Public Consultation on the

Nutrients Action Programme 2027-2030

Department of
Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

An Roinn
Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

Depairtment o'
Fairmin, Environment an' Kintra Matthers

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As Minister I am incredibly proud of our farmers and their commitment across Northern Ireland to our environment. I have witnessed first hand the invaluable work being done for the benefit of nature, supported by the Sustainable Agriculture Programme (SAP).

Farmers have made huge strides to improve water quality since the introduction of the first Nitrates Action Programme (NAP) in 2007 and our agricultural sector continues to work hard to address the environmental challenges we all face.

Our water, air and natural habitats are the foundation of our society and vital to the long-term resilience of not just farming, but all our communities.

Whilst we should all recognise the progress that is being made, the ongoing crisis at Lough Neagh and many of our rivers, lakes and loughs demands further action. Excess nutrients are a key contributor to poor water quality and, we must deal with all sources if we are to turn the tide.

The NAP provides the framework for how nutrients such as nitrogen and phosphorus are managed on farms, helping to reduce pollution risks while supporting efficient nutrient use and farm productivity. The proposals set out in this consultation have been informed by a strong evidence base and by extensive stakeholder engagement.

I would like to express my utmost appreciation and deep gratitude to the NAP Stakeholder Task and Finish Group for their time, expertise and constructive approach, not least the external facilitator Karen Brosnan.

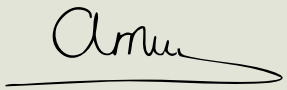
The Group's representatives from farming, the agri-food industry, and environmental organisations have been instrumental in shaping these proposals, ensuring that they are practical, informed by on-the-ground experience and focused on delivering meaningful environmental outcomes.

I genuinely appreciate the significant journey of change being travelled by agri-food and would like to express my admiration for our farmers, who time and again are rising to the challenge with so many already taking positive steps to manage nutrients more efficiently and to protect the environment.

The revised NAP represents an opportunity to build on this work and make significant improvements to our water quality and ensure farm businesses see the benefits of efficiencies. As Minister, I am committed to supporting investment through SAP for the benefits of farmers and the environment alike.

We must continue to work in partnership, and in that spirit, I encourage all interested stakeholders to consider the proposals carefully and to provide their views. Your feedback will help to ensure that the final NAP is robust and capable of delivering the standard of water quality all of us deserve, whilst securing a thriving, resilient and environmentally sustainable future for agri-food.

I look forward to considering your responses.



Andrew Muir MLA
Minister of Agriculture, Environment and Rural Affairs

Executive Summary

Executive Summary

The Department of Agriculture, Environment and Rural Affairs (DAERA) is consulting on proposals for a revised Nutrients Action Programme (NAP) for Northern Ireland (NI). The revised NAP will replace the 2019 regulations and is intended to apply from 2027 to 2030.

Since its introduction in 2007, the NAP has been reviewed and updated to reflect the best available evidence and to improve how nutrients are managed. The revised NAP for 2027-2030 represents an important stage within a longer journey of improvement, building on previous measures and setting a direction for continued progress.

Water quality in NI remains under pressure. Monitoring data shows that many rivers, lakes and coastal waters are impacted by excess nutrients, particularly phosphorus and nitrogen. While agriculture is a significant source, other sources such as wastewater, septic tanks and urban drainage also contribute. Although some improvements have been achieved, recent evidence highlights ongoing and, in some cases, increasing pressures, demonstrating that further action is required.

Poor water quality has a wide range of impacts beyond the environment. It can increase costs for water treatment, affect businesses that rely on clean water, and reduce opportunities for recreation and tourism. It can also have implications for local communities and public health. Improving water quality is therefore important for supporting economic resilience and social wellbeing as well as environmental protection and sustainability.

Whilst there are other sources of nutrient pollution, the NAP is designed to protect water from nutrient pollution arising from agricultural sources by promoting the efficient and responsible use of livestock manures, chemical fertilisers and other nutrients applied to land.

DAERA acknowledges the significant efforts already made across agriculture, industry and other sectors to improve environmental outcomes. The proposed measures in this consultation build on this progress and have been developed through a NAP Stakeholder Task and Finish Group which was established in October 2025 and included senior representatives from the farming sector, the agri-food industry and environmental organisations.

DAERA recognises that the proposals also need to be considered in the context of wider economic pressures facing the farming sector and rural communities, including input costs, market conditions and the need to maintain viable businesses. DAERA recognises that there may be concern about the pace and scale of change, and that different farms face different constraints in how they can respond.

Improving water quality is a long-term process and requires willingness and coordinated action across multiple sectors. The proposals set out in this consultation build on existing measures, are informed by science and evidence and are intended to support wider work already underway across government and industry to address these pressures.

The revised NAP should also be seen in the context of wider action already underway to improve water quality in Northern Ireland. While the NAP focuses on the regulatory framework for nutrient management from agricultural sources, it forms part of a broader package of measures

including catchment-based delivery, advisory support, financial assistance, scientific research, monitoring, data and modelling. This wider approach is intended to support implementation in practice, target action where risks are greatest, and strengthen the evidence base for future policy development.

The proposed measures are intended to provide a practical and deliverable approach to improving water quality by reducing nutrient pollution over time. They are based on the best available evidence and have been developed through structured engagement with stakeholders across farming, the agri-food sector and environmental organisations. The proposals aim to support implementation in practice, not just set regulatory requirements, recognising the central role of farmers and land managers in delivering change. They also acknowledge that improving water quality will require coordinated action across multiple sectors. Ongoing transparency, monitoring and stakeholder engagement will be important to ensure the Programme continues to evolve and deliver effective outcomes over the longer term. The measures are grouped into key areas, including nutrient management, manure storage and application, farming practices, the use of technology, voluntary actions, technical amendments and implementation arrangements. Together, they are intended to improve nutrient efficiency, reduce losses to water and air, and support a fair, practical and proportionate approach to nutrient management.

The revised NAP introduces updated approaches to managing nitrogen and phosphorus, a stronger focus on data and evidence, and a greater emphasis on nutrient efficiency. It also includes a phased and, where appropriate, tiered approach to implementation to allow time for farms to adapt. The proposals are designed to be targeted towards higher-risk areas and flexible enough to apply across a range of farm systems. There is increased emphasis on transparency, record keeping and the use of technology to support compliance and decision-making.

DAERA recognises that effective implementation will require appropriate support for farmers. A significant level of support is available, including access to clear guidance, training, advisory services and, where available, financial support to help manage costs and support practical adoption.

The NAP Stakeholder Task and Finish Group have designed the proposals to be practical and proportionate, supporting delivery at farm level while contributing to the protection and improvement of water quality. They aim to strike a balance between the need to improve environmental outcomes and the need to support a sustainable and productive farming sector.

The NAP is expected to contribute to improved water quality by reducing nutrient losses to rivers, lakes and coastal waters, while also improving nutrient use on farms. It will support wider environmental objectives, including improved soil health, biodiversity, and progress towards air quality and climate targets.

Improvements in water quality are likely to occur gradually, as nutrients can build up in soils over time. However, the proposals set out a clear direction for sustained progress over the longer term.

DAERA is committed to ongoing engagement, clear communication and partnership working to support the implementation of the revised NAP.

By working together, there is an opportunity to deliver improved water quality, a healthier environment and a sustainable future for agriculture in NI.

Part 1 - Introduction - Purpose of this consultation

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1.1 Purpose of this Consultation

The Nitrates Action Programme was first introduced in 2007. It has been reviewed and updated several times since then, most recently in 2019.

The Department of Agriculture, Environment and Rural Affairs (DAERA) is now consulting on proposals for a revised Nutrients Action Programme (NAP). This programme will replace the current 2019 NAP and will apply from 2027 to 2030.

These proposals have been developed in a co-design process through the NAP Stakeholder Task and Finish Group (NAPSTFG), with farming, industry and environmental stakeholders. This consultation gives the public an opportunity to review the proposals and share their views before they are finalised.

This consultation forms part of an ongoing process. It provides an opportunity for stakeholders and the public to review the revised proposals in full, understand the evidence and rationale behind them, and provide feedback to help inform final decisions.

1.2 What this consultation is about

This consultation sets out proposals for a revised NAP that aims to:

- Improve water quality by reducing nutrient pollution
- Provide a practical and deliverable approach to change
- Support farmers and the wider agri-food sector
- Be based on evidence and shaped through stakeholder engagement
- Contribute to longer-term environmental improvement.

The consultation also provides an opportunity for these proposals to be reviewed, challenged and refined before final decisions are taken.

This consultation document is set out in six parts:

Part 1 - Introduction

- Explains why DAERA is consulting and how to respond.

Part 2 - Water Quality in Northern Ireland and the Nutrients Action Programme

- Provides details on water quality, legal framework, NAP review process including stakeholder engagement.

Part 3 - Support through Advice and Funding to Deliver Change

- Provides details of available support for advice and guidance and funding streams.

Part 4 - Proposed Measures

- Provides details of the new proposals for the revised NAP 2027-2030, along with a section on additional actions that farmers may wish to consider.

Part 5 - Governance - Monitoring & Review

- Provides details on how the implementation of the NAP Regulations will be monitored and reviewed.

Part 6 - Impact Assessments

- Provides details on the assessments carried out to support the proposals.

Part 7 - Supporting Documents

- Provides a list of the supporting documents such as impact assessments and scientific papers that underpin the proposals.

Have your say

DAERA is seeking views on the proposals set out in this document. All responses are welcome and will help to inform the future direction of the NAP. Alternative views are also welcome, particularly where they are supported by evidence.

1.3 How to respond

A copy of the consultation is available on DAERA Website at:

- https://www.daera-ni.gov.uk/consultations/public-consultation-proposed-nutrients-action-programme-2027-2030

You can respond to this consultation in one of the following ways:

- Online at Citizen space: https://consultations2.nidirect.gov.uk/daera/nutrients-action-programme-consultation-2026

  You can save and return to your responses while the consultation is still open.

- By email. Please send your response to: NutrientsActionProgramme@daera-ni.gov.uk

- You can also respond in writing. Please send your response to:

  Nutrients Action Programme Review
  Environmental Farming Branch
  Clare House
  1st Floor West
  303 Airport Road West
  Sydenham Intake
  Belfast
  BT3 9ED

To request a hard copy of the consultation papers, please email the address above.

When responding, please state whether you are doing so as an individual or representing the views of an organisation. If you are responding on behalf of an organisation, please make it clear who the organisation represents, and where applicable, how the views of its members were assembled.

Timing and duration of this consultation

- This consultation opens on **29 June 2026** and will run for **10 weeks**.
- The consultation closes at **11:59pm** on **7 September 2026**. Responses received after this time may not be considered.

1.4 Confidentiality

The Freedom of Information Act 2000 gives the public a right of access to any information held by a public authority, DAERA in this case. This includes information provided in response to this consultation. DAERA will publish a synopsis of responses to the consultation. This will include a list of names of organisations that responded but not personal names, addresses or other contact details.

DAERA cannot automatically consider information supplied to it in response to a consultation, to be confidential. However, it does have a responsibility to decide whether any information provided by you in response to a consultation, including information about your identity, should be made public or treated as confidential. If you do not wish information about your identity to be made public, please include an explanation in your response. Please be aware that confidentiality cannot be guaranteed, except in very particular circumstances.

Please note, if your computer automatically includes a confidentiality disclaimer, it won't count as a confidentiality request. Should you respond in an individual capacity, DAERA will process your personal data in accordance with Section 8 (e) of the Data Protection Act 1998 which permits processing of personal data when necessary for an activity that supports or promotes democratic engagement. Information provided by respondents to this consultation exercise will be held and used for the purposes of the administration of this current exercise and subsequently disposed of in accordance with the provisions of the Data Protection Act 2018 and General Data Protection Regulation. For further information about confidentiality of responses please contact the Information Commissioner's Office. See its website at https://ico.org.uk/

Part 2 - Water Quality in NI and the Nutrients Action Programme

Part 2 - Water Quality in Northern Ireland and the Nutrients Action Programme

2.1 Why water quality matters

Our water environment is essential for everyday life and supports a wide range of benefits, including:

- Clean drinking water
- Agriculture, fishing, aquaculture and food production
- Wildlife and biodiversity
- Recreation, tourism and local economies.

Poor water quality can cause problems for farmers, impact nature, increase water treatment costs, and affect communities and businesses across NI that depend on clean water. It can also reduce opportunities for recreation and tourism and may affect public health. Improving water quality is therefore important not only for the environment, but also for economic resilience and social wellbeing. Protecting and improving water quality is not just a statutory requirement - it is in everyone's interest. It helps protect a shared natural resource that we all rely on, now and in the future, and supports long-term environmental, social and economic wellbeing.

