testing
	Dairy2Beef Scheme <i>NEW FOR 2023</i>	Sell dairy-beef calves directly to Dairy2Beef farmers through the ICBF/Kerry App
Knowledge Transfer	Approved Development Event	Participation in approved sustainability related event (Breeding, Biodiversity, Financial, Grassland, People Management, Health & Safety)
	Kerry Agribusiness/Bord Bia Sustainability Course <i>NEW FOR 2023</i>	Complete and pass the Sustainability Course
	Kerry Agribusiness/UCC Sustainable Dairy Development Course <i>NEW FOR 2023</i>	Complete and pass the Kerry Agribusiness/UCC Sustainable Dairy Development Course

North Cork Creameries



North Cork Creameries has a strong history in supporting its farmers on water quality issues. It has been a founder member of ASSAP, Signpost, Switch and SDAS. The Co-op was central in the nationally acclaimed Duhallow 'Blue Dot' program.

2024 has seen the rollout of its own sustainability scheme which has strong nitrogen reducing incentives.

It also has selected another river- the Galey near Moyvane Co. Kerry to be a 'Champion River' as part of the Better Farming for Water national movement.



Tipperary Co-op

Tipperary Co-op have been pioneering the reduction of nitrogen usage on their own research farm for many years. It has heavily involved in ASSAP, Origin Green, Signpost & Dairy Sustainability Ireland.

Co-op / Processor:
Sustainability Programme:
Tirlán - Living Proof Sustainability Action Payment:

In 2022, Tirlán launched an €16 million annual Sustainability Action Payment to assist their 5,000 milk suppliers as they continue to enhance the environmental and economic sustainability of their family farms. The programme is designed to assist dairy suppliers in reducing their carbon footprint, enhancing water quality and biodiversity and improving air quality and soil health in line with Tirlán's sustainability strategy, Living Proof. As part of this initiative, dairy suppliers will receive 0.5 cent per litre (cpl) (including VAT) through delivering specific sustainability actions. Tirlán milk suppliers are requested to complete seven actions from a menu of 20 options to receive full payment.

The menu of options include:

Sustainability Action Payment – *Menu of Options*

Suppliers declare seven options in 2024 to receive full payment in 2025

1	2	3	4	5	6	7
<small>CARBON REDUCTION</small>	<small>CARBON REDUCTION</small>	<small>CARBON REDUCTION</small>	<small>CARBON REDUCTION</small>	<small>CARBON REDUCTION</small>	<small>IMPROVE AIR QUALITY</small>	<small>IMPROVE AIR QUALITY</small>
						
Measuring Grass Growth	Clover use	Multi-species swards	Milk recording	Improve Herd EBI	Low Emissions Slurry Spreading	Purchase of Protected Urea
8	9	10	11	12	13	Option 7 Protected Urea. Declaration of this action now represents two actions
<small>BIODIVERSITY</small>	<small>BIODIVERSITY</small>	<small>SOIL HEALTH</small>	<small>WATER PROTECTION</small>	<small>WATER PROTECTION</small>	<small>REDUCE FOSSIL FUEL USE</small>	
						
Additional native trees	Additional hedgerows	Soil Nutrient Management Planning	ASSAP water quality planning	Fencing off watercourses	Renewable energy generation	
14	15	16	17	18	19	20
<small>ANIMAL HEALTH & WELFARE</small>	<small>ANIMAL HEALTH & WELFARE</small>	<small>ANIMAL HEALTH & WELFARE</small>	<small>CARBON REDUCTION</small>	<small>ANIMAL HEALTH & WELFARE</small>	<small>CARBON REDUCTION</small>	<small>WATER PROTECTION</small>
						
Herd Disease Screening	Participating in Beef Twenty20 Club	Udder health – SCC improvement	Low protein feed	Use of sexed semen	Genotyping	Water Quality EIP



Across the period 2022-25, over €60 million in total will be made available to family farms as they continue to adopt a range of actions. Tirlán and its key dairy ingredients customer Baileys Irish Cream Liqueur collaborate through Ireland's first Sustainability Farming Academy to support farm families' positive environmental actions by offering bursaries to family farm milk and grain suppliers beginning their degree studies in Agricultural Science. The bursaries are worth €1,000 each. In addition, 20 Tirlán suppliers participate each year in a fully funded Diploma in Environment, Sustainability and Climate through UCC as part of the Sustainable Farming Academy. The work of the Academy is aligned with the United Nations Sustainable Development Goals, specifically focusing on Goal number four – Quality Education.

Farming for Water: River Slaney Project:

Tirlán with the support of enabling partners including Teagasc and LAWPRO have developed a collaborative initiative designed to enhance water quality across the Slaney River catchment area in counties Wexford, Carlow, and Wicklow called the *Farming for Water: River Slaney Project*.

This Project is closely aligned with the Government's EIP 'Farming for Water' project aimed at improving water quality at local, catchment, and national levels.

The project in Tirlán is delivered on-farm by a team of Tirlán farm advisors who utilise the best practice advice, focusing on improving farm economic and environmental performance to address water quality challenges, while protecting biodiversity. Core areas that the Tirlán team focus on include better nutrient use, improved milk solids, farm infrastructure and slurry storage capacity.

