

AIC Policy Report

April 2024



Working in support of
a modern, sustainable
commercial, agriculture

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Summary

- AIC has released its manifesto for the next UK General Election (1.1), detailing its top three priorities within it. The manifesto has been designed to clearly explain who AIC are, and our role in the supply chain. Work has already started on putting the manifesto into action (1.2, 7.4 & 8.3) as there has been a notable increase in political interest in food security since the beginning of the year. This has been reflected in numerous political debates on the subject (1.4), changes to SFI (1.7) and increased media interest (1.2), which AIC has been active in using our 2023 report to help inform this.
- Pulses UK (1.6) is a part of the AIC. This will allow pulse-related issues to be better amplified to political and wider external audiences and build on the existing work AIC undertakes in this area across all policy sectors.
- Major AIC policy work has focussed on the announcement that there will be a UK Carbon Border Adjustment Mechanism (CBAM) (6.5), with a consultation open until June. Work is ongoing with the UK's Forest Risk Commodities (2.1) legislation, with regular engagement with Defra, Members, and stakeholders such as farming unions as to its implementation. Lastly, precision breeding's final legislation set to be signed off later this year. All three issues have corresponding EU legislation that will have inevitable crossover and interaction with the UK, such as the treatment of NI based businesses, the trade in goods, and divergence on business obligations.

1. Cross Sector Policy

1.1 AIC Manifesto

Since the last policy report, AIC has drafted, designed and launched [its manifesto for the next UK General Election](#). In it, AIC has detailed the three top "asks" following Member engagement last year. These asks are:

1. A considered Government approach to UK food security and land use (using the AIC-commissioned "Powering Productivity for Sustainable Food Security" report); seeking to implement an independent, statutory UK Food Security Committee;
2. Addressing divergence in policy and technical standards between GB and the EU/NI and urging Government to seek an SPS/veterinary agreement with the EU and;
3. A consistent approach to sustainability reporting in the food supply chain.

The manifesto has been designed so that it explains very clearly who AIC Members are and their significance within the supply chain. With so many manifestos and policy asks being circulated to prospective candidates, many of whom will not be familiar with agriculture, it is vital that it is clear and makes good use of graphics. Finally, the manifesto has been produced with [AIC Scotland](#), [AIC Cymru \(English and Welsh\)](#) and [NIGTA/AIC versions](#), to ensure our coverage across the UK is relevant in devolved administrations.

1.2 Political Update

As part of an inquiry into "Fairness in the Food Supply Chain", on 19 March the Environment, Food and Rural Affairs (Efra) Committee heard evidence from AIC's Robert Sheasby and other trade bodies, as well as food processors and manufacturing businesses. MPs heard how improving the UK's long-term food security can help to ensure fairness in the supply chain and protect against the inflationary impacts of global market volatility. This was preceded by interviews the same morning with BBC 5 Live's Wake Up to Money Show and

BBC Radio 4's Today programme, covering the evidence session and AIC's priorities on food security and our 2023 report.

In March, AIC met with a number of Labour Party stakeholders to discuss a range of issues facing agriculture and the supply chain ahead of the General Election, likely to take place later in 2024. AIC not only met existing Labour staff and officials, but also a number of Labour Party Prospective Parliamentary Candidates in rural "target seats". AIC has followed up with these candidates and will be speaking to Members in their prospective constituencies about hosting a visit this year.

After nearly 40 years employed in MAFF and latterly Defra, the AIC said farewell to Tim Mordan, Director at Defra, who announced his retirement. AIC's policy work depends on the long-term relationships built with civil servants, who act as the vital link between politicians and the industry. With recent political turbulence and a churn of Defra Ministers and external challenges to the food supply system, Tim has been instrumental in maintaining the necessary continuity of the department's work and ensuring AIC concerns and advice are listened to.

