

Dear Chair

IFA wish to make the following substantive observations on the latest Revised Food Vision Dairy Group Report issued on 23rd of May 2022. These observations are in addition to the three submissions IFA have previously submitted to the Food Vision Dairy Group.

Food Security

IFA wish to first highlight the changes in circumstances since the Food Vision report was published. With war in Ukraine and ever escalating agricultural input costs we are in a much-changed world. Food Security is now front and centre of world discussion and food scarcities in many regions is a very real prospect. We have to reiterate our questioning of the timing of this Food Vision Dairy Group, especially around proposals which are going to restrict production here in Ireland, one of the most efficient dairy producers from a greenhouse gas emissions perspective.

Full Economic Impact Study

From the outset we have outlined that a full economic impact assessment is required on these proposals before they are progressed. This remains our view - it appears reckless at this juncture to proceed without any proper impact assessment completed on proposals that may affect dairy farming in Ireland in such a fundamental manner.

Climate Act

As previously outlined, the Climate Action and Low Carbon (Amendment) Act 2021 (Climate Act) mandates the Government to give due regard to the impact of carbon leakage as a consequence of measures implemented by the State. Again, we have not been provided with any analysis on what these proposals may do in that regard. Furthermore, the legislation also references the unique properties of biogenic methane. Again though, no proper account of this has been reflected in the Food Vision interim report.

Response to Specific proposals

1. Proposal 1 to “*Consider a Voluntary Exit/Reduction Scheme*”- IFA are willing to engage further on the consideration of such a scheme, but strictly on the following basis;
 - Any scheme must be 100% publicly funded. No industry funding can be included as ultimately any contribution from Co-ops/Processors will come from farmers continuing in dairy farming.
 - There can be absolutely no restrictions on those farmers who do not avail of such a scheme or any new entrants to dairy farming. Those who wish to continue dairy farming or enter the industry cannot in any way be restricted as a result of the proposed scheme.
 - Other ruminant sectors should be fully consulted.
2. Proposal 2 “*Explore the potential of Cap-and-Trade emissions model*” - our position has not changed. IFA are completely opposed to this proposal which is a “quota by another name” and do not see the merit, or reasoning for further research on this topic. Proposal 3 “*Explore the possibility of measuring and monitoring carbon production at individual farm level*” will ultimately give a full picture of both emissions and removals on each farm so proposal 2, in our view is a pointless exercise.

3. Proposal 4 “*Reduce chemical N use in the dairy sector by 30% by 2030, with a reduction of 22% – 25% in the short term (2025). (This is a reduction from current approximate usage of 200k tonnes to 140k tonnes by 2030)*”. IFA, as previously stated, is supportive of realistic and measured reductions in the use of inorganic nitrogen by the dairy sector. However, this proposal is setting an unrealistic bar on what reductions can be implemented at farm level without seriously impacting farm profitability and food production.

Food Vision 2030 included a commitment by the farming sector to reduce the use of inorganic nitrogen by 20% by 2030. IFA view this target as ambitious but achievable if coupled with appropriate funding and support. IFA believes that the proposed reduction of 30% in inorganic nitrogen by 2030 included in the current draft interim report is unachievable by the sector within the timeframe outlined without massively impacting farm profitability and food security.

A 20% reduction in inorganic nitrogen, coupled with a switch to 100% Protected Urea, will achieve c. 90% of the emissions reduction targeted without putting in jeopardy both overall farm profitability and food production. Any proposed reduction beyond 20% can only be considered after a full economic impact assessment has been completed along with research in commercial farm settings across all land types which validate a reduction beyond 20% is achievable on a widespread basis.

President: Tim Cullinan Director General: Damian McDonald