IHFA submission re NAP
16/09/21

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Submission from IHFA

Re: Nitrate action plan proposals by DAFM

Date 16/09/21.

The Irish Holstein Friesian Association, IHFA, is a member owned organisation with a wide geographical spread. There are breeder members' farming from Donegal to Cork, Galway to Dublin on varied soil types and climatic conditions.

There are 3,400 members with 337,960 pedigree registered Holstein Friesian cows in milk production plus youngstock replacements.

The latest review of the Nitrates action Plan (NAP) and the proposed banding of production will have serious consequences for our sector. Two thirds of members herds are in the band 6,500 Kgs milk plus with one third between the 4,500 Kgs and 6,500 Kgs proposed band.

Additionally, there are further financial implications for IHFA herds in terms of market values of surplus stock, where demand from the commercial sector is constricted due to in effect an imposed capping of herd sizes.

The members are the main stay of milk recorded herds and have historically recorded ancestry and all relevant breed data. This is validated data which is so critical to the foundation and expansion of the national database at ICBF.

Members are to the forefront in adopting the most recent science and latest technologies in evolving breed improvement, production efficiencies, herd health and welfare and are a shop window for the breed in Ireland. Our members farm sustainably and are proud of the quality of their stock. It is their passion in life. They are the custodians of the breed.

IHFA support the objective that water quality and the environment must be protected and the group of dairy farmers represented by IHFA are already well informed, farming sustainably and adopting best practice in keeping with an excellent image of dairy farming, producing wholesome food from the Holstein Friesian breed.

The proposals need to take into account the financial impact on farm families, the rural economy and value of exports.

The Proposed banding system approach in our view is not correct.

- The improvements brought about through better genetics, feed efficiency and nitrogen use efficiency is being largely side-lined in the proposals.
- Cows in Band 3 are in the order of 14% more efficient than cows in Band 2 and 40% more efficient than cows in Band 1. (cows in Band 3 produce 1.23 kg FPCM/kg DM intake,

cows in band 2 produce 1.10Kg FPCM/Kg DM Intake and cows in Band 1 produce 0.89Kg FPCM/Kg Intake).

- The effect of the proposals is to increase the livestock numbers in band 1 to the order of 12% (with lower outputs) and reduce numbers in band 3 by 19% which have double the output of milk solids of Band 1.
- It proposes changes to the Nitrates in isolation of other environmental obligations. GHG emissions are to be reduced by 21% by 2030 and achieve climate neutrality by 2050 in the Ag Climate action plan.
- In a stable national herd, the 8.5 billion Kgs milk output can be achieved by 1.2 m cows from Band 3 compared with 1.5 m dairy cows currently. This would make a significant contribution to reducing GHG emissions to the order of 25%.
- The introduction of bands as proposed at this time is ill advised. It will have a negative effect on overall production and encourage inefficiencies. Farmers may mitigate the risk by shifting bands that ultimately reduce efficiencies and environmental performance.
- On the face of it the message from the proposed bands appears to be that high stocking rates with low outputs is acceptable and the way forward.
- Dairy farmers farming their present systems should not be gifted organic outputs lower than what is already accepted as industry standard, which is 85 Kgs of organic nitrogen output per cow. This apparent bonus in organic N excretion values to a cohort of dairy farmers is an inequitable approach. This is contrary to the CAP strategic plan linking environment with climate legislation.
- The lower band of 4,500 Kgs milk needs to be examined further in terms of beef from the dairy herd
- Calf quality produced from this cohort of herds is largely not transferable to a beef system. Calves are too small and are not capable of reaching profitable targets. They have to be carried for an extra six months invariably to reach slaughter carcass weights, and are out of spec for fat cover incurring severe penalties. This puts a further question over whether beef from some dairy herds is sustainable.
- Nitrate leaching is a consideration at all levels and varies significantly from year to year. This is especially a risk to water quality where intensive stocking rates leading to bare soils are practiced on the milking platform, commonly associated with a cohort of dairy farmers at the lower band.

If Banding has to be introduced, IHFA propose that the DAFM introduce two bands around a standard output above and below 5,500 Kgs milk per cow.

- This will have the advantage of keeping the system simple for all dairy farmers.
- It will ease farmers into a new approach.
- It needs to be based on production level of the prior year so that farmers can plan their stocking rates in the current year.
- A Flexibility mechanism is required around the bands to avoid cliff-edge changes impacting on farm management. Such a mechanism should be considered to reduce stock movements.
- The bands can be reviewed going forward as to requirements for a further break down of the production levels if necessary.

There are additional considerations to reducing the organic nitrogen outputs.

- Introduce a feed efficiency factor in the breeding index.

- Legislating for lower crude proteins in rations.
- Increased clover and multiple species in seed mixes.
- Increased monitoring of soil fertility status and liming.
- Biological treatment of slurry to reduce environmental impact while increasing nutrient value.
- Research into feed additives to improve rumen efficiencies.
- Expansion of the ASSAP programme.

Other concerns in the proposals are

Soiled Water: Members have invested heavily in their yards over the last 20 years. They are now asked to do more. They need to be financially supported with a combination of tax breaks, increased capital allowances and grants to carry out this extra investment.

Where members have ample slurry storage there is no reason why soiled water should be stored separately.

Dairy washings contain trace level of Nitrates and dairy farmers in winter milk should be allowed to be spread during the closed period.

Forage crops, forage Maize and especially whole crop under sown to grass should be included in the forage crop area as well as grass.

The 30kms limit on lands included in stocking rate should not be a blanket regulation.

Each genuine farmer should be judged on their merits. The average farm in Ireland consists of 3.5 land parcels (O'Donnell 2014). A survey of Tipp Co-Op suppliers 2016 found that for every hectare that farmers have on the milking platform they have another 0.6/0.7 Ha. away from the milking platform (Mullane 2016)

Messaging

The communication around the NAP proposals is such that it is perceived as regulation and restricting the farming business.

The message would be better received if the benefits to the farming business were incorporated and how the image and marketability of food production is enhanced.

The NAP proposals have major implications for all sectors especially dairy farming. In the interest of getting the best outcome, an extension to the period of consultation is required so that the data underpinning the proposals can be made available and examined further.

Charles Gallagher
Chief Executive.