1.3 Trade

In March, the Government confirmed the list of [commodities that will be subject to a suspension](#) in import duties, where they do not already qualify for a preferential rate of duty under an existing trade agreement. This follows an application phase in summer 2023 during which businesses could apply for a tariff suspension. A number of goods from across seed, animal feed and cereal sectors were included for suspension. Certain products that had been applied for, were not taken forward for a duty suspension, including UAN fertiliser. A full list of goods has been provided in a Member briefing.

The tariff-free trade of most goods - including grain - between the UK and Ukraine has been extended to 2029. The original trade agreement signed between the two countries in May 2022 was due to expire on 31 March 2024, but has now been extended by five years for almost all goods.

AIC met with the Department for Business and Trade (DBT) teams covering Latin America and the Caribbean (LATAC) in February. Considerable investment has taken place into staffing in UK embassies across the region, with services offered to AIC Member businesses such as introductions, insights, partnerships and market access challenges. Members with ongoing challenges or potential market access barriers should contact AIC who can facilitate to relevant contacts in DBT.

1.4 Food Security

In addition to the AIC Select Committee appearance (para 1.2), a number of parliamentary debates, questions and Select Committee reports on food security have taken place in Westminster, Holyrood and Cardiff since the last policy report. These reflect an overall escalation in concerns held by parliamentarians and reflects the work of AIC in promoting this up the wider agenda, as well as promoting to other influential stakeholders, farming groups and trade bodies. AIC has briefed many MPs and Peers on current supply chain challenges, as well as outlining our Powering Productivity Report from 2023, and it has been reassuring that contributions from parliamentarians have explicitly underlined the need for secure and sustainable food production in the UK as well as imported inputs.

1.5 Precision Breeding Act (Gene Editing)

Following the consultation on Precision Breeding that took place in January 2024, the FSA announced in March that they would be seeking to implement the proposals as drafted. This includes a Two-Tier approach to PB products, no mandatory PB labelling or additional requirements on businesses in the food or feed supply chain. It is now hoped that the secondary legislation will be laid before the summer recess, to ensure that it is on the statute book prior to the next election. Encouragingly, meetings with the opposition parties have also suggested that a potential change of Government would not seek to prevent the legislation from going ahead.

AIC sits on a Defra expert working group on Precision Breeding. Two sub-groups have been formed: one on Consumers and the other on Trade and the UK Internal Market; the latter is now chaired by AIC's Ed Barker.

1.6 Pulses UK join AIC

In March, it was confirmed that Pulses UK will become a part of the AIC, making for strong and united representation for businesses in the pulses sector. In early March, Pulses UK Members voted overwhelmingly in favour of a proposal for their trade body to join AIC. The AIC Board has now ratified this move and work to integrate Pulses UK is expected to conclude in the summer. The interests of Pulses UK Members will be well represented across the five policy sectors of AIC and will work across future policy reports.

1.7 Sustainable Farming Incentive (SFI) cap on options

In March, Defra announced that [the amount of land farmers in England can take out of food production under SFI will be capped](#), following concerns raised by AIC Members and others advising farmers on SFI applications. New applicants to the Sustainable Farming Incentive (SFI) scheme will only be able to put 25% of their land into six SFI actions that take land out of food production. AIC welcomed the move as a way of providing clarity for business, whilst demonstrating that the Government is listening to fears that environmental ambitions are being delivered at the expense of food security.

1.8 Sustainability Self-Assessment Framework and Introduction to Sustainability for the Agri-Supply Industry training

Numbers remain low for the Self-Assessment Framework and valuable feedback was gathered at the first Sustainability Liaison Group meeting since its launch. This has resulted in three areas to address: the process for accessing the framework, the structure of the framework and communications and uptake of training slightly higher numbers.

1.9 AIC Roadmap for a Sustainable Food Chain, 2024 Update

Feedback was sought on an update at Sustainability Liaison Group with a separate Roadmap Working Group set up with a representative from each sector. Further detail will be presented at Board meetings with the aim of publishing the update at AIC Conference 2024.

