

**IFA submission
to the public consultation on the Draft Code of Good Agricultural
Practice for reducing Ammonia Emissions from Agriculture.**

**The Irish Farm Centre
Bluebell
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The Irish Farmers' Association (IFA), as Ireland's largest farming representative organisation, is making this submission to seek the introduction of a *Sustainability Development Programme (SDP)*, to assist the agriculture sector comply with ammonia emissions' targets.

Farmers are fully engaged in farm management practice to address ammonia emissions on their farms. For example, the Low Emissions Slurry Spreading (LESS) grant-aid scheme, operated by the Department of Agriculture, is the key measure for reducing ammonia emissions. Farmer applications to participate in this scheme is at such a level that LESS equipment manufacturers are reporting a 16-18 week waiting time for delivery of equipment.

The draft Code of Practice also outlines other additional measures that farmers undertake, including:

- Applying at least 50% of slurry by 15th June each year on higher stocked farms, with the remainder being spread using LESS equipment, as required.
- Using Nutrient Management Planning Online and grass management tools, such as Pasture Base.
- Moving beyond regulatory obligations, by participating in the Agricultural Catchments, Smart Farming and ASSAP programmes.

The delivery of the SDP, which is outlined in detail in earlier submissions to the Department of Agriculture¹ will be essential to "avoid potential fines and negative reputational damage", as referenced in the consultation document. Delivery of this SDP will also require resourcing. Exchequer funding for the SDP should be considered in the context of fines avoided. This is a similar strategy to the recently published Climate Action Plan, which aims to avoid 2030 fines of €1.75bn for non-compliance.

Specific measures in the SDP, which will have a positive impact on ammonia emissions, include:

- Updating the Low Emissions Slurry Spreading Scheme.
- Supporting greater use of protected urea, lime and slurry additives.
- Supporting anaerobic digestion and on-farm renewables.

Updating the Low Emissions Slurry Spreading Scheme

The existing Low Emissions Slurry Spreading (LESS) scheme, which is currently well backed by farmers, requires additional support to escalate action to address air quality (ammonia) challenges. Therefore, **IFA proposes:**

- **That the overall grant aid available for individual farmers is increased to 60%.**

¹ IFA (2019) *IFA submission to the Department of Agriculture, Food and the Marine "2019 Nitrates Derogation Review"*

- That the separate limit to general TAMS is increased.
- That it remains a strong measure in an enhanced GLAS.
- That investment in LESS equipment is VAT exempt.

Supporting greater use of protected urea, lime and slurry additives

The use of coated or “protected” urea is recommended by Teagasc, to help address climate and ammonia challenges; they report that using protected urea can reduce ammonia losses into the atmosphere by 80% compared to standard urea. However, ‘protected urea’ is more expensive to purchase.

To stimulate demand, IFA proposes that DAFM should introduce an incentive scheme, which closes the price differential gap and includes an additional top-up to incentivise up-take of ‘protected urea’.

Lime is an important element to neutralise the acidity in Irish soils and restore them to optimum soil pH to support crop growth and overall soil quality, while reducing risk of run-off and nutrient losses. However, with two thirds of soils in Ireland at sub-optimum pH level and lime use at mid-1980s’ levels (figure 8), there is an urgent need for DAFM to introduce a liming scheme to support use on Irish farms, as suggested by Teagasc.²