Annex 4: Meat Processor Sustainability Programmes

Kepak Twenty / 20 BEEF CLUB

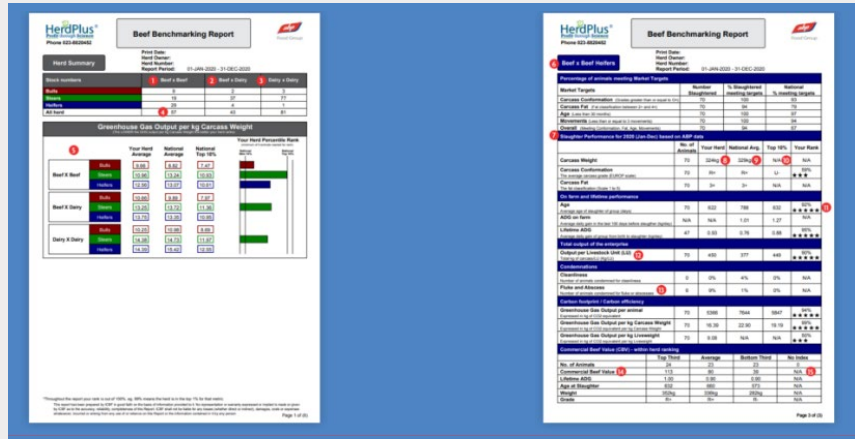


Dairy Beef Kepak/Tirlán Twenty20 calf to beef programme. The Twenty 20 Beef Club is a fully integrated calf to beef programme between Kepak Group, Tirlán and their respective farmer suppliers. The programme offers a fully traceable, closed loop input supply chain involving more than 20,000 calves annually. The Club's vision has sustainability at its core – both financially and environmentally. Improved feed efficiency with methane reducing feed additives, farm to fork traceability, genetic evaluation, technical support for participating farmers and a market premium for finished cattle combine to create a sustainable beef supply chain. Early analysis indicates the programme brings GHG emission reductions in the region of 20% relative to the national average.

ABP Advantage Beef & Benchmark Report



Incorporating both suckler and dairy calves, the Advantage Beef scheme encourages participation in breeding, genetics and sustainability programmes. Partnering with ICBF the Beef Benchmark Report being piloted by ABP represents a world first in terms of the provision of carcass and greenhouse gas data on an individual animal basis. The report has a strong focus on genetic improvement, comparing beef animals within a herd using ICBF's Commercial Beef Value (CBV) Index. It highlights the importance of breeding and buying high index animals to increase carcass quality and reduce age of slaughter, to enhance farm revenue and minimise each farm's carbon footprint. Results have shown improvement in profits of up to €200 per head are possible.



Newford Suckler Demonstration Farm



Established in 2015, the 68 hectare Newford suckler demonstration farm in Co. Galway represents a Dawn Meats/ Teagasc partnership supported by McDonalds & The Irish Farmers Journal. The farm demonstrates best practice on commercial cattle farms and shares learnings with suckler farmers to help drive the future viability of the sector. The farm is part of the Teagasc Signpost programme. The farm demonstrates best practice as follows:

- Calving interval – 37 days lower than the national average
- Age at first calving – 100% of heifers calved at 26 months compared to 23% nationally
- Finishing age –steers finished at 21 months, heifers at 20 months
- Beef output per hectare – twice the national average
- Net profit per hectare – €276 in 2021

Liffey Meats Green Logistics



Liffey Meats has embarked on a pilot programme with its logistics partner Virginia Transport to trial a move away from fossil fuelled to gas powered trucks. In October 2019, Virginia Transport completed its first zero carbon delivery to mainland Europe using a lorry fuelled by renewable gas, which led to a 22% reduction in CO₂ emissions relative to a diesel powered lorry. By the end of 2021 the majority of Liffey Meats deliveries to mainland Europe are delivered by trucks using compressed natural gas (CNG) thanks to Virginia Transport installing their own refuelling station at their headquarters. The potential for CNG to reduce CO₂ emissions is even more considerable when Bio CNG is utilised with Virginia Transport calculating an 84% reduction in emissions compared to a diesel equivalent.

In February 2023, Meat Industry Ireland (MII) launched their first [Beef Sector Sustainability report](#), committing members to eleven key actions to reduce carbon emissions. The report highlights the significant sustainability progress that has been made to date given the emphasis that is demanded by the marketplace. There is also strong focus on how the beef sector will contribute towards the 25% emissions reduction target for agriculture as set out in the National Climate Action Plan.

One of the actions is the commitment to publish the MII Beef Sustainability Charter which articulates the sustainability ambitions of the Irish beef sector to consistently deliver best practice in managing the natural environment, enhancing rural communities and supporting livelihoods across the supply chain. This Charter will be published in Q4 2024 and will be accompanied by a progress report outlining achievements to date.

Water Usage

All major processors have been actively working on delivering progress in relation to water usage levels, water recycling and water quality. Since 2015, the following improvements have been delivered by the beef sector:

- 8% reduction in absolute water usage, which equates to cumulative savings of almost 250,000m³
- Drop of almost 22% in water intensity over the period.