1.10 Food Data Transparency Partnership (FDTP)

The Eco-working group roadmap on moving towards consistent, accurate and accessible environmental reporting in the food system is likely to be published in May/June. The push for this to inform eco-labelling has been delayed with the focus on getting the data, methodology and reporting right first. AIC has been invited to join a new national technical committee by the British Standards Institute on Data-driven agrifood systems with the scope being "*Standardization in the field of big-picture, data-driven, principled-decision-making, multi-objective optimization of agricultural and food systems*".

1.11 Extended Producer Responsibility (EPR) for Packaging

New/amended packaging data reporting regulations are currently undergoing parliamentary processes across the UK to be in force for 1 April 2024. These will include an amended definition of household packaging in an attempt to ensure that business-only packaging that is not likely to be disposed of in a household bin will not be classified as household packaging. The new definition will form a two-stage test, with both parts needed to be satisfied for packaging to be classified as household packaging. [Recent guidance has been made available on GOV.UK](#) to assist businesses in deciding whether their packaging should be classed as household packaging or not.

2. Animal Feed

2.1 UK Forest Risk Commodity Regulation and EU Deforestation Regulation

AIC has had significant engagement with Defra teams working on the UK Forest Risk Commodity (FRC) Regulation. We understand that despite requests from some parts of the UK supply chain, Defra has reaffirmed that they will not be looking to align FRC Regulations with EU Deforestation Regulation. We understand the laying date for the UK FRC Statutory Instrument will be by the end of April 2024.

Defra was suggesting a three-month period for the Regulation to come into force which AIC feels is ambitious. Defra has indicated “at least” six months transition period, though this might be longer. Given the above, the earliest effective date for the implementation of the Regulation would be the end of January 2025. Defra has committed to providing comprehensive guidance on the type and scope of evidence that businesses in scope will be expected to provide in their annual compliance reports.

EU Deforestation Regulation (EUDR) was the subject of a discussion at a Commission AGRIFISH meeting held on 26 March. The Austrian delegation presented a paper highlighting:

- 1) Conflict of interest between the EUDR and the promotion of extensive farming practices/an increase in organic farming in the EU. There is also a contradiction with the EU protein initiative;
- 2) Instrument for the identification/registration of cattle: the EUDR calls for the introduction of a parallel system, multiplying the administrative burden;
- 3) The EU information system is impractical and a second pilot phase is needed.

The supporting Member States therefore call for a rapid revision of the EUDR:

- 1) Extension of the implementation period;
- 2) Reduce the administrative burden;
- 3) General exemption for producers of relevant commodities in low-risk countries;
- 4) In general: reduce the number of certificates in the EU.

The Agri Ministers requested the Commission look at how to mitigate the undesired effects of EUDR.

2.2 FSA Board endorsement of two Regulated Products reform proposals

At its March meeting, the FSA Board supported two proposals for legislative reform which will help streamline the authorisation process for regulated products which include feed additives. The FSA Board had agreed in 2023 that the FSA would develop plans to improve the current system to ensure consumers have quicker access to a wider choice of safe, innovative products. The current authorisation process was inherited from the EU and the FSA Board agreed that significant change would be necessary to achieve a high-quality service that can keep up with the pace of innovation in the food and feed industry.

The first proposal is the removal of the requirement that some products previously authorised as safe must go through a reauthorisation process periodically, and the second proposal supported by the Board is a proposed change to allow authorisations to come into force via an official register, rather than by secondary legislation. AIC is of the view that both should help speed up the approval process.

Whilst welcoming this announcement, AIC remains concerned at the slow progress of approvals for the 177 feed additives already submitted for authorisation and will continue to discuss with the FSA opportunities to help bring these products to market in a more expedient manner.