Water quality in NI is under increasing pressure, and many of our rivers, lakes and coastal waters are not in a healthy condition. The 2024 water classification update indicates an overall deterioration in surface waterbody status since 2021, with only 29 % of all surface water bodies achieving good or better ecological status compared to 31 % in 2021[1].

Under the Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017, there is a statutory requirement to protect and improve the water environment and to achieve at least "good ecological and chemical status" for all water bodies, subject to defined exemptions and extended deadlines. Current trends highlight the scale of the challenge in meeting these obligations.

Protecting Water Quality - a Shared Responsibility

Improving water quality will require sustained and coordinated action over time, including contributions from multiple sectors. While agriculture has a significant role to play, it is part of a wider system where collective action is needed to deliver lasting improvements.

Other activities and sectors also contribute to pressures on rivers, lakes and coastal waters.

These include:

- Wastewater from homes, businesses and industry
- Septic tanks and small treatment systems, particularly in rural areas
- Urban drainage and wider infrastructure.

Addressing these pressures requires coordinated action. Work is already

1 Water Classification Statistics Report 2024 Published February 2025 NIEA - WMU - ICP - NI Water Classification Statistics Report 2024.pdf

underway across government to reduce pollution from these sources, and these are delivered through separate laws and programmes, led by the other departments responsible for each area and delivery bodies.

The Minister outlined to the Assembly on 3 March 2026 a number of key interventions to strengthen the regulation and enforcement of wastewater activities and to reduce pollution across our water environment including:

- NIEA withdrawing from the 2007 Statement of Regulatory Principles and Intent (SORPI) administrative arrangement with Northern Ireland Water, which currently constrains the Department's ability to take enforcement action in relation to wastewater pollution
- Identifying Inner Belfast Lough designated Shellfish Water Protected Area (SWPA) as a sensitive area under the Urban Waste Water Treatment Regulations (Northern Ireland)
- Reviewing standards and putting in place new ones for discharge consents
- Improving the monitoring and reporting of Northern Ireland Water's activities

The work in relation to this range of actions continues.

The Lough Neagh Report[2] provides an example of coordinated work across different sectors to tackle nutrient pollution by bringing together those responsible for agriculture, the environment and water management. It focuses on taking practical actions, sharing information and targeting improvements where they are most needed.

Within this wider context, the NAP should be understood as one part of a broader package of action to improve water quality in NI. It provides the principal regulatory framework for managing nutrient losses from agricultural sources, but it does not operate in isolation. It sits alongside wider policy and delivery measures including catchment-based initiatives such as the Sustainable Catchment Programme, advisory and knowledge transfer support, financial assistance for on-farm change, and ongoing investment in scientific research, monitoring, data and modelling. Together, these measures are intended to support practical implementation, target action where risks are greatest, and contribute to longer-term improvements in water quality.

The NAP will support and build on this work by:

- Aligning with actions already underway
- Reinforcing a shared approach to managing nutrients
- Helping to deliver long-term improvements in water quality across the catchment.
- Operating alongside wider catchment-based, advisory, financial and evidence-led measures to support implementation and long-term improvement.

2 The Lough Neagh Report https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Lough%20Neagh%20Report%20and%20Action%20Plan.pdf

Aim of the Nutrients Action Programme

The NAP is designed to protect water against nutrient pollution from agricultural sources. Its main aim is to promote the careful and efficient use of:

- Livestock manures
- Chemical (manufactured) fertilisers
- Other materials that contain nutrients and are spread on land.

By improving nutrient management, the NAP seeks to:

- Reduce nutrient losses to water bodies
- Support compliance with River Basin Management Plan (RBMP) objectives
- Promote a more sustainable and productive agricultural sector.

The Office for Environmental Protection - its Role

The Office for Environmental Protection (OEP) has an important role in making sure environmental law is followed. It also checks whether DAERA is meeting its environmental duties.

The OEP can investigate concerns and make recommendations. This work supports the protection of NI's environment and helps progress towards agreed environmental goals.

Findings from the OEP Report on the NAP

On 30 April 2026 the OEP published a report titled "Review of implementation of the Nutrient Action Programme Regulations (2019) in Northern Ireland"[3]. The OEP recognises that improvements have been made since nutrient regulations were first introduced in 2007.

Over time:

- Farmers have adjusted their practices
- Changes have reflected new policies, agri-food industry requirements, and consumer expectations.

This shows that the sector can and does respond to change. Despite this progress, the OEP finds that further action is needed. The report makes 12 recommendations for positive change to build on progress already made. The recommendations focus on improving implementation, ensuring the rules are sufficient and achieving the goal of clean water.

Working Together to Improve Water Quality

Protecting and improving water quality requires a joined-up government, cross-sectoral approach consistent with the objectives of the RBMP.

In addition to the actions in wastewater and septic tank management, the steps taken by farmers through compliance with the NAP contribute significantly to the broader efforts. Progress across all these sectors working together, is essential for achieving lasting improvements in water quality in NI.

With cross sectoral support, this NAP is a further important step on the journey towards improving water quality.

3 Review of implementation of the Nutrients Action Programme Regulations (2019) in Northern Ireland.

2.2 Legal Framework

The first Nitrates Action Programme was introduced in 2007 and a decision was taken to apply the measures across the whole region to reflect local farming practices and environmental conditions. The NAP has been reviewed and updated several times since then, in 2010, 2014 and 2019, and it is now referred to as the Nutrients Action Programme (NAP). These reviews reflect an ongoing commitment to improving the Programme and ensuring that it is based on the best available evidence.

The current Nutrient Action Programme (Northern Ireland) Regulations 2019[4] (The NAP Regulations 2019) brought together two separate sets of regulations into one framework:

- The Nitrates Action Programme Regulations, and
- The Phosphorus (Use in Agriculture) Regulations.

Bringing these regulations together has made the rules clearer and easier to understand. It has also improved how nutrient management and environmental protection are regulated in NI.

Derogation for grass-based farming

In 2007, NI secured a derogation from the European Commission which applies to a small percentage of farms. This allows eligible farmers to apply up to 250 kg of nitrogen per hectare per year from grazing livestock manure, instead of the standard limit of 170 kg of nitrogen per hectare per year subject to meeting additional environment requirements and inspections. This derogation was renewed at each review following intense scrutiny by the European Commission and each time required a vote at the EU Nitrates Committee.

Position following Exit from the European Union

Following the United Kingdom's exit from the European Union (EU), the Nitrates Directive was assimilated into domestic law. This ensured continuity and avoided changes to environmental protections.

The functions previously carried out under the Directive were transferred to DAERA through the Environment (Legislative Functions from Directives) (EU Exit) Regulations 2019[5]. This allows DAERA to continue applying strong protections for NI's water environment.

Current statutory arrangements

The main legal instruments used to give effect to these requirements across NI are:

- The Protection of Water Against Agricultural Nitrate Pollution Regulations (Northern Ireland) 2004[6], and
- The Nutrient Action Programme (Northern Ireland) Regulations 2019.

These regulations do not operate on their own. They interact with a wider set of environmental and agricultural rules.

Links to River Basin Management Plans

River Basin Management Plans (RBMP) form the overarching framework for protecting and improving water quality.

4 The Nutrient Action Programme Regulations (Northern Ireland) 2019
5 The Environment (legislative Functions from Directives)(EU EXIT) Regulations 2019 https://www.legislation.gov.uk/uksi/2019/1350
6 The Protection of Water Against Agricultural Nitrate Pollution Regulations (Northern Ireland) 2003 https://www.legislation.gov.uk/nisr/2003/259/made

Under the Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017[7], DAERA is required to prepare and implement a RBMP every six years. The Third Cycle RBMP (2021-2027)[8] was published on 13 June 2025. DAERA plans to consult on a draft Fourth Cycle RBMP (2028-2033) in December 2026.

Under these Regulations, DAERA must:

- Assess the condition of waterbodies and identify those that are at good status or better (good ecological and chemical status being the key target)
- Set objectives for improving waterbodies that are below good status
- Include a Programme of Measures, which sets out actions needed over the next six year period to protect and improve water quality

NI's rivers, lakes, groundwater and coastal waters are managed using a catchment-based approach. This means looking at whole river catchments, rather than individual sites, to protect and improve water quality.

The NAP is a core measure within the 3rd cycle RBMP Programme of Measures. Effective implementation of the NAP is essential to achieving the objectives of the 3rd cycle RBMP.

The NAP will continue to play a central role in supporting the delivery of future RBMP's and the protection of the water environment across NI.

Measures to Control Pollution

The RBMP includes measures to prevent and/or reduce pollution from a range of identified pressures.

These measures are also supported by other plans where needed.

They cover pollution from:

- Urban wastewater treatment
- Industrial discharges
- Domestic septic tanks.

Nutrient Pollution from Agriculture

The RBMP must include measures to prevent and/or control pollution from diffuse sources, including agricultural runoff. In NI, the NAP sets rules and standards for the use and management of nutrients to help protect water quality. It is the basic agricultural measure in the RBMP.

By making more efficient use of nutrients such as nitrogen and phosphorus, the revised programme will help reduce the risk of pollution entering rivers, lakes and the air. This will support healthier ecosystems while also helping to ensure farming continues in a sustainable way.

Climate Change Act (Northern Ireland) 2022[9]: This law sets legally binding targets to reduce greenhouse gas emissions:

- Key targets:
  - Reach net zero emissions by 2050 (no overall contribution to climate change)
  - Reduce emissions by at least 48% by 2030 and around 77% by 2040.

7 The Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017
8 https://www.daera-ni.gov.uk/publications/third-river-basin-management-plan-northern-ireland
9 https://www.legislation.gov.uk/nia/2022/31/contents

The revised NAP programme will help by improving nutrient efficiency and reducing emissions from fertilisers and livestock, which are important sources of greenhouse gases.

National Emission Reduction Commitments Directive[10]: This law sets limits on air pollution, including ammonia from agriculture:

- Key target: Reduce ammonia emissions in line with national reduction commitments by 2020-2029 and further reductions from 2030 onwards.

The revised NAP programme will help by encouraging better manure and fertiliser management to reduce emissions.

Habitats Directive[11]: This law protects important natural habitats and species:

- Key target: Maintain and restore habitats so they are in "favourable condition", meaning they can survive and thrive in the long term.

The revised NAP programme will help by reducing nutrient pollution that can damage sensitive habitats.

Northern Ireland and UK air quality policies: These policies aim to reduce air pollution, particularly ammonia, to protect health and nature:

- Key target: Achieve sustained reductions in ammonia emissions from agriculture.

The revised NAP programme will support this by introducing practical measures that reduce emissions on farms.

2.3 NAP review process

Why the NAP is being reviewed

DAERA began a review of the NAP Regulations 2019 in October 2023.

The aim of this review was to check how well the existing rules are working and to decide whether changes are needed to better protect water quality, in compliance with the legal framework, set out in Section 2.2. As part of the review, DAERA published two key reports:

- The NAP Implementation Report 2020-2023[12]
- The Review of the 2019 Nutrient Action Programme Regulations [13].

These reports set out how the current regulations have been applied in practice, and what impact they have had. They have helped to inform revised proposals for the next NAP.

The NAP Implementation Report 2020-2023

This Implementation Report was prepared to meet a legal requirement under the NAP Regulations 2019.

The Regulations require NI to regularly review:

- How the NAP is being put into practice, and
- Whether it is helping to protect and improve water quality.

The report provides evidence to support decisions on whether changes are needed to future NAP measures.

10 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.344.01.0001.01.ENG&toc=OJ:L:2016:344:TOC
11 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701
12 https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Nutrients%20Action%20Programme%20Implementation%20Report%202020-2023.pdf
13 https://www.daera-ni.gov.uk/sites/default/files/2025-06/Review%20of%20the%202019%20Nutrient%20Action%20Programme%20Regulations%2027-6-25.PDF

What the Report Covers

The report looks at how nutrients from agriculture affected the environment during the period 2020 to 2023. In particular, it focuses on nutrients such as nitrogen and phosphorus, which can enter rivers, lakes and coastal waters.

At a high level, the report examines:

- Water quality
- Farming practices and nutrient use
- Implementation of NAP rules
- Effectiveness of current measures
- Forecasts of future water quality.

Purpose of the Report

The report brings together monitoring data and agricultural information to show:

- How well the current NAP is working
- Where further actions may be needed to better protect water quality.

This information is used to inform the review and development of future NAP measures and support delivery of Water Framework Regulations objectives.