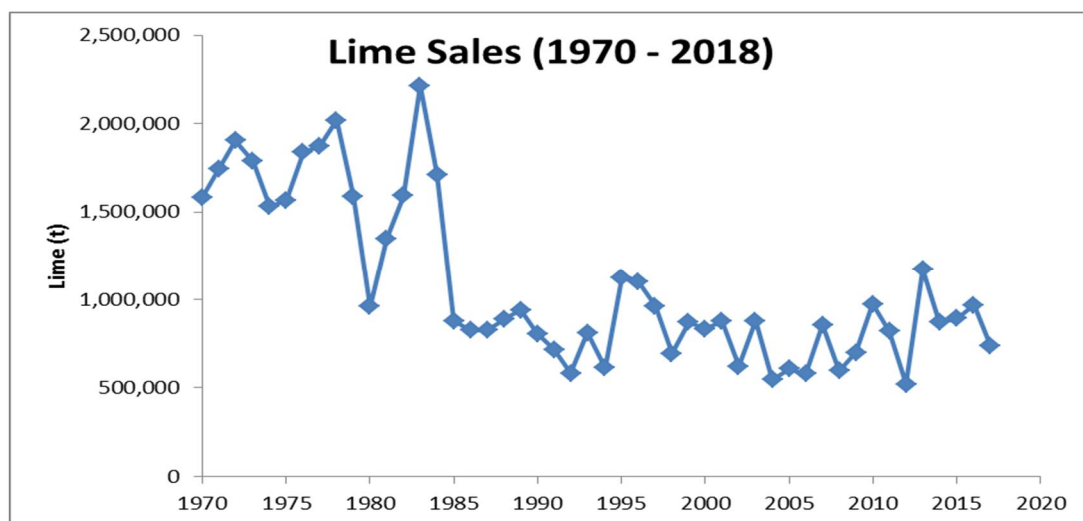


Figure 8: Lime sales in Ireland 1970 – 2018

Source: DAFM

IFA proposes that a liming grant support scheme should be introduced to support healthy soils and crop growth and to reduce impact on the environment from farming practices.

Additives applied to slurry stored during winter are recognised by Teagasc³ as helping to reduce emissions. However, such slurry additives are costly and some farmers have questioned the efficacy of the claims made by the slurry additive suppliers.

² Farming Independent (2018) *Teagasc baffled by ongoing decline in lime application*. Accessed online: <https://www.independent.ie/business/farming/beef/teagasc-baffled-by-ongoing-decline-in-lime-application-37446111.html> 22nd May 2019

³ Irish Examiner (2018), *Positive result for slurry additives* Accessed online: <https://www.pressreader.com/ireland/irish-examiner-farming/20181101/281732680487113> 22 May 2019

IFA proposes that a support is put in place to encourage slurry additives uptake, and that Teagasc or DAFM publish an annual list of slurry additive products that they have tested and which can deliver the outcomes claimed.

Supporting anaerobic digestion and on-farm renewables

Micro-energy, anaerobic digestion, farm-scale and community renewable energy projects have all been recognised for a long time as important tools to displace fossil fuel use in rural areas, reducing environmental risks (water / air / climate) and generating alternative income streams. Most recently their important role was highlighted in the Oireachtas Committee on Climate Action cross-party report.⁴ However, grid connection, price supports and planning changes are required to drive delivery of these measures.

IFA proposes that:

- **The Department of Agriculture should, similar to the LESS grant scheme, remove the overall €80,000 ceiling in the terms of the on-farm renewables fund, to facilitate maximum uptake of the on-farm renewables scheme.**
- **The Department of Housing, Planning and Local Government should review existing planning obligations for all on-farm renewable projects, to bring planning requirements in line with other EU Member States.**
- **The long-overdue renewable electricity support scheme must be announced by the Department of Communications, Climate Action and Environment, with a proportion of the scheme ring-fenced for community and farm scale projects.**

Crude protein in animal feed

The use of low-crude protein in animal feeds is recognised as an important tool to reducing ammonia emissions while maintaining nutritional needs of animals.⁵ This requires guidance and expertise from nutritionists and clarity of input content, when purchasing feeds.

IFA proposes that all merchants, millers and feed retailers should be required to list feedstuffs in their rations and the quantity of each per tonne. In addition, guidance should be given as to the economic and environmental savings when using lower crude protein rations.

IFA would welcome the opportunity to meet in the coming weeks to discuss this submission further.

⁴Houses of the Oireachtas (March 2019) *Report of the Joint Committee on Climate Action Climate Change: A Cross-Party Consensus for Action*

⁵ Pierce, K (2019). *Managing Crude Protein to Improve Performance*, Proceeding from Smart Farming 2019 Spring Seminar. Accessed online 20th June 2019 (<https://smartfarming.ie/wp-content/uploads/2019/05/Karina-Pierce-Managing-Crude-Protein-to-Improve-Performance.pdf>)