2.3 Concerns over the UK and EU reliance on a single source for certain strategically important feed additives

At recent AIC feed sector committee meetings Members have expressed concern that the industry is becoming worryingly reliant on China for groups of vitamins and amino acids. It is clear that large scale fermentation processing has been offshored to China and other non-European origins given the cost of energy (up to 30% of production costs) and sugar (up to 50% of production costs) in Europe. The chart below sets out the EU picture and is also a fair reflection of the situation in the UK:

Inputs used in animal feed	Share of European production vs. world production	Share of Chinese production vs. world production	European self-sufficiency	Level of risk
Vitamin B7 (biotin)	0	100%	0%	Very high
Vitamin B9 (folic acid)	0	100%	0%	Very high
Vitamin B6 (pyridoxine)	0	100%	0%	Very high
Vitamin B12 (cyanocobalamin)	17%	83%	20%	High
Vitamin D3 (cholecalciferol)	18%	80%	25%	High
Vitamin B1 (thiamine)	23%	77%	30%	High
Vitamin B5 (pantothenic acid)	21%	79%	50%	High
Vitamin C (ascorbic acid)	23%	77%	20%	High
Vitamin K3 (menadione)	0%	100%	0%	Very high
Amino acid: lysine	2%	70%	10%	High
Amino acid: threonine	0%	98%	0%	Very high

3. Arable Marketing

3.1 AHDB rebate review on levy collectors

On publication of consultation results in May 2023, Defra confirmed its decision that the levy deduction provisions should be retained but amended to be consistent and more flexible in future. Legislative changes to this effect were subsequently proposed by Defra and agreed by Parliament with the new legislation coming into force in late September 2023. This means that the 5% commission rate is no longer fixed and, for cereals and oilseeds, AHDB can amend the rate. AIC is consulting Members who collect levies for third parties on this subject, asking for information to support a response on their behalf. This will include examples which demonstrate the costs incurred so that this can be used to help inform an AHDB Sector Council decision on a suitable future levy deduction rate.

3.2 AHDB levy fee increase

Increases to the AHDB levy have been given the go ahead by Government ministers and will take effect from April 2024. New rates have been provided to all levy payers. It follows feedback from the AIC and its levy-paying Members during last year's consultation, engaging in the AHDB's industry-wide consultation on raising fees. The AHDB state increased levies will allow it to deliver more services, including more independent research for cereals and oilseeds. The Government also agreed that Nicholas Saphir will serve a further 12 months as Chair of AHDB.

3.3 Wheat import descriptions

AIC has been contacted by Government trade teams over UK imports of wheat, with a view to possible amendments to EU retained law and definitions of “high quality wheat” as laid out in the UK’s tariff schedule. Upon EU Exit, the UK transposed EU law and descriptions for cereals, to meet consistency with the EU. Like the EU, the UK has a tariff in place for medium quality wheat, and none on high quality wheat. How these are described ensures a product falls within the correct tariff code. It has come to the attention of the Government that there is however a slight discrepancy between the UK and EU approach in describing high quality wheat, with the UK having two additional indicators compared with the EU. AIC is working with government on consistency with the EU regarding these descriptions.

4. Seeds

4.1 Spring seed availability

AIC was made aware of concern among MPs regarding spring seed availability in January. With Member support, clarity was provided to Ministers and the media that the sector would be able to meet the exceptional demand seen this season. Minister Mark Spencer MP responded to written questions from the Chair of the Efra Select Committee, Sir Robert Goodwill MP, who asked for an assessment of the supply of spring barley seed, whether an issue exists, and if legislation to enable the temporary trading of farm-to-farm seed should be considered. This was echoed by some farming representatives. AIC made clear that amending the law is not necessary and such a move would have damaging long-term consequences for farmers and the certified seed sector alike. In addition, AIC assurances that spring seed would be available after processing, proved to be the case.