Review of the 2019 Nutrient Action Programme Regulations

The NAP Regulations 2019 were reviewed to check how well they were working and whether they were helping to protect water quality in NI.

The review looked at:

- Water quality monitoring results
- Farming practices and nutrient use
- Compliance with existing NAP rules
- Scientific research and environmental assessments.

Its findings have helped inform the proposals now being consulted on.

What the review found: Current condition of water bodies in Northern Ireland

Monitoring data shows that many rivers, lakes and coastal waters in NI are affected by excess nutrients, particularly nitrogen and phosphorus. While some long-term improvements have been made, more recent data across a number of metrics show that water quality is below the level required to meet environmental objectives. Existing NAP measures have not been able to fully address this, thereby demonstrating that existing measures are not sufficient to meet Water Framework Regulation objectives.

Nitrates in rivers and lakes

- Most rivers and lakes still have average nitrate levels below 10 mg per litre. (Whilst 50 mg per litre is the drinking water standard, there are currently no environmental quality standards for nitrates in rivers. However, 10 mg per litre is closer to a level where changes in the ecology can be expected. Ireland uses 8 mg per litre as a guideline for ecological health in rivers).
- However, the number of sites with higher nitrate levels has increased over time.

- The proportion of sites with maximum nitrate concentrations staying below 10 mg per litre has fallen:
  - 58% of sites in 2012-2015
  - 49% of sites in 2016-2019
  - 40% of sites in 2020-2023.
- More sites are now recording higher peak nitrate levels, and one river site recorded a level above the mandatory limit of 50 mg per litre, reaching 68.5 mg per litre.
- Data from 499 sites across the time range (1992-2023) show that while nitrate levels fell overall from the early 1990s, this hides recent increases.
- The number of sites showing rising nitrate long term trend levels has grown sharply:
  - 4.6% of sites in 2016
  - 9.8% of sites in 2020
  - 23.6% of sites in 2024.

What this shows

Although average nitrate levels remain below key thresholds, water quality is deteriorating at an increasing number of locations.

Phosphorus in rivers

- Between 2020 and 2023:
  - 58.5% of river sites were classed as High or Good for phosphorus levels which is a decline of 11.8% reported in 2012-2015
  - 41.5% of river sites were below Good status and at risk of nutrient pollution.
- Although phosphorus concentrations are lower than the peak observed in 1998, trend analysis indicates the initial falling trend to the low change point recorded in 2012 has been replaced by an upward trend.
- While concentrations fluctuate from year to year, there has been no sustained improvement and since 2016 average phosphorus levels have consistently remained above 0.060 mg per litre.

What this shows

Almost half of rivers remain affected by excessive phosphorus, which can damage ecosystems and water quality.

Nutrient impacts on rivers (trophic status)

- Trophic status describes how nutrient enrichment affects plant and algal life in rivers.
- 49% of monitoring stations were below Good status, meaning they are showing signs of higher nutrient levels.
- At full river water body level, this increases to 52%.

What this shows

More than half of rivers are affected by excess nutrients, which can lead to increased plant and algae growth.

Nutrient impacts on lakes (trophic status)

- Of the 21 lakes monitored in NI, 18 lakes are classed as Moderate, Poor or Bad status.
- Lakes are particularly vulnerable and recover slowly, so continued nutrient inputs will cause long term damage if not addressed.

What this shows

This means most lakes are experiencing eutrophication, where too many nutrients lead to excessive plant and algae growth.

Transitional and coastal waters

- Over 60% of estuaries and coastal waters now show higher nitrate levels than in previous years.
- After improvements between 2008 and 2017, nutrient levels have been rising again since 2017.
- The most affected areas include estuaries and sea loughs, where there are early signs of:
  - Increased nutrient levels
  - Reduced oxygen
  - Changes in algae and seaweed.
- Some pesticides and herbicides have also been detected, indicating impacts from land-based activities upstream.

What this shows

Coastal waters are becoming more sensitive to nutrient pollution, with risks to habitats, fisheries and protected sites.

Agriculture and nutrient pressures

- 77% of NI's land is used for agriculture.
- 93% of this land is grassland and used for livestock farming.
- In 2024, agriculture had a phosphorus surplus totalling 8,729 tonnes across NI.
- Much of the phosphorus surplus is associated with imports of feed for livestock and chemical fertilisers. These imports exceed the amount removed in exports of agricultural products.
- Many soils now contain more phosphorus than crops need, increasing the risk of nutrients washing into rivers and lakes during rainfall.

What this shows

Ongoing nutrient surpluses mean existing controls have not been sufficient to prevent phosphorus build up in our soils from where it is at risk of loss to water bodies.

Why a revised NAP is needed

Taken together, the evidence shows that:

- A large proportion of rivers and most lakes remain affected by excess nutrients.
- Coastal and estuarine waters are deteriorating again after earlier improvements.
- Agricultural phosphorus surpluses continue, increasing pressure on water bodies.
- There is a continued decline in freshwater and terrestrial biodiversity due to nutrient enrichment.

These trends demonstrate that, while current NAP measures have delivered some benefits, they are not enough to reverse recent declines in water quality. A revised and strengthened NAP is therefore needed to better protect and improve NI's rivers, lakes and coastal waters.

How the review is being used

The findings of the review:

- Helped identify what is working well under the current NAP
- Highlighted areas where further action may be needed
- Informed the development of the revised proposals now being consulted on.

As part of the current review, environmental assessments were also carried out to ensure potential impacts on protected sites and the wider environment have been properly considered.

2.4 Stakeholder Engagement

2025 Public consultation

A public consultation on the proposed revised NAP was held between May and July 2025. More than 3,400 responses were received from farmers, stakeholders and members of the public.

A summary of the consultation responses has been published alongside this consultation.

DAERA has carefully reviewed all the feedback received during the 2025 consultation. The responses highlighted a number of issues and showed that further work was needed.

The NAP Stakeholder Task and Finish Group

Following the 2025 NAP consultation, and recognising the need for further engagement, the Minister established a Nutrients Action Programme Stakeholder Task and Finish Group (NAPSTFG).

The purpose of the group was to:

- Review the proposals set out in the 2025 NAP consultation
- Consider the consultation responses
- Look at alternative approaches and supporting evidence
- Develop proposals which are workable at farm level while remaining legally compliant.

The group brought together representatives from:

- The farming sector
- The agri-food industry
- Environmental organisations
- DAERA.

Meetings were chaired by an independent external facilitator, and the Terms of Reference and membership list have been published and are available alongside this consultation.

Subgroups

The NAPSTFG was supported by a number of subgroups, which provided specialist input to inform discussions and support decision making:

- Science Subgroup
  - Led by an external chair, this group examined the scientific evidence underpinning the proposals and provided advice to the NAPSTFG.
- Technical Working Group
  - This group considered the practical and technical aspects of the proposals, focusing on how they would operate in practice.
- Economic Impact Assessment Subgroup
  - This group considered the potential economic impacts of proposed measures.

Final report

From this work, the NAPSTFG developed a range of evidence-based measures and actions aimed at being both legally compliant and workable at farm level. The group submitted a final report with these revised proposals to the Minister for consideration. This report is available alongside this consultation. It forms the basis of the proposals within this consultation.

This process has helped ensure that the proposals have been tested against scientific evidence, technical feasibility and practical delivery considerations, strengthening their overall robustness and supporting a more implementation-focused approach.

Response to 2025 Consultation

The engagement process, including the 2025 consultation and the work of the NAPSTFG, has played a key role in refining and strengthening the proposals. Feedback has helped ensure that measures are practical, evidence-based and capable of being delivered in real-world farming systems.

The table below sets out the key issues raised by stakeholders in the 2025 consultation, and how DAERA has addressed those in this 2026 consultation based on the proposals from the NAPSTFG.

Theme	You said…	We did…
Engagement and transparency	You said that engagement and communication during the consultation process should be improved, with greater transparency.	We established a NAPSTFG and specialist subgroups to co-design proposals. We are committed to ongoing engagement, publication of supporting evidence, and clearer communication of both the rationale for change and how measures will operate in practice.
Practical, workable measures	You said that improving water quality is important and should be evidence-based, but that some proposals were not practical or reflective of real farm conditions.	We developed proposals through a co-design process with the NAPSTFG and its subgroups. New proposed measures are structured into clear categories that place greater emphasis on practical solutions that are workable at farm level, supported by advisory services and phased delivery (e.g. The Nutrient Stewardship Programme and the Tiered approach to LESSE).
One size does not fit all	You said that a one-size-fits-all approach is not appropriate and that measures should be flexible and risk-based, particularly for buffer strips, slurry application, LESSE and nutrient limits.	We are proposing to introduce a focused, catchment-based approach to target action where risks are highest. Relevant measures include tiered and phased implementation, with flexible pathways to reflect differences between farms.
Cost and farm viability	You said that costs and impacts on farm viability are a major concern, especially for smaller farms and in relation to measures requiring new equipment or infrastructure.	We are proposing that some measures be delivered over time, allowing farms to adapt (e.g. phased LESSE implementation to 2030). We aligned proposals with financial support, including the Sustainable Agriculture Programme, and included measures to improve efficiency and reduce input costs, such as updated excretion values and improved nutrient use. A detailed and rigorous Regulatory Impact Assessment has been prepared to accompany the NAP consultation. This provides the costs and benefits of implementing the revised proposed measures. A full Economic Impact Assessment will be finalised as part of the work of the NAPSTFG and this will be essential to help inform implementation.

Theme	You said…	We did…
Science and evidence	You said that the scientific basis for some proposals was unclear and that stronger evidence, transparency and alignment with farm practice are needed.	The new proposals are based on expert input from specialist subgroups, the NAP Review Report and monitoring data. We are proposing that some standard nutrient excretion values be updated to reflect current production systems, with a focus on improving the accuracy of nutrient accounting.
Efficiency and innovation	You said that you support improved nutrient efficiency and circular approaches, but that greater clarity is needed on how these would work in practice.	We are proposing to introduce measures to help support slurry processing, processed organic fertilisers, anaerobic digestate management, strengthen nutrient tracking and develop a Nutrient Efficiency Roadmap to guide longer-term improvements.
Advisory and voluntary approaches	You said that advisory, voluntary and supported approaches are preferable in some areas, rather than additional regulation.	We are proposing to introduce a mix of advisory, voluntary and regulatory measures, supported by CAFRE and wider advisory services. Measures such as liming, buffer strips and nutrient management are supported through guidance and knowledge transfer, alongside targeted regulation where needed.
	You said that greater investment in advice, guidance and financial support is needed to help farmers comply with the regulations.	We are proposing to expand advisory support including CAFRE, industry engagement, catchment-based advice and peer learning, alongside funding schemes and knowledge transfer measures. A Nutrient Efficiency Roadmap will be developed to support core advisory messages and implementation.
Administrative burden	You said that there are concerns about complexity, paperwork and administrative burden, particularly for smaller farms and new digital systems.	We are proposing systems to simplify and modernise record-keeping, including improved online reporting. We clarified terminology and focused on proportionate, risk-based enforcement rather than blanket increases in inspection.

Theme	You said…	We did…
Phosphorus and nitrogen limits	You said that there are concerns about proposed phosphorus and nitrogen limits, including feasibility, production impacts and lack of clarity.	We are proposing a combination of measures to reduce nutrient surplus over time, rather than relying on a single limit. This approach focuses on improving efficiency while allowing flexibility for different farm systems to contribute to overall reductions.
Enforcement and penalties	You said that the enforcement approach and penalties should be clearer and sufficient to incentivise compliance.	We are proposing a clearer enforcement framework, including strengthened inspection provisions and measures addressing false or misleading information.
Soil analysis and nutrient planning	You said that soil analysis should be mandatory and that fertiliser and manure applications should be based on crop need.	We are proposing expanded requirements for soil testing and nutrient management planning, linking fertiliser and manure use more closely to soil need and crop demand.
Air pollution (ammonia) controls	You said that nutrient controls should address air pollution as well as water pollution.	We are proposing to introduce ammonia mitigation measures including LESSE, urea controls and storage cover requirements, linked to wider air quality policy.
Contribution to Water Framework Directive objectives	You said that the NAP should clearly demonstrate how measures contribute to Water Framework Directive objectives (WFD).	We set out in the legal framework (Part 2.2 above) how measures support WFD objectives, including reducing nutrient runoff and improving water quality to achieve “good status”.
Nutrient efficiency roadmap	You said that a joined-up, sector-wide roadmap is needed for improving nitrogen and phosphorus efficiency.	We are proposing the development of a Nutrient Efficiency Roadmap for NI, co-designed with stakeholders and supported by governance arrangements.

