



**Opening Statement by IFA President Tim Cullinan
to the Joint Oireachtas Committee on Agriculture, Food and the Marine**

**on Water Quality Monitoring Report on Nitrogen and Phosphorus
concentrations in Irish waters 2022**

Wednesday, 19th July 2023

Chairman and Committee Members, I would like to thank you for inviting IFA to address you today.

I am joined by Shane Herlihy Hydrogologist and Environmental Consultant with ERS¹, Tadhg Buckley IFA Director of Policy and Aine O'Connell IFA Dairy Executive.

Both the environmental and economical sustainability of Irish agriculture is underpinned by our temperate climate which allows us to produce beef and dairy produce from pasture. 92% of all agricultural land in Ireland is grassland, compared with an EU average of 31%.

Our grass-based system is unique among Europe where livestock are typically reared indoors. Irish agriculture is dominated by small to medium-sized family farms, with an average farm size of 33 hectares. The average stocking rate (livestock units per hectare) in Ireland is 1.3 units per hectare (2.1 units per hectare for dairy herds) per hectare which is relatively low compared to other EU countries including the Netherlands (3.4 units), Malta (3.2 units) and Belgium (2.7 units).

In order to maximise the amount of pasture utilised in livestock production systems Ireland avails of a Nitrates derogation. The justification for having the derogation in Ireland is based on objective criteria, such as the long growing seasons, which ranges from 330 days per year in the south-west to around 250 days per year in the north-east, and the high yields of grass with high nitrogen uptake.

¹ Environmental Risk Solutions

The Commission's Implementing Decision of 29th April 2022 granting Ireland a derogation included the requirement to conduct a two-year review of water quality (2021 and 2022), to take place in 2023, to determine maximum stocking rate thresholds based on nitrates concentrations, eutrophic status and their respective trends – Article 12.

This condition was introduced without consultation with stakeholders and will have a significant economic impact on derogation farmers livelihoods and deliver negligible improvements to water quality.

The competitive advantage of grass-based systems is based on maximising grass utilisation. Where stocking rate is not sufficient relative to pasture growth potential on a farm, it will result in lower grass utilisation, lower sward quality and reduced animal performance.

The imposition of a lower organic N limit per ha could move farmers away from pasture-based systems to a higher input system (more bought in feed) in an attempt to maintain milk output from the farm.

Annex 1 of the EPA "Water Quality monitoring report on nitrogen and phosphorus concentrations in Irish Waters 2022" addresses Article 12 and upon the satisfaction of the Commission's assessment framework created "The Red Map".

IFA rightly called out the red map as nonsensical, which it is, This is not a criticism of the EPA, but a criticism of the framework requested by the Commission for categorising areas for a reduced stocking rate threshold. Those that have studied this rather than the headlines would understand that the Targeting Agricultural Maps is the preferred option of the EPA for targeted actions.

Since the publication of Article 12, IFA has consistently outlined the flaws associated with its measurement of water quality to determine stocking rate thresholds. Most notably:

1. An assessment of trends between two years is too short as it ignores the reality of lag times. Lag times refer to the delay between the time when a particular agricultural practice or activity occurs and the time when its impact on water quality is observed.

This delay is due to a range of factors, including the time it takes for nutrients to move through the soil and into the groundwater; the time it takes for groundwater to move through the aquifer; and the time it takes for monitoring data to be collected and analysed.

As a consequence, it can be difficult to attribute changes in water quality to specific agricultural practices or activities, as the effects of individual practices or activities accumulate over years or decades.

It is therefore not possible to make meaningful conclusions about national or regional trends based on a limited number of monitoring sites over a short-term period, of two or three years. These delays must be quantified in order to establish realistic deadlines, thresholds and policy expectations, and to design effective best management practices.

2. The Eutrophication status of a water body is impacted by a multitude of pressures and associated nutrients. Thereby improving its status is dependent on a variety of measures and not just simply a reduction in stocking rate. In addition, the Nitrates Directive itself requires the Eutrophic status of surface, estuary and coastal waters every four years, while the Commission decision insists that a comparison be made between 2021 and 2022. This is not consistent.
3. A reduced stocking rate threshold of 220kgN/ha will have a negligible impact on water quality. It is modelled by Teagasc to reduce nitrate loss to 1m soil depth by 2.2kg N/ha.

However, due to Ireland's heterogenous landscape, its contribution to catchments will be variable and inconsistent. While its benefit to water quality is questionable the economic impact of the reduction is guaranteed. IFA estimate that the loss to the rural economy will likely be €236m. However, the impact it will have on the impacted family farms will be much more devastating.

4. Given that our estuaries capture significantly large catchment areas and pressures, the use of their status to determine stocking rate thresholds is not valid, as it ignores the contribution of wastewater treatment plants and other pressures to declining water status.

27% of transitional water bodies (estuaries & coastal lagoons) are at risk of not achieving good status and are impacted equally by the combined effects of urban wastewater & runoff (40%) and agriculture (43%).

5. Over 30 measures have been included in the Nitrates Directive since 2018 which need to be given time to demonstrate improvements. Of critical importance, the introduction of banding and its impact on stocking rates was only introduced in 2023 and hence this very costly measure adopted by farmers is ignored within Article 12.

Recognising the seriousness of the issue, an IFA delegation met with the Nitrates Unit of the European Commission in February to outline our concerns relating to the details of Article 12.

Subsequently, IFA made a submission to the EU Commission which has been made available to this Committee for today's meeting as 'Appendix 1'.

In March, the Minister for Agriculture reflected on our concerns and informed the Seanad that he would be seeking further flexibility on Article 12. This flexibility needs to be obtained as a matter of urgency.

It is worthwhile to point out that in the past two months the Minister for Agriculture has put together an *Agriculture Water Quality Working Group* which he consistently refers to since its establishment. This Group is in its infancy with its fourth meeting held yesterday and it may well prove to be a useful vehicle in helping protect water quality in the medium-term. However, the current issue relating to a possible reduction to 220kg organic N is far too pressing and urgent to hand over to a working group just formed in the past six weeks.

The most recent National Farm Survey data reveals that the average dairy farmer (who is most affected by any changes to the derogation) has €127,477 of bank borrowings with 77% of this classed as medium to long term debt. This debt is typically present on younger farmers whose repayment capacity is based on the premise that a 250kg organic N limit is applicable. If a 220kgN/ha stocking rate threshold is introduced, it will likely place some of these farms in financial jeopardy. How could we agree to more costly measures when we find our farmers in this space?

In conclusion, farmers are very aware of their responsibility towards protecting water quality and have made significant investments on their farms to mitigate their pressure on local catchments. An assessment of water quality must be scientifically robust, fair and justified.

Article 12's assessment of water quality is not scientifically robust.

It is not fair or justified, yet it will have massive ramifications for the entire agricultural sector.

IFA is seeking an immediate resolution by Minister McConalogue to Article 12 and to explore alternative measures that can improve water quality without decimating farm families.

I will now hand you over to Shane Herlihy for his opening address.