4.2 Border Target Operating Model

The Border Target Operating Model (BTOM) continues a phased approach of biosecurity controls to the import regime of plants and plant products moving from the EU, Switzerland and Liechtenstein to Great Britain. The first phase of BTOM import controls came into force on 31 January 2024, and the next date when new controls will be implemented is 30 April 2024. From this date, high-risk plants and plant products must come through a Border Control Post (BCP) or Control Point (CP) where identity and physical checks will be carried out.

Checks will no longer take place at Places of Destination (PoDs). Alongside this, documentary checks and physical and identity checks at the border will be introduced for medium-risk goods imported from the EU. In line with the reduced frequency of checks, checks will have a baseline of 3% for EU imports and 5% for non-EU imports, but may be different in specific cases, where additional risk factors apply.

4.3 Spring seed derogations

A derogation for spring oats and vetch seed has been granted by the Animal and Plant Health Agency (APHA) to support supply this season. The result follows concerns expressed to AIC by some Member businesses over the germination of seed, potentially leading to difficulties in meeting market demand this season. AIC asked Members to submit varieties, results, and evidence to support the case for seed derogation before making a formal application to Defra. Derogation letters were sent in March.

5. Crop Protection and Agronomy

5.1 National Action Plan delay

There is no definite date as to when the revised National Action Plan (for the Sustainable Use of Pesticides) will be published. It was close to publication towards the end of 2023, however the newly appointed Secretary of State, Steve Barclay wanted to review the Plan before publication. With the restoration of the Northern Ireland Assembly in February 2024, AIC understands that the Minister for Agriculture, Environment and Rural Affairs, Andrew Muir is reading the NAP before it is published. Stakeholders are keen for the revised document to be published so implementation of the various aims can progress.

5.2 Grassland IPM infographic in development

AIC has started work on developing an infographic to help farmers, agronomists and policymakers understand the various integrated pest management measures that are relevant to grassland. This follows on from the development of two separate IPM infographics, one for arable and one for horticulture published by AIC. It is hoped that the grassland infographic will be available in spring 2024.

5.3 Parallel trade permit reinstatements

Parallel traders who held a valid permit on 31 December 2022 were given the ability to apply for reinstatement of the permit up to 1 April 2024. At the time of writing, 20 permits have been reinstated according to the CRD website. Defra met with AIC to understand at the end of the use of reinstated parallel product period which sectors would be most impacted and historically where parallel imports may have helped to meet demand. Discussions continue to find a solution to address the concerns of industry stakeholders.

6. Fertilisers

6.1 Urea

The deadline for the mandatory inclusion of inhibitors in urea fertilisers applied to crops came into effect on 1 April 2024, and farmers are now expected to only use urea fertiliser with inhibitors until the end of the year when uninhibited products can once again be used as the risk of ammonia emissions is abated by colder wetter weather. Red Tractor will be monitoring farmer compliance with the scheme and reporting back to Defra who are closely following the voluntary implementation with interest. Whilst the threat of legislation continues if the scheme is unsuccessful, it is tactically impossible to implement a legislative approach without a new fertiliser regulation in place enforcing legal standards and definitions for the performance and definition of inhibitors, excepting an outright ban on urea. Although this was Defra's preferred choice at the outset, subsequent domestic gas costs and the conflict in Ukraine have rendered European and domestic fertiliser stocks scarce and made the reliance on imported urea essential.

6.2 Production

Gas has largely been replaced by ammonia feedstocks by the major nitrogen fertiliser manufacturers in both the UK and EU. It remains to see if the introduction of CBAM (see 6.5) changes this development back in favour of domestic gas-powered production.

6.3 Regulation

The Consultation on a new Fertilising Products Regulation is still awaited. AIC understands the delay is due to the Secretary of State prioritising items that are likely to contribute towards the cost-of-living crisis in preference to other initiatives within the department. The Sector Working group formed to respond to the consultation when it occurs will be holding an informal preparatory meeting with Defra officials after Easter.