Theme	You said…	We did…
Review phosphorus balance targets for intensive farms	You said that proposed phosphorus balance targets, particularly for more intensive farms, should be reviewed to ensure they are sufficient to achieve environmental outcomes.	We are proposing to introduce measures to reduce phosphorus surplus, including a 30% reduction in the national average surplus and requirements for higher stocking farms to reduce P balance through the Nutrient Stewardship Programme or other controls.
Theme: Policy Interconnection	You said that NAP cannot be considered as a standalone issue in the context of interconnection with wider environmental policy relating to Ammonia and the Climate Action Plan.	The Task and Finish Group was very cognisant of the wider policy landscape in the co-design process. In particular how the operational protocol for planning considerations with regard to ammonia was a key element in unlocking certain measures in the NAP review.
Source Apportionment	You said that the contribution of agriculture to nutrient loading in waterways was denoted at 62% and that you were concerned that contributions from wastewater were underestimated.	The Task and Finish Group identified an early priority for the Science Subgroup to review the available evidence on source apportionment. The Subgroup highlighted that there were limitations to the data but there is no doubt about agriculture being one of the major contributors and that NAP was a key part of reducing that sector's contribution.

Moving forward together

Improving water quality and how nutrients are managed is a shared challenge. It will take time and consistent effort to make lasting progress.

We recognise that this is not easy. The changes set out in this consultation will require:

- Changes for some in farming practices
- Investment of time and resources
- Continued engagement across the sector.

A long-term journey

There is no single solution. Progress will depend on a range of actions working together, including:

- Practical measures that can be applied on farms
- Better use of evidence and data
- Improved management of nutrients across all farm systems.

Support will also be important. This includes:

- Access to advice and guidance
- Knowledge transfer and training
- Financial support through available schemes.

Everyone has a role to play

Improving outcomes will require a collective effort. This means:

- Farmers taking practical steps at farm level
- Industry supporting change and innovation
- Government providing clear direction and support.

By working together, and each doing our part, we can achieve:

- Better water quality
- A healthier environment
- A more sustainable future for agriculture in NI.

Ongoing engagement

We are committed to continuing this work in partnership with stakeholders. This includes:

- Ongoing engagement and dialogue
- Sharing evidence and information
- Ensuring measures remain practical and effective.

This consultation is an important step. It is part of a wider journey where continued collaboration will be essential to delivering real and lasting change.

Your Role in This Consultation

You are being asked to:

- Review the proposals set out in this document
- Provide your views and feedback through the consultation process.

This consultation replaces the 2025 NAP consultation and is informed by the revised proposals put forward by the NAPSTFG.

Part 3 - Support through Advice and Funding to Delivery Change

Part 3 - Support through Advice and Funding to Deliver Change

DAERA acknowledges that farmers need clear guidance on how proposed measures will affect their businesses and be implemented in practice.

Support is available to help address these concerns and assist with any changes. This includes:

- Advice and guidance to explain the requirements in clear terms and help farmers apply them on their farms
- Funding to assist with the costs of making changes, where appropriate.

The proposals also reflect wider interests. The agri-food industry and environmental organisations have an important role in supporting a sustainable and productive sector, while improving outcomes for water quality and the environment.

The following sections set out the types of advice, guidance and funding available, to help farmers make informed decisions and adapt in a practical and manageable way.

3.1 Advice/Guidance

Managing nutrients effectively can be complex. It involves decisions about fertiliser use, manure management, soil health, and compliance with regulations.

Clear advice and guidance are essential to:

- Help farmers understand and meet regulatory requirements
- Support better decision-making on farms
- Reduce nutrient losses to water and air
- Improve efficiency and reduce costs.

Evidence shows that farmer awareness and engagement are key to adopting good nutrient management practices.

Farmers can access advice and support from a range of sources to help them understand and implement the proposed measures. This includes DAERA guidance, CAFRE advisory services, industry organisations, and support from the wider agri-food supply chain. Together, these services provide both regulatory guidance and practical, farm-level support.

Where farmers can access advice and support

1. DAERA guidance and information

DAERA provides a range of guidance to support farmers, including:

Nutrients Action Programme Guidance Booklet:

- Explains the rules in plain terms
- Sets out what farmers must do to comply
- Includes summaries, examples, and practical actions
- Provides templates and calculation examples.

Workbooks and guidance tools:

- Help farmers calculate nutrient loading and fertiliser use
- Support preparation for inspections.

Derogation guidance:

- Explains additional requirements for farms operating above standard nutrient limits.

This guidance is designed to be clear and practical, reducing the need for farmers to refer directly to legislation. All guidance will be updated subject to the outcome of the consultation.

2. CAFRE (College of Agriculture, Food and Rural Enterprise)

CAFRE provides a wide range of advisory and training support to farmers.

Knowledge Advisory Service:

- Free advisory service available to all farm businesses
- Provides advice on nutrient management and environmental practices
- Delivered through specialist advisory teams.

Online nutrient calculators: CAFRE provides tools to support compliance and planning, including:

- Nitrogen loading calculator
- Crop nutrient planning tool
- Phosphorus balance calculator
- Manure storage calculator.

These tools help farmers:

- Understand their nutrient balances
- Plan fertiliser applications
- Demonstrate compliance if inspected.

Technical guidance notes:

- Provide practical advice on specific topics (e.g. fertiliser use, slurry management)
- Available online and in hard copy.

Business Sustainability Groups

- Farmer discussion groups led by CAFRE advisers
- Provide peer learning and practical advice
- Support improved environmental and business performance.

On-farm demonstrations and events

- Farm visits, open days and demonstration farms
- Show practical examples of nutrient management in action.

Soil Nutrient Health Scheme (SNHS)

- Provides soil testing and nutrient information for every field
- Includes:
  - Soil analysis results
  - Nutrient recommendations
  - Runoff risk maps.

- CAFRE provides training to help farmers interpret results and develop nutrient plans.

This scheme is a key source of tailored, farm-level information to support better nutrient management.

3. Catchment-based and local advisory programmes

For example;

The Sustainable Catchment Programme (SCP):

- Provides on-farm, tailored advice in targeted areas
- Includes:
  - Individual advisory farm visits
  - Water and Environment Management Plans for each farm
  - Funded practical measures
  - Delivered by The Rivers Trust.

Evidence suggests this approach can improve water quality and farm practices.

Farm Water Project:

- Delivered in partnership with farming and environmental organisations
- Provides training and practical support on water quality.

4. Industry Bodies and Representative Organisations

Such as UFU, NIAPA, Dairy Council NI who help deliver understanding of sector-specific implications.

Provide:

- Guidance notes and summaries of proposals
- Workshops, briefings and peer learning opportunities.

5. Agri-food Supply Chain (co-ops, processors, merchants)

Many offer:

- Agronomy advice
- Nutrient efficiency guidance
- Workshops and information events.

Together, these sources provide a combination of regulatory guidance and practical support to help farmers prepare for and implement the proposed measures.

Farmers are encouraged to:

- Make use of available guidance and tools
- Seek advice early, particularly when planning nutrient applications
- Use soil analysis and nutrient planning tools to inform decisions
- Engage with CAFRE advisers and local support programmes
- Consider both regulatory requirements and practical farm conditions.

3.2 Funding

Funding will play an important role in helping farmers put the proposed measures into practice. Many of these measures may require changes to how farms are managed, and some farms may need to invest in new equipment and infrastructure. Assistance through funding can help reduce these costs and make it easier to adopt the changes needed.

Providing support also helps ensure that the measures can be applied in a practical and fair way across the farming sector. It can encourage early action, support business stability, and help deliver environmental improvements alongside continued food production.

A range of funding schemes is available, or is expected to become available, to support farmers. Details of these can be found at DAERA's Grants and Funding page https://www.daera-ni.gov.uk/topics/grants-and-funding. These schemes cover areas such as farm investment, environmental actions, and nutrient management.

This section outlines the main types of funding that may be available, including:

- Payments for environmental actions and improvements
- Grants for equipment, infrastructure, and technology
- Funding for nutrient management and soil health
- Support through wider agriculture and rural development programmes.

Farmers are encouraged to consider how funding could help them meet the proposed requirements of the NAP.

Examples of Funding available through DAERA

The Sustainable Farming Investment Scheme (SFIS)

This will support improved environmental performance on farms. SFIS will provide grant support for equipment and technology which will help reduce soil compaction and erosion, poaching near watercourses by livestock, and the risk of run-off or leaching of nutrients and chemicals.

Support will focus on a pre-selected list of items, including Low Emission Slurry Spreading Equipment (LESSE). The scheme will have a grant rate of 40%, with a maximum grant amount of £25,000 available per farm business across the scheme.

Sustainable Agriculture Programme (SAP)

This is striving to improve environmental outcomes while supporting a more resilient, sustainable farming sector.

A key aim is enhancing water quality, particularly by reducing nutrient losses, improving soil management, and restoring natural processes across agricultural landscapes.

SAP plans to deliver this through a suite of schemes and initiatives; most notably the Farming with Nature Package, the Sustainable Farming Investment Scheme, the Soil Nutrient Health Scheme, and emerging excess nutrient policies.

Sustainable Catchment Programme (SCP)

The advisory work carried out by the Rivers Trust is delivered through projects supported under the Environmental Farming Scheme (EFS) Group measure. The SCP funding covers grant aid for the capital costs of the on-farm measures.

The SCP catchments represent a geographical spread across NI, as well as a range of farming operation types, sizes and landscape settings (i.e. inland and coastal catchments, lowland and upland, highly productive and poor productive areas).

To date, the SCP has delivered a total funding of £4.9 million on key measures including creating riparian margins, livestock river fencing, alternative drinkers, clean/dirty water separation, soil health, and pollution prevention works, which significantly enhance farm and watercourse health.

DAERA is currently scoping the expansion of the SCP to support voluntary measures and advisory support for the farming sector on sustainable actions related to water quality.

Farming with Nature Package

This is a key element of the SAP, designed to support farmers to deliver environmental improvements and support long-term sustainability. It is the replacement for elements of the EFS and aims to reverse the trends in nature decline through retaining, maintaining, restoring and creating habitats that are important for species diversity and improved connectivity between habitat areas.

Just Transition

As set out in the Climate Change Act (NI) 2022, DAERA is required to establish a scheme for the administration of a fund to be known as the "Just Transition Fund for Agriculture".

Its purpose is to provide information, knowledge and financial assistance to the agriculture sector to help deliver its contribution to meeting carbon budgets and emissions reduction targets by developing and implementing proposals and policies to be included in Climate Action Plans.

Policy development work is ongoing to support the delivery of the Just Transition Fund for Agriculture, and this will be aided by the work being taken forward to establish a Just Transition Commission.

Shared Island investment in Lough Neagh

The Lough Neagh Catchment Programme is a five-year initiative running from 2027 to 2031, aimed at improving water quality across the catchment area through a coordinated, cross-border approach. The programme will be jointly funded by DAERA, the Shared Island Initiative, and the Department of Housing, Local Government and Heritage (DHLGH).

The total anticipated cost of the programme is €56.7 million (approximately £49.3 million). The NI element of the programme is expected to provide £31.5 million, comprising £20 million (€23 million) from the Shared Island Initiative and £11.5 million from DAERA's Capital DEL budget. Funding will be provided for on-farm measures designed to reduce environmental impacts and improve water quality, with an advisory led and supported approach for farm businesses in the Blackwater and other Lough Neagh catchments.

Part 4 - Proposed Measures

Part 4 - Proposed Measures

The proposed measures have been developed to provide a more targeted and practical approach to reducing nutrient losses and improving water quality. They are based on available evidence, informed by stakeholder input, and designed to be deliverable in practice across a range of farm systems.

How the proposed measures are organised

For consultation purposes, the proposed measures from the review of the NAP have been grouped into seven categories.

This grouping is designed to make the proposals easier to understand, support clear and structured responses, and show the different ways the Programme aims to reduce nutrient losses from agriculture.

The seven categories are:

4.1 Nutrient Management - Balanced Nutrient Use, Fertiliser and Manure Controls

4.2 Manure Storage and Application Requirements - Ammonia Implications

4.3 Farming Practices to Improve Nutrient Use and Water Quality

4.4 Utilising Technology

4.5 Additional Measures to Support Environmentally Sustainable Farming

4.6 Definition Updates & Technical Amendments

4.7 Implementation - Including Inspections/Enforcement.

Each proposed measure is grouped under the category that best reflects its main focus.

To make the consultation easier to follow, each proposal uses a consistent format setting out what is changing, why it is being considered, and what it aims to achieve:

- A brief introduction explains the issue being addressed
- The current position under the 2019 NAP is outlined
- The proposed measure is then described
- Finally, the expected benefits are summarised.

Some of these proposals would change the current rules and may mean things have to be done differently. Other proposals are intended to make the existing rules clearer and easier to understand.

Cross cutting measures

Some measures contribute to more than one category. Where this is the case, DAERA recognises that these proposals are cross cutting and support several aspects of the programme.

4.1 Nutrient Management - Balanced Nutrient Use, Fertiliser and Manure Controls

4.1 Nutrient Management - Balanced Nutrient Use, Fertiliser and Manure Controls

Effective nutrient management is key to protecting water quality while supporting sustainable agricultural production. Nutrients such as nitrogen and phosphorus are essential for plant growth, but if they are not managed carefully, they can be lost to the environment and contribute to pollution.

The proposals in this section focus on improving how nutrients are used on farms so that they are applied in the right amounts, at the right time, and in the right place. This aims to reduce nutrient losses to water and air, while supporting efficient and productive farming systems. The approach set out in this section recognises that improving nutrient management requires a combination of updated rules, better use of data, and clearer guidance. It also reflects the need to ensure that measures are practical and can be applied across a range of farm types and systems.

The proposed measures include:

- Improving how phosphorus fertiliser is used and reducing the overall phosphorus surplus
- Updating how nutrient outputs from livestock are calculated to better reflect modern farming systems
- Strengthening the accuracy of standard values used for manure and slurry management
- Updating nitrogen fertiliser limits to better match crop needs
- Supporting the use of processed organic fertilisers as part of a more balanced nutrient system.

Together, these measures are intended to:

- Improve nutrient efficiency at farm level
- Reduce the risk of nutrient losses to rivers, lakes and the wider environment
- Support clearer and more accurate nutrient accounting
- Contribute to long-term improvements in water quality.

This approach reflects the need to balance environmental outcomes with practical implementation, ensuring that measures can be applied effectively at farm level while contributing to long-term improvement.

The following sections set out the detail of each proposed measure.

Proposed Measures

4.1.1	**Limit chemical phosphorus fertiliser availability through an advisory approach**
4.1.2	**Reducing Northern Ireland's average phosphorus surplus**
4.1.3	**Dairy cow nutrient excretion values - based on milk yield**
4.1.4	**Updated poultry nutrient excretion figures**
4.1.5	**Standard values for separated manures and slurries**
4.1.6	**Updated chemical nitrogen fertiliser limits for grassland**
4.1.7	**Allowance for processed organic fertilisers**

4.1.1 Limit chemical phosphorus fertiliser use on grassland through an additional advisory approach

Introduction

Phosphorus is an essential nutrient for crop and grass growth, but too much phosphorus can damage rivers and lakes. Monitoring data shows that phosphorus levels are increasing in many waters across NI, contributing to poor water quality, including in Lough Neagh.

While it is recognised that the industry has made reductions in phosphorus inputs within the sector, it is the previously accumulated phosphorus that can continue to affect water quality. It is essential that we look at what actions we are taking and further actions we can take to help prevent a surplus of phosphorus or other nutrients within the agriculture sector.

Position under 2019 NAP

Under the 2019 NAP rules, all farms must already have soil analysis and a fertilisation plan to justify the use of chemical phosphorus fertiliser. However, chemical phosphorus fertiliser continues to be widely available and is often used routinely on grassland, even where it is not needed.

Reasons for Change

The Review of the 2019 NAP Regulations has highlighted that agriculture in NI is operating with a high phosphorus surplus, meaning more phosphorus is applied than crops need.

This surplus mainly comes from:

- Livestock feed, and
- Chemical phosphorus fertilisers.

While imported livestock feed is the most significant contributor to the overall phosphorus surplus, the use of chemical phosphorus fertiliser is a direct and more readily controllable input at farm level. Measures in this area are therefore intended to complement wider actions, including improvements in feed efficiency, as part of a broader approach to reducing overall phosphorus surplus.

Evidence shows that:

- There is enough phosphorus in slurry and manure to meet most crop needs overall
- Around 40% of agricultural land already has excess soil phosphorus
- Where soil phosphorus is higher than crops require, the excess is more likely to be lost to water.

What is being proposed

It is proposed to introduce a new additional approach to managing the use of chemical phosphorus (P) fertiliser on grassland. This approach builds on the existing NAP requirement and combines limits on the availability of phosphorus fertiliser products with strengthened advice and support. The aim is to ensure that phosphorus fertiliser is only used where there is a clear need based on soil nutrient levels and crop requirements.

The proposed approach introduces a set of linked measures to manage how chemical fertiliser containing phosphorus is supplied and used on grassland. The existing NAP requirements for the use of chemical fertiliser containing phosphorus on arable land remain unchanged.

Limiting chemical phosphorus fertiliser use on grassland

The use of chemical phosphorus fertiliser will be linked to recent soil test results and based on crop requirement, as already in place through the 2019 NAP Regulations. In addition, the availability of chemical phosphorus fertiliser products with a lower phosphorus content will be limited to a small number of products:

- Where there is no crop requirement for phosphorus only fertiliser products with no phosphorus content can be used
- Where there is a crop requirement for phosphorus, a limited number of low-phosphorus fertiliser products can be used if required
- Higher phosphorus fertilisers will still be available and can be used where there is a clear crop requirement
- Chemical phosphorus fertilisers can only be applied where the crop need cannot reasonably be met through the use of organic manures.

The updated NAP Regulations will specify which chemical phosphorus fertiliser products can be used on grassland. These will be a limited number of low Phosphorus fertiliser products (P content 4% or lower) and higher Phosphorus fertiliser products (P content 15% or higher).

Soil testing and nutrient management planning

As is currently the requirement, farmers will be required to:

- Have a valid soil analysis obtained within the last 4 years, and
- Prepare a Nutrient Management Plan showing the need for phosphorus.

This will ensure that fertiliser is applied only where it is required.

Controls at the point of sale

Fertiliser merchants will play an important role in implementing the measures.

At the point of sale:

- Farmers will be asked to confirm that they have a soil test and a Nutrient Management Plan; and
- Chemical fertiliser products containing phosphorus will include clear labelling such as - “Apply phosphate only as needed to meet crop requirements in accordance with the NAP Regulations. Excess phosphate may be lost to waterways and could cause damage to aquatic environments.”

Training and industry responsibilities

Fertiliser merchants will be required to complete basic training on nutrient management and water quality.

Furthermore, detailed technical training will be introduced over time for those selling chemical phosphorus fertiliser products, who wish to enhance their knowledge and expertise. This training will be based on recognised industry standards.

Manufacturers, suppliers and merchants will be expected to take shared responsibility for supporting improved phosphorus management at both industry and farm level. The uptake of the more detailed technical training will be an indicator of industry support that will be reviewed.

Responsible Phosphorus Management campaign

The Responsible Phosphorus Management (RPM) campaign will be developed to support the proposed changes and encourage more responsible use of phosphorus.

This will include:

- Guidance materials for farmers
- Information available through fertiliser merchants
- Support from farming organisations, agri-food businesses and environmental groups.

Review of the measure

This measure is of critical importance to reducing the overall phosphorus surplus and its effectiveness will be reviewed after two years, and again as part of the wider NAP review, as set out in the governance section.

This will assess whether the approach is reducing the use of chemical phosphorus fertiliser and contributing to improved water quality. If the review concludes that the approach is not effective, then a more restrictive regulatory system will be required.

The benefits of this are:

- **Reduce unnecessary use of chemical phosphorus fertiliser**
- **Improve water quality by lowering phosphorus losses to rivers and lakes**
- **Help farmers use nutrients more efficiently and reduce input costs**
- **Share responsibility across farmers, industry and suppliers rather than relying on enforcement alone.**

Question 1

i. To what extent do you agree or disagree with the proposed changes to how chemical phosphorus (P) fertiliser is managed on farms?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to explain your answer or provide any additional comments.

4.1.2 Reducing Northern Ireland's average phosphorus surplus

Introduction

Phosphorus levels in many rivers and lakes in NI remain too high, contributing to algal growth and poor water quality. Although some progress has been made in recent years, average phosphorus concentrations in rivers are still above levels needed to achieve good ecological status.

A key reason for this is that, on average, more phosphorus is brought onto farms than is removed in products such as milk, meat or crops. This difference is known as the farm gate phosphorus balance. The national surplus is around 8729 tonnes (2024 figure). It is estimated that this surplus should be reduced by around 30%.

Over time, this surplus leads to a build-up of phosphorus in soils. When soils contain more phosphorus than crops need, the risk of phosphorus being washed into nearby watercourses increases, particularly during heavy rainfall. Even if phosphorus inputs are reduced now, previously accumulated phosphorus can continue to affect water quality for many years.

Position under the 2019 NAP

Under the existing regulatory requirements, only those farms operating under a derogation are required to operate within a phosphorus balance of not more than 10 kg of phosphorus per hectare per year.

Reasons for the Change

Scientific evidence shows that:

- Long-term phosphorus surpluses are closely linked to elevated phosphorus levels in rivers and lakes
- Reductions in phosphorus inputs are necessary to prevent further build-up of phosphorus in soils.

Action is needed alongside other measures, such as targeted land management, to achieve lasting water quality improvements.

Without further action, current phosphorus levels in waterways are likely to remain too high to meet environmental objectives.

A 30% reduction target has been identified an appropriate target for the agricultural sector over the next NAP 2027 - 2030. The target takes into account phosphorus reductions to be achieved by improvements in wastewater treatment, so that the entire burden of reduction does not fall solely on the agricultural sector.

What is being proposed

It is proposed to reduce the national average phosphorus surplus by 30%, from the 2024 level of 8729 tonnes over the 4 year duration of the next NAP.

This 30% reduction was carefully evaluated and collectively agreed upon as a realistic target that aligns with national objectives whilst being feasible for farms that need to implement change.

It is recognised that delivering the 30% reduction target is dependent on the further development of manure processing facilities/end of pipe solutions to process and manage nutrients off farm and export them from the NI agricultural system.

This reduction would be achieved through a combination of measures, including;

All farms with livestock manure nitrogen (N) production levels at or above 170 kg N/ha per year must comply with proposals relevant to their sector, and must do one of the following:

- Ruminant livestock farms above the 170 kg N/ha threshold may join the Nutrient Stewardship Programme (NSP) and maintain a limit of no more than 10 kg P per hectare per year (Tier 1), or if that is not possible, reduce it by at least 10% over four years or demonstrate sustainable P management under the Soil P Protocol. (Tier 2) (see proposal 4.3.1 Nutrient Stewardship Programme).
- Stay out of NSP and reduce both their N loading below 170 and their P balance by 15%.
- Stay out of NSP and reduce their N loading below 170 kg N/ha and work under the Soil P Protocol.
- Under the Soil P Protocol farms must demonstrate that weighted average soil phosphorus levels are stable or decreasing by the end of the 4 year period.

Reductions in P balance can be achieved by a range of actions, depending on individual farm circumstances. Key actions may include:

- Improvements in animal feed phosphorus efficiency
- Increased use of slurry and manure processing technologies to better manage and redistribute phosphorus
- Limit or eliminate chemical phosphorus fertiliser use
- Exporting slurry
- Farming additional land.

The Soil P Protocol can be used in instances where a farm cannot demonstrate compliance with the applicable P Balance requirement. The farm may follow the terms of the Soil P Protocol as a complementary means of demonstrating effective soil P management.

Protocols for pig and poultry farms to demonstrate sustainable management of P as a complementary means to a farmgate P Balance have also been developed.

Pig and Poultry farms which operate under IPPC licence will not be subject to the P Balance requirements as they already are required to demonstrate sustainable management of manure through Nutrient Management Plans.

This approach focuses on overall national reduction, rather than relying on a single measure, recognising that different farms will contribute in different ways.

It is important to note that improvements in water quality will not be immediate. Because phosphorus stored in soils is released slowly, meaningful changes are likely to occur over many years. However, this measure sets a clear and achievable direction of travel towards improved environmental outcomes.

Progress of this measure will be reviewed after two years and again as part of the wider NAP review, as outlined in the governance section. If progress towards the 30% reduction is not on track, further measures will be required.