6.4 Trade

The recent volatility of fertiliser prices has significantly affected domestic deliveries to farm and shrunk the market by nearly a quarter, most noticeably in deliveries to grassland. There is also significant consolidation in the market with new entrants operating outside AIC picking up importing and blending responsibilities for members who are reverting to distribution only.

6.5 Carbon Border Adjustment Mechanism (CBAM)

UK Government intends to introduce a Carbon Border Adjustment Mechanism in 2027 to reduce the risk of “Carbon leakage”, to follow one year behind the EU. It will be a stand-alone scheme based on ETS values and methodology but will not follow the European model of certificated carbon trading.

All items currently scheduled under UK ETS will be in scope. This includes Nitrogenous fertilisers and their precursors, hydrogen and ammonia, as their inclusion is intended to encourage national and international markets for carbon emission reduction and avoidance.

CBAM charges would therefore be a function of the embedded carbon in the production of the product, including all Scope 1 and 2 emissions and the UK carbon cost (currently £35/ tonne), less any adjustment for any existing carbon taxes already paid in any third country of origin, and subject to a Carbon Price Support CPS charge linked to the cost of domestically produced electricity (as yet unknown).

A wholly non-compliant urea fertiliser might be expected to incur an additional cost at the border of not less than £35 per tonne based on today’s carbon price plus any additional CPS costs. The Sector is working with stakeholder economists to model the potential impact on farm costs and will be having direct talks with HM Treasury shortly to explore implications in detail. UK CBAM differs considerably from that of our major trading partner for fertiliser (the EU) in its mechanics, and also implementation. The EU will be introducing their CBAM a year earlier but tapering the full impact at a rate of 10% increments over 10 years.

7. AIC Scotland

7.1 Agricultural Policy

The ARC Bill (Agriculture & Rural Communities (Scotland)) Bill has completed stage 1 of the legislative process in the Scottish Parliament. The Rural Affairs Committee has published a detailed report of its findings and recommendations this can be found at [Stage 1 Report on the Agriculture and Rural Communities \(Scotland\) Bill](#). The Committee agreed with the framework approach. The secondary legislation is scheduled to be laid before Parliament in 2025. This will include the proposed five-year rural support plan which will detail specific support schemes and spending priorities. The Committee noted the strong need for robust consultation and co-design of secondary legislation. One of the four objectives of the Bill is the “adoption and use of sustainable and regenerative agricultural practices”. At this stage there are no proposals to specifically define what is meant by sustainable and regenerative given its ambiguous meaning.

7.2 Net Zero

AIC Scotland met with the Scotch Whisky Association to engage as they develop a net zero/sustainable cereals strategy for the industry. Given that many of the larger SWA members have plans in place, this is more focused on smaller members and will act as a roadmap as to how to reduce Scope 3 emissions specifically. This workstream is at a very early stage and the aim being to co-design a list of measures which could be adopted

at farm level. AIC will be working with SWA to ensure that where possible any proposals do not create unintended consequences across the supply chain.

7.3 Precision Breeding

Food Standards Scotland is developing advice and a future policy options paper which will be put to its Board members in summer 2024. FSS recognises that the current regulatory regime has not kept pace with new science and technological advances. This workstream will include take into account the views of stakeholders to help consider how to approach developments in new genetic technologies. Scottish ministers have not yet reached any conclusions nor made any decisions in relation to GE. Separately, the Office for the Internal Market, part of the Competition and Markets Authority, has used PB as a Case Study in understanding the possible divergence issues in place intra-UK.

7.4 Political Engagement

AIC Scotland continues to be involved with the FAST umbrella group, as part of this we are holding a parliamentary reception to highlight the economic importance to the agri-food supply chain to the Scottish economy. The event will be hosted by Kate Forbes MSP featuring a range of influential speakers. Invitations to AIC Scotland Members to attend will be sent out. The event is scheduled for 22 May 2024.

With a General Election likely to be held this year, the key focus of political activity will be on influencing political party manifesto (1.1) commitments and reaching out to prospective parliamentary candidates.