The benefits of this are:

- **Reduce the amount of excess phosphorus entering agricultural systems**
- **Slow and reverse the build-up of excess phosphorus in soils**
- **Reduce phosphorus losses to rivers and lakes**
- **Support improvements in water quality and ecological condition**
- **Encourage more efficient use of nutrients**
- **Support long-term farm sustainability by reducing unnecessary inputs.**

Question 2

i. To what extent do you agree or disagree with the proposal to introduce pathways to reduce the national average phosphorus surplus by 30% from the 2024 level of 8729 tonnes over the 4 year duration of the next NAP?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to explain your answer or provide any additional comments.

4.1.3 Dairy cow nutrient excretion values - based on milk yield

Introduction

Nitrogen (N) and Phosphorus (P) excretion values for all livestock categories are used to estimate how much nitrogen and phosphorus is produced by livestock on farms. These values are an important part of how the NAP works in practice.

The Position Under 2019 NAP

The NAP Regulations currently use just one excretion value for dairy cows. This was originally set in 2006 based on an annual milk yield of 6,206 litres per cow. It was reviewed and revised in 2019 to reflect the increase in the average annual milk yield to c. 7,600 litres per cow.

Reasons for Change

- Average milk production per cow in NI is now much higher. From 2020-2023 milk output in NI increased to 8,015 litres per cow (4yr average).
- Milk yields now vary widely across dairy herds. Using one value for all farms does not reflect these differences.
- Higher milk production generally results in higher nitrogen excretion. A single value cannot accurately represent both lower- and higher-yielding systems.
- To align with methods used in the NI Ammonia Inventory.

What is being proposed

It is proposed to reform the standard nutrient excretion values for dairy cows under the NAP, by replacing the single values for Nitrogen and Phosphorus by values determined by milk yield.

The aim is to make these values more accurate and fairer by better reflecting actual excretion rates, milk yield and dietary management, while avoiding disproportionate impacts on farms close to regulatory thresholds.

This will also be replicated for Phosphorus (P) excretion values for dairy cows, and those values are also set out in Table 1. Values will be determined using a DAERA online system and calculators, with farmers entering the relevant milk yield or dietary data for their herd.

There will be four different ways to determine the nutrient excretion values for a herd. Farmers should select one of these options:

- **Milk yield banding:** This involves applying the standard nitrogen values specified for each milk yield band, with supporting records of farm milk yield.

The proposed banding and excretion values for dairy cows are:

Table 1: Nitrogen (N) and Phosphorus (P) excretion figures for dairy cows

Milk yield bands (litres)	N excretion per cow (kg/year)	P excretion per cow (kg/year)
< 5,000	77	11
5,000 - 7,000	90	13
7,001 - 8,000	103	15
8,001 - 9,000	112	17
9,001 - 10,000	121	18
10,001 - 12,000	135	20
>12,000	149	22

- **Farm-specific calculation (milk yield based):** Farms may use their own milk yield data to calculate a tailored nitrogen value, rather than the standard values provided for in the fixed band average.
- **Farm-specific calculations (diet based):** Farms may choose this option where they are using specific feeding practices (such as lower protein diets). Nitrogen excretion can be calculated by using diet information. This option must be supported by independent verification. It is only relevant for herds with higher milk yields and concentrate feed inputs. Improving N efficiency in diets will reduce N excretion rates.
- **Default value:** Farms who do not submit any data, the higher default excretion values will apply.

Data relating to milk yield should be taken from either the most recent year's average or a rolling average of the most recent three-years. This data is to be submitted to DAERA annually via an online system.

The benefits of excretion values are:

- **Provides a standard, transparent method for estimating nutrient production on farms**
- **Reduces administrative burden by avoiding the need for direct measurement of manure nutrients on every holding**
- **Allows nutrient limits to be applied fairly and consistently across all farms**
- **Helps protect water quality by ensuring that nutrient applications remain within safe limits**
- **Supports wider environmental reporting, including greenhouse gas and ammonia inventories.**

The benefits of using figures relative to milk yield are:

- **Banding better reflects real milk production and feeding practices**
- **More accurate and fair nutrient accounting, and allowing farms to use their own verified data where it is available**
- **Avoids penalising lower input systems**
- **Improves alignment with ammonia inventory data**
- **Improves precision of nutrient loading calculations**
- **Supports better targeting of nutrient reduction measures.**

For higher yielding herds the benefits of using farm specific diet based figures are:

- **Recognition of improved efficiencies**
- **Potential to lower N excretion from standard yield figures.**

Question 3

i. To what extent do you agree or disagree with the proposal to reform the standard nutrient excretion values for dairy cows under the NAP, by replacing the single values for Nitrogen and Phosphorus by banded values determined by milk yield?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to explain your answer or provide any additional comments.

4.1.4 Updated poultry nutrient excretion figures

Introduction

Poultry nutrient excretion figures are standard values used to estimate how much nitrogen (N) and phosphorus (P) poultry produce in their manure. These figures are used to calculate the nutrient loading from poultry enterprises, support nutrient management planning, and ensure that manure is applied to land at safe levels, helping to protect water quality and support compliance with environmental regulations.

The Position under the 2019 NAP

The existing standard values for nutrient excretion figures for poultry are set out in Table 2.

Table 2: Nitrogen (N) and phosphorus (P) excretion rates for poultry (NAP Regulations 2019 Reg 9 & Sch 2 Table 1c)

Livestock type	Nitrogen (N) produced per 1000 birds per crop (Kg N)	Phosphorus (P) produced per 1000 birds per crop (Kg P)
Broilers - hot water heating	33.8	7
Conventional broilers	40	8.4
Free range broilers	44.9	11.4
Turkeys(1) 0 - 6 weeks	229	55
Turkeys(1) 6 weeks - kill	305	73.8
Turkeys(1) 0 - kill	534	129
Fattening ducks	139	65

(1)Male and female turkeys

Livestock type	Nitrogen (N) produced per 1000 birds per crop (Kg N)	Phosphorus (P) produced per 1000 birds per crop (Kg P)
Broiler breeders 0 - 18 weeks	2.9	2
Broiler breeders 18 - 60 weeks	7.2	3.9
Broiler breeders 0 - 60 weeks	534	129
Pullets	4.7	1.7
Layers	12	4.6
Free range laying hens	5.4	2.2

Reasons for Change

DAERA is continually monitoring and reviewing the standard figures, and the banding used to ensure that they reflect the current production systems.

A further review of the N and P livestock excretion rates in the NAP Regulations tables relating to poultry manures across a range of poultry production and management systems identified further amendments that were required.

If these values are not accurate, this could affect nutrient management planning and compliance with the regulations. For example:

- Nitrogen loading on farms could be over- or underestimated, and
- Crop nitrogen requirements could be calculated incorrectly.

It is important that the schedules setting out poultry nutrient excretion figures are accurate and up to date, as they are used as the basis for regulatory calculations and farm decisions. Incorrect or outdated information could lead to inappropriate manure spreading, increased risk of water pollution, or unintended non-compliance with environmental rules.

What is being proposed

It is proposed that the standard values for poultry figures are amended as outlined in Tables 3 & 4 below.

As part of this review, the following amendments are recommended to the existing poultry production systems. These amendments will also improve the ease of use and read-across between regulations, guidance documents and online calculators. Changes are also proposed to the lay-out of the table in the regulations.

The amendments to the standard values for poultry figures are outlined in the following tables 3 & 4:

Table 3: Nitrogen (N) and Phosphorus (P) excretion rates for poultry (Update to NAP Regulations 2019 Sch 2 Table 1c)

Livestock type	Dry matter (%)*	Nitrogen (N) produced per 1,000 birds per crop (kg/N)	Phosphorus (P) produced per 1,000 birds per crop (kg/P)	Crop length (weeks)	Litter output per 1,000 birds per crop (t)	Litter output per 1,000 birds per week (t)
Broilers - indirect heating systems	72	30.3	5.0*	6	1.0	0.170
Free range broilers (0d - finish)	57	44.9	11.4	8	1.7	0.213
Free range broilers (0 - 28d)	65	18.6	4.4	4	0.53	0.133
Free range broilers (28d - finish	56	44.9	11.4	4	1.6	0.395
Turkeys 0 - 6 weeks	62	103.9	30.3	6	3.9	0.650
Turkeys 6 weeks - kill	59	305	73.8	8	12.3	1.538
Turkeys 0 - kill	61	408.9	104.4	14	16.2	1.157
Fattening Ducks	25	139	65	5	21.4	3.567

Livestock type	Dry matter (%)*	Nitrogen (N) produced per 1,000 birds per week (kg/N)	Phosphorus (P) produced per 1,000 birds per week (kg/P)	Crop length (weeks)	Litter output per 1,000 birds per crop (t)	Litter output per 1,000 birds per week (t)
Broiler breeders 0 - 18 weeks	55	2.9	2.0	18	3.0	0.167
Broiler breeders 18 - 60 weeks	60	7.2	3.9	42	14.7	0.350
Broiler breeders 0 - 60 weeks	58	5.9	3.3	60	17.7	0.295
Pullets	72	4.7	1.7	16	2.3	0.144
Free range laying hens - single tier	46	5.8	2.2	60	17.3	0.288
Free range laying hens - multi tier	32	6.6	2.1	60	25.3	0.422
Housed hens	31	7.4	2.3	60	29.0	0.483

*Dry matter may vary depending on litter/manure drying systems. Adjust litter/manure output and nutrient profile accordingly. As DM increases, total weight of litter manure will decrease, and nutrient content / kg will increase.

Table 4: Total Nitrogen (N) and Phosphorus (P) content of fertilisers and proportion of total phosphorus to total nitrogen (all on a fresh weight basis)

(Update to NAP Regulations 2019 Sch 2, Table 2, in so far as is relevant to poultry only)

Solid manure type	Dry matter content (%)*	Total nitrogen content by weight (kg N/t)	Total phosphorus content by weight (kg P/t)	Proportion of total phosphorus to total nitrogen
Poultry manures				
Broiler - indirect heating systems	72	30.3	5.0	0.16
Free range broilers 0d-finish	57	26.4	6.7	0.25
Free range broilers 0-28d	65	34.5	8.2	0.24
Free range broilers 28d-finish	56	28.5	7.0	0.25
Broiler breeders 0 - 18 weeks	55	17.5	11.8	0.67
Broiler breeders 18 - 60 weeks	60	20.7	11.0	0.53
Broiler breeders 0 - 60 weeks	58	19.1	11.4	0.60
Turkeys 0 - 6 weeks	62	26.6	7.7	0.29
Turkeys 6 - kill	59	24.8	6.0	0.24
Turkeys 0 - kill	61	25.7	6.9	0.27
Pullets	72	32.7	12.0	0.37
Free range laying hens - single tier	46	18.8	7.5	0.40
Free range laying hens - multi tier	32	15.6	5.0	0.32
Housed hens	31	15.4	4.7	0.31

*Dry matter may vary depending on litter/manure drying systems. Adjust litter/manure output and nutrient profile accordingly. As DM increases, total weight of litter manure will decrease, and nutrient content / kg will increase.

The benefits of this are:

- **Reflects modern poultry systems more accurately**
- **Improves regulatory clarity and planning certainty**
- **Ensures nutrient losses are properly accounted for**
- **Reduces risk of under estimated nutrient pressures.**

Question 4

i. To what extent do you agree or disagree with the proposed amendments to standard values for poultry nutrient excretion figures (N and P)?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to explain your answer or provide any additional comments.

4.1.5 Standard values for separated manures and slurries

Introduction

There are two main ways to separate slurry into solid and liquid parts:

- Settling - by letting the heavier fractions settle to the bottom, or
- Forced separation - by forcing the mixture through a screen.

Settling is sometimes done within tanks or lagoons. Forced separation uses devices like screens, presses or centrifuges. The most popular of these is the screw press, mainly because it is easier to use, takes up little space, needs little maintenance and is more affordable.

Position under 2019 NAP

There are currently three standard values under the current NAP Regulations for separated cattle slurries liquid portion and one value for the solid portion (Table 2 of Schedule 2), which are shown in Table 5 below:

Table 5: Extract from the 2019 NAP Regulations for Separated Cattle Slurries (NAP Regulations 2019 Sch 2 Table 2)

Separated Cattle slurries (liquid portion)				
Solid Manure Type	**Dry Matter content (%)**	**Total nitrogen (N) content by Volume (kg N/m3)***	**Total phosphorus (P) content by volume (kg P/ m3)***	**Proportion of total phosphorus to total nitrogen**
Strainer box	1.5	1.5	0.13	0.09
Weeping wall	3	2.0	0.22	0.11
Mechanical Separator	4	3.0	0.52	0.17
Miscellaneous manures				
Solid Manure Type	**Dry Matter content (%)**	**Total nitrogen content by weight (kg N/t)**	**Total phosphorus content by weight (kg P/t)**	**Proportion total phosphorus to total nitrogen**
Separated cattle slurry (solid portion)	20	4.0	0.87	0.22

Reasons for change

Industry practices have changed with screw press separation now being the most used method of forced filtration.