In March, AIC also recently gave evidence to the Scottish Parliament's Constitution, Europe, External Affairs & Culture Committee. The Committee has been holding an inquiry into the impacts of the EU-UK Trade Cooperation Agreement on business and trade. This provided an excellent opportunity to help MSPs understand the practical implications for business. AIC's Ed Barker provided evidence alongside NFUS and QMS, and two weeks later as part of a business focus, two AIC Scotland Members (Paddy Jack of DLF seeds and Margaret Carlin of Cefetra) also appeared before the same Committee.

8.1 Development of AIC Cymru

Notable activities this quarter have revolved around the Sustainable Farming Scheme. This has seen high profile farmer and stakeholder objections, with the Welsh Government's own economic impact assessment revealing significant negative impacts on rural jobs, livestock numbers and a reduction in agricultural sector businesses to the value of £199 million. AIC Cymru has been active in voicing its objections. This culminated in a face-to-face meeting with Mark Alexander, Deputy Director, Land Reform, in Cardiff with industry leaders providing a very clear and calm assessment as to the wider supply chain negative business and job impacts. An AIC Cymru consultation response was submitted prior to the March 7 deadline and was used by many member businesses to then submit their own business responses.

8.2 Wales Future Policy

The new First Minister Vaughan Gething was announced on the 16 March. Unsurprisingly, a new ministerial team was announced shortly after. Huw Irranca-Davies takes on the combined role of Rural Affairs and Climate Change. It is hoped that following the changes and realisation of the policy impacts that meaningful changes to the policy can be found. AIC Cymru and farming unions want to see the establishment of a small, focussed stakeholder group tasked with discussing and proposing changes to the scheme through genuine co-design.

8.3 Election manifesto

As outlined in (1.1), an AIC Cymru version of the General Election manifesto has been generated and will be used to help inform lobbying activity, especially with future events such as the Royal Welsh Show. The AIC Cymru manifesto has been made available in English and Welsh.

9. Northern Ireland

9.1 Ammonia

A KPMG Ammonia Report commissioned by stakeholders has been published. It estimated that the lack of planning permission being granted will have significant impact on farm businesses and profitability. Under the DAERA proposals, industry has indicated that there would be a fall-off in farm level activity and turnover if a farm/farm business cannot secure planning approval.

9.2 Carbon

The Carbon Farming Partnership is the new name for the Carbon Steering Group. The business case approved was partly dependent on Agrecalc being the supplier of choice. Agrecalc, however, were unable to audit every farm rather than typical farms for each sector to provide real information on which to base management decisions. The group has decided that the decision on the supplier for the carbon calculator will have to go to tender, with the final selection to be confirmed in May. By the time all the staff necessary are trained, it will be January 2025 before data can begin to be gathered and 18 months before the first round of data collection is completed from those farms in scope.

At the end of February, CAFRE ran a conference for dairy farmers entitled The Carbon Challenge. NIGTA provided a key speaker in Jim Uprichard who was able to project a positive message in carbon reduction potential by simple management changes such as targeting first calving earlier, looking after cows to get an extra lactation, improving forage quality, and balancing that forage more accurately by ensuring protein is not over-supplied.

9.3 Footnote on MRLs

NIGTA continues to have concerns over the European Commission seeking to possibly remove footnote pesticide MRL exemption for feed materials, without a proposal to have anything else in place. NIGTA and AIC will continue to work with EU Associations and ensure that members are kept informed.

9.4 EU Deforestation Regulation and UK Due Diligence legislation

There continues to be little clarity as to which deforestation schemes will be applicable in NI, and who will be the competent authority be. NIGTA has written to the Secretary of State, Steve Barclay to seek clarity. The two schemes are not strictly compatible and the commodities in scope do not align completely. AIC and NIGTA are continuing to work with both EU and UK Government representatives to understand the implications of both pieces of legislation for NI based businesses and wider stakeholders.

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