There is a need to recognise that nutrient content in separated slurry can vary due to differences in:

- Separation systems
- Materials in the slurry
- Storage methods
- On-farm management practices.

The industry change to screw press separation needs to be reflected in current legislation to allow farmers to use accredited, farm-specific analysis to help:

- Improve the accuracy of nutrient planning
- Avoid mistakes in nutrient applications or exports
- Reduce risks to crop performance and the environment.

Overall, the change supports a more reliable, evidence-based and practical approach for farmers. As a result, DAERA is proposing to make the following amendment.

What is being proposed

It is proposed to update the regulations to include a standard value for screw press separated slurry fractions as set out in Table 6 & 7.

AFBI have provided the following data on separated liquid and solids respectively. DAERA proposes to include in the Regulations the mean as a standard value for screw press separated slurry fractions.

Table 6: Separated liquid from screw press separation of cattle slurry

Separated liquid source	Dry matter content	Total Nitrogen (N) (kg N/m³)	Total phosphorus (P) (kg P/m³)	P:N ratio	Source
Separated liquid from 8% DM dairy slurry	6	3.5	0.6	0.17	AFBI data
Separated liquid from 7.8% DM dairy slurry	5.2	3.8	0.6	0.16	Fournel et al. 2019
Separated liquid from 6.3% DM dairy slurry	5	3.5	0.58	0.17	Fournel et al. 2019
Separated liquid from 8.6% DM cattle slurry	4.3	3.75	0.34	0.09	Fangueiro et al. 2008
Mean values	**5.1**	**3.64**	**0.53**	**0.15**	**Calculation**

Table 7: Separated solids from screw press separation of cattle slurry

Separated solid source	Dry matter content	Total Nitrogen (N) (kg N/m³)	Total phosphorus (P) (kg P/m³)	P:N ratio	Source
Separated solid from 8% DM dairy slurry	23.7	4.8	1.21	0.25	AFBI data
Separated solid from 7.8% DM dairy slurry	24.3	4.85	1.27	0.26	Fournel et al. 2019
Separated solid from 6.3% DM dairy slurry	26.2	4.81	1.36	0.28	Fournel et al. 2019
Mean values	**24.7**	**4.82**	**1.28**	**0.27**	**Calculation**

DAERA intends to retain the values for strainer box and weeping wall standard values as these may still be in use on some farms.

Due to the variety of feedstocks for Anaerobic Digestate (AD) and consequent variability of digestate, no standard values are proposed. A specific nutrient content analysis should be used and provided as required by the existing regulations.

The benefits of this are:

- **Improves the accuracy of nutrient planning**
- **Supports slurry separation and nutrient processing investment**
- **Provides regulatory certainty for new technologies**
- **Supports environmental protection by promoting better nutrient use**
- **Enables effective phosphorus removal from high risk areas**
- **Reduces land loading of excess nutrients.**

Question 5

i. To what extent do you agree or disagree with updating the regulations to include standard values for screw press separated cattle slurry fractions (liquid and solids)?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to explain your answer or provide any additional comments.

4.1.6 Updated chemical nitrogen fertiliser limits for grassland

Introduction

For effective nutrient management it is essential that the correct amount of nitrogen is applied at the correct time. Most agricultural soils do not contain enough readily available nitrogen to meet the needs of growing crops; therefore, nitrogen inputs are necessary. To make the best use of nitrogen, fertiliser and organic materials should be applied when crops are growing most - generally spring and early summer. Depending on the conditions at the time of application or in the days immediately after, a high percentage of the nitrogen applied through fertiliser and slurry can be lost via ammonia and nitrous-oxide emissions.

Position Under 2019 NAP

Under the current NAP regulations (Regulation 10 & Schedule 2 table 4), application of nitrogen fertiliser to grassland each year is limited to 272 kg N for Dairy Cattle and 222 kg N for Other Livestock per hectare of agricultural area.

The Dairy cattle limit applies where more than 50% of the livestock manure applied both by land application and by the animals themselves, arises from dairy cattle. In all other cases the figure for other livestock applies.

Reasons for Change

- Encouraging fertiliser use to better reflect actual grass growth and soil need
- Reducing the risk of excess nitrogen being lost to the environment
- Supporting more efficient nutrient planning at farm level
- By linking nitrogen fertiliser limits to grass production and Nutrient Management Planning, the approach seeks to ensure that
    - Higher nitrogen use is supported by evidence, and
    - Nutrients are applied more accurately and efficiently.

What is being proposed

It is proposed to introduce whole farm limits on chemical nitrogen fertiliser use, based on how much grass a farm produces - See table 8

Table 8: Whole farm limits on chemical nitrogen fertiliser use, based on how much grass a farm produces

Nitrogen application limits for Grassland Crops Grass Production Level	Balance of grassland nitrogen requirement (from chemical fertiliser or organic nitrogen supply other than livestock manure) Whole farm limits - kg/N/ha/year
Maximum - Target yield 12-15 (t DM/ha)	243 - 272
Moderate to High - Target yield 10-12 (t DM/ha)	223 - 242
Low to Moderate - Target yield 5-10 (t DM/ha)	0 - 222

DAERA has reviewed the existing values in the regulations for effective nutrient management to ensure the correct amount of nitrogen is applied at the correct time.

The revised values seek to introduce whole-farm limits on chemical nitrogen fertiliser use, based on how much grass a farm produces. The table in the existing regulations will be replaced with the values above, based on grassland production. Values are based on the latest available data, including local research and the UK Fertiliser standards (RB209, 2026)[1].

- Each production level would have a maximum allowable amount of nitrogen from chemical fertiliser (and from organic nitrogen sources other than livestock manure), expressed as kilograms of nitrogen per hectare per year.
- Higher fertiliser limits would only be available to farms that can demonstrate higher grass production.

These proposed limits are intended to better match nitrogen use with what crops can realistically use and need.

High yields of grass forage

Many farms in NI are generally able to produce multiple crops of grass forage. With efficient grassland management, precision nutrient application and optimal soil pH, very high yields can be produced if sufficient nitrogen fertiliser is applied.

Increased forage production reduces the need for concentrate feeds that contribute to phosphorus surplus both at individual farm and national level.

Nitrogen Requirements

To support higher levels of forage production and use, these farms typically need sufficient nitrogen inputs. Comprehensive local growth trials have demonstrated the proposed limits in Table 8 will enable grass production to the agronomic optimum.

Additional Requirement for High-Production Farms

Farms in the maximum grass production category will have an additional requirement to support the higher nitrogen allowances.

These farms would be required to:

- Carry out soil sampling and analysis at least every four years
- Sample each homogeneous grassland area (areas with similar soil type and management)
- Test, as a minimum, for:
  - Phosphorus (P),
  - Potassium (K), and
  - Soil pH.

This soil testing must follow the procedures already set out in Schedule 5 of the 2019 NAP Regulations.

The benefits of this are:

- **Improve nutrient efficiency at whole-farm level**
- **Reduce unnecessary nitrogen inputs where grass production is lower**
- **Support better environmental outcomes while maintaining productive farming systems.**

Question 6

i. To what extent do you agree or disagree with introducing whole-farm chemical nitrogen limits linked to grass production levels?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to explain your answer or provide any additional comments.

4.1.7 Allowance for processed organic fertilisers

Introduction

Slurry and manure contain valuable nutrients that support grass growth, but if they are not managed carefully, excess nutrients can be lost to water and air. Processing slurry and manure, for example by separation or treatment, can help better match nutrient supply to grass growth needs and reduce nutrient surpluses. Processed organic fertilisers produced by further treating these materials can also be used to replace chemical fertilisers, helping to recycle nutrients more effectively, improve nutrient use efficiency and reduce the risk of environmental pollution.

Position Under 2019 NAP

There is no specific allowance or limit for processed organic manures within the existing 2019 NAP Regulations.

Reasons for Change

It is likely that there will be a growing supply of these fertilisers due to increased investment in manure and slurry processing, including support through research and innovation programmes.

Restricting the allowance to agricultural sources only is intended to reduce the risk of contaminants, such as heavy metals, entering the food and farming system.

What is being proposed

It is proposed to introduce a specific allowance and limit of 100 kg nitrogen per hectare per year for "Processed Organic Fertilisers" derived from agricultural sources.

Under this proposal:

- These fertilisers would be classified separately from livestock manure
- They will count towards the limit for chemical fertiliser or organic nitrogen supply other than livestock manure
- The current total N Fertiliser application limit will not be increased, and must continue to be applied to crop need
- Processed is defined as chemical and/or heat treatment and excludes simple mechanical processing such as pelleting or composting
- Only processed organic fertilisers derived from agricultural sources would be allowed within the definition of "Processed Organic Fertilisers".

The benefits of this are:

- **Support more efficient and sustainable nutrient use on farms**
- **Reduce reliance on chemical nitrogen fertilisers without increasing overall fertiliser use**
- **Supports the processing of slurry and manure to remove excess nutrients**
- **Help protect water quality and reduce air emissions**
- **Safeguard against over-application of phosphorus through existing controls, including farm phosphorus balance limits and measures for high-phosphorus manures**
- **Encourage the use of processed organic fertilisers instead of chemical fertilisers**
- **Help reduce nitrogen and phosphorus surpluses at a national level**
- **Promote a low emissions, circular economy, reducing impacts on air quality, water quality, and greenhouse gas emissions**
- **Organic nutrient processing can facilitate LESSE through the removal of slurry solids from farms for off farm processing. This reduces on farm slurry dry matter and makes LESSE easier to use.**

Question 7

i. To what extent do you agree or disagree with the proposal to introduce a specific allowance and limit of 100 kg nitrogen per hectare per year for "Processed Organic Fertilisers" derived from agricultural sources.

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to explain your answer or provide any additional comments.

4.2 Manure Storage and Application Requirements - Ammonia Implications

4.2 Manure Storage and Application Requirements - Ammonia Implications

The way slurry and other organic manures are stored and applied has an important impact on both water quality and air quality. If not managed carefully, nutrients can be lost to rivers, lakes and the wider environment, and valuable nutrients can also be lost from the farm system.

Agriculture is by far the main source of ammonia (NH_3) emissions, accounting for around 97% of total emissions in NI[14]. Ammonia losses can occur from the storage and spreading of slurry and fertilisers. Reducing these losses is important to protect the environment and to make better use of nutrients on farms.

This section focuses on improving how manures are stored, handled and applied, alongside measures to reduce ammonia emissions. The proposed measures are designed to support a more effective and consistent approach by:

- Improving how and when slurry is applied
- Promoting the use of lower emission spreading methods
- Ensuring slurry storage is planned and managed effectively
- Reducing emissions from fertiliser use
- Improving the management of materials such as anaerobic digestate.

These proposals aim to balance environmental protection with practical implementation. They also take account of the need for a phased approach, allowing farmers time to adapt and supporting changes through guidance and financial support where available.

Together, these measures are intended to:

- Reduce nutrient run-off to water
- Lower ammonia emissions to air
- Improve nutrient use efficiency
- Support sustainable farming practices.

The following sections set out the detail of each proposed measure.

Proposed Measures

4.2.1	**Reduced slurry application volumes in February and early October**
4.2.2	**Clearer definition of Low Emission Slurry Spreading Equipment (LESSE)**
4.2.3	**Tiered move to increased use of LESSE**
4.2.4	**Pre-Notification of new slurry and silage storage**
4.2.5	**Clarify cover requirement for new above-ground slurry stores**
4.2.6	**Limit the use of unprotected granular urea fertilisers**
4.2.7	**Anaerobic Digestate Measures**

14 Air Pollutant Inventories for England, Scotland, Wales and Northern Ireland: 2005-2023, p.69 DA GHG Inventory 1990-2023 Report.

4.2.1 Reduced slurry application volumes in February and early October

Introduction

During the period of 1st to 15th October and throughout the month of February lower soil temperatures and wetter conditions mean daily grass growth is typically lower and contributes to reduced nutrient uptake. Additionally, unpredictable weather increases the likelihood of nutrients not being fully utilised and instead being lost through run-off into watercourses.

The Position under the 2019 NAP

At present, the quantity of slurry that may be spread during the period of 30th September to 15th October, and during the month of February is restricted to 30m^3 per hectare per single application.

Reasons for Change

This is so that the nutrients supplied by the slurry better reflect the expected grass growth that can normally be achieved through nutrient applications during these months.

To reduce likelihood of nutrients being lost through run-off into nearby water courses.

What is being proposed

It is proposed that the maximum volume of slurry which can be applied during the month of February and the period of 30th September to 15th October is reduced from the current limit of 30m^3 per hectare per single application to 25m^3 per hectare per single application.

The benefits of this are:

- **Improved nutrient uptake at times of lower growth: Better aligns slurry application rates with lower grass growth and nutrient demand in February and early October**
- **Reduced risk of nutrient run-off: Lower application volumes reduce the likelihood of nutrients being lost to watercourses during wetter conditions**
- **Enhanced water quality protection: Helps reduce diffuse pollution pressures on rivers, lakes and streams**
- **More efficient use of slurry: Encourages nutrients to be applied at rates more likely to be effectively utilised by crops**
- **Lower environmental risk during unpredictable weather: Reduces potential losses following heavy or unexpected rainfall events.**

Question 8

i. To what extent do you agree or disagree with the proposal to reduce the maximum single application rate of slurry from 30 m^3/ha to 25 m^3/ha during the month of February and the period of 30th September to 15th October?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.2.2 Clearer definition of Low Emission Slurry Spreading Equipment

Introduction

Low Emission Slurry Spreading Equipment (LESSE) refers to slurry spreading methods that reduce ammonia emissions compared to traditional splash plate spreading methods. Ammonia emissions from slurry spreading contribute to air pollution and can harm the environment, including water quality and biodiversity. These emissions also are a loss of valuable nitrogen, which reduces nutrient efficiency and increases the need for purchased chemical fertilisers.

Position under the 2019 NAP

LESSE is currently defined in the 2019 Regulations as: equipment which is used to spread slurry by bandspreading, dribble bar, trailing hose, trailing shoe, soil incorporation or soil injection methods.

Reasons For Change

The current definition of what counts as LESSE in the regulations is not as clear or as consistent with wider UK and international standards as it could be. This can create uncertainty about which slurry spreading methods meet the requirements.

What is being proposed

It is proposed to update and clarify the definition of LESSE in the regulations.

Under the proposed definition, LESSE will be expanded to include:

- **Any method that reduces ammonia emissions by 30% or more compared with the inverted splash plate method.**

What slurry spreading methods would be covered?

The best-known examples of LESSE currently include:

- Trailing hose (also known as dribble bar)
- Trailing shoe
- Injection systems.

Under the proposed definition, these methods would continue to be recognised. In addition, new or alternative technologies may also qualify if they meet the emissions reduction criteria (of reducing ammonia emissions by 30% or more) and are supported by scientific evidence.

This approach avoids limiting LESSE to a fixed list of equipment types and instead focuses on environmental performance.

The benefits of this are:

- **Improved environmental protection, particularly by reducing ammonia emissions**
- **Fairness and consistency in how the rules are applied**
- **Encouragement of innovation by allowing new slurry spreading technologies to be recognised where they deliver proven environmental benefits**
- **Greater certainty for farmers and contractors about which equipment meets regulatory requirements.**

Question 9

i. To what extent do you agree or disagree with the proposal to update and clarify the definition of Low Emission Slurry Spreading Equipment?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.2.3 Tiered move to increased use of LESSE

Introduction

Spreading slurry using low emission spreading techniques has been an important part of government policy on reducing the impact of farming on the environment for several years.

Position under the 2019 NAP

LESSE is currently mandatory for certain higher impact farming activities, including:

- Farms with more than 200 cattle livestock units (LU)
- All slurry spreading contractors
- Anaerobic digestate
- Large pig farms (producing 20,000 kg or more of manure nitrogen per year.)
- Derogated farms when spreading slurry from 15 June each year.

Other farms may choose to use LESSE voluntarily but are not currently required to do so.

Reasons for Change

DAERA must demonstrate compliance with statutory ammonia emissions targets and LESSE is a key enabler. AFBI projections of ammonia emissions have demonstrated that, based on existing emission factors, implementation of low emission slurry spreading techniques would achieve by itself a 5 to 10% reduction in total ammonia emissions across NI agriculture.

AFBI Research on grassland productivity has shown that low emission slurry application can increase grass growth by 18% and 26% for trailing hose and trailing shoe respectively.

Inorganic nitrogen fertiliser rates for grass silage crops can be reduced by up to 38kg/ha when typical rates of slurry are applied by trailing shoe.

What is being proposed

It is proposed to extend the mandatory use of LESSE to more farms over time, using a tiered approach based on farm size, measured in livestock units.

Under the proposal, LESSE would become mandatory as set out in Table 9.

Table 9: Proposed LESSE tiers to 2030

	Livestock Unit per farm	Proposed date of Mandatory LESSE
Tier 1	All farm businesses over 100 LU	by February 2028
Tier 2	All farm businesses over 75 LU	by February 2029
	All pig farms over 10,000kg livestock manure N production per year from pigs.	by February 2029
Tier 3	All farm businesses over 50 LU	by February 2030

This will mean a gradual increase in LESSE use across NI, with the largest farms required to change first. The tiered approach is intended to balance environmental benefits with practical considerations for farmers.

DAERA recognises that moving to LESSE is not without challenges. Cost, field access, ground conditions, equipment availability, and reliance on contractors all affect what is practical on different farms. Farming systems and land types vary across NI, and these proposed changes take this into account. It is intended that this measure will be introduced alongside financial support for LESSE under Sustainable Farming Investment Scheme.

Where it is not practical to spread on a field using LESSE due to slope existing exemptions will apply as specified in the 2019 NAP Regulations.

Subject to the outcome of this consultation this measure will be incorporated into the Ammonia Strategy.

The benefits of this are:

- **Reduced ammonia emissions, improved air quality and increased protection for sensitive habitats**
- **Reduced nutrient run-off, helping safeguard waterways from pollution**
- **Promotion of efficient nutrient uptake by crops, lessening environmental losses**
- **Enhanced nutrient planning efficiency. Enhanced sustainable farming practices by maximising the value of slurry as a nutrient resource**

The benefits of this are:

- **Improved grass growth and crop yield by keeping more nitrogen in the soil**
- **Reduced need for chemical fertilisers, lowering input costs**
- **More effective use of slurry nutrients, increasing overall farm productivity.**

Question 10

i. To what extent do you agree or disagree with the proposal to extend the mandatory use of LESSE to more farms over time, using a tiered approach based on farm size, measured in livestock units?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.2.4 Pre-Notification of new slurry and silage storage

Introduction

Safe storage of slurry is a key requirement in NI because it protects water quality, air quality, animal health, and public safety. The need for formal design, planning approval, and certification by a Chartered Structural or Civil Engineer reflects the risks involved if slurry storage fails or is poorly designed.

Position under the 2019 NAP

Currently, all new or substantially modified slurry or silage stores are required to be notified to DAERA 28 days prior to use.

Reasons for Change

The current notification arrangements do not provide enough assurance that slurry and silage stores have been properly designed and built.

At present, notification happens close to when the store is ready for use. By this stage:

- The store is usually already constructed
- Key design and construction decisions have already been made
- Any faults or weaknesses may be difficult, costly, or impossible to correct.

This limits the ability to prevent problems before they occur.

Changing the notification arrangements will mean that DAERA can consider the location and design of the facility and in doing so enable any modifications to be made prior to construction beginning.

It will also provide DAERA with assurance that the facility meets industry standards if it has obtained appropriate signoff.

What is being proposed

It is proposed to strengthen the regulatory requirement for pre-notification of slurry or silage stores prior to construction. Controllers must notify DAERA 28 days before construction (including substantial enlargement or substantial reconstruction) begins and provide the registration number of the Chartered Structural or Civil Engineer supervising and certifying the building works. If no acknowledgement is provided by DAERA within 28 days following notification, construction can proceed.

This amendment aligns NI with England and Wales, where notification is required 14 days before construction begins. However, we propose to retain the 28 days pre-notification period. If no acknowledgement is provided by DAERA within 28 days following notification, construction can proceed.

Construction, substantial enlargement or substantial reconstruction of slurry or silage storage systems must be pre-notified 28 days prior to construction work beginning. Where such a system must comply with British Standard 5502, this must be signed off by a Chartered Structural or Civil Engineer. Welsh and Scottish guidance require certification by an Engineer, so this amendment enhances regulatory assurance as set out in current regulations.

Controllers will no longer be required to notify DAERA prior to use.

The benefits of this are:

- **Strengthens environmental protection by identifying and addressing potential pollution risks before construction begins**
- **Improves assurance that slurry and silage stores are properly designed and constructed in line with required standards, including BS 5502 where applicable**
- **Reduces the risk of structural failure, leaks and future remedial works through independent professional oversight**
- **Provides clarity and consistency for farmers by setting out a clear pre-construction notification requirement**
- **Enhances regulatory alignment with other UK administrations while maintaining a proportionate 28-day notification period.**

Question 11

i. To what extent do you agree or disagree with the proposal to strengthen the regulatory requirement for pre-notification of slurry or silage stores construction?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.2.5 Clarify cover requirement for new above-ground slurry stores

Introduction

Covers are required for new above-ground slurry stores to reduce ammonia emissions, protect water quality, improve storage efficiency, and retain valuable nutrients, while helping NI meet its environmental and air quality obligations.

Position under the 2019 NAP

There is already a requirement for new above-ground slurry stores to be covered. However, the type of cover intended by this requirement has not always been consistently understood.

Reasons for the Change

It is not proposed to change the regulatory requirements but to provide clarification, through guidance and awareness to:

- Improve understanding of what the current rules already require, and
- Ensure new slurry stores are designed and built in a way that effectively reduces pollution.

Research and practical experience show that tight, fitted covers are the most effective and practical way to reduce ammonia emissions from slurry stored in tanks or silos. These covers can reduce ammonia emissions by up to 80%, helping to protect air and water quality.

What is being proposed

It is proposed to clarify through guidance and awareness raising that for new above ground slurry storage facilities, the cover must be:

- **A tensioned fitted cover (for example, a properly fitted membrane designed to remain in place), or**
- **A fixed structure (such as a roof or lid).**

Other cover types that are loose-fitting or not fixed in place are not considered to meet the existing requirement.

The benefits of this are:

- **Improved Nitrogen retention in slurry**
- **Reduce ammonia emissions from slurry storage**
- **Contribute to improved air and water quality**
- **Provide greater clarity for farmers and developers when planning and constructing new slurry stores.**

Question 12

i. To what extent do you agree or disagree with the proposal to clarify the cover types for new above-ground slurry storage facilities?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.2.6 Limit the use of unprotected granular urea fertilisers

Introduction

Urea is a highly concentrated chemical nitrogen fertiliser which has an NPK (nitrogen- phosphorus-potassium) ratio of 46-0-0. When it is spread on land without any form of protection, a significant proportion of the nitrogen can be lost to the air as ammonia gas shortly after application. Agriculture is by far the main source of ammonia (NH_3) emissions, accounting for around 97%of total emissions in NI [15]. A large proportion of this comes from the use and handling of nitrogen fertilisers and livestock manures. When products such as unprotected granular urea are spread on land in the wrong conditions, nitrogen can be rapidly lost to the air as ammonia gas.

These emissions have important environmental impacts. Ammonia contributes to air pollution and, when deposited back onto land and water, can lead to nutrient enrichment (eutrophication) and damage to sensitive habitats. This can reduce biodiversity, harm plant species adapted to low-nutrient conditions, and contribute to the formation of fine particulate matter in the air, which also affects human health.

Position under 2019 NAP

The existing regulatory requirements are not prescriptive to urea, the requirements are general to nitrogen fertilisers, relating to both organic and chemical fertilisers.

Reasons for Change

The current ammonia inventory recognises that scientific evidence shows a 70% reduction in ammonia emissions can be achieved by switching from straight urea fertiliser to protected urea. Whilst urea use is not widespread throughout NI and represents approximately 10% of all fertiliser use, there is still potential for a notable saving in ammonia and reduction in the loss of expensive plant available Nitrogen.

Ammonia contributes to:

- Poor air quality
- Damage to sensitive habitats, and
- Nitrogen pollution when redeposited elsewhere.

Ammonia losses from unprotected urea are highly variable and difficult to manage, as they depend more on short-term weather and soil conditions than on the time of year. Research carried out on the use of unprotected urea fertiliser in NI and Ireland has shown that:

- High ammonia losses can occur even in early spring under dry conditions
- Seasonal rules alone are therefore not a reliable way to control emissions.

It is recognised that farmers only using urea in optimal conditions can minimise losses maximise N efficiency on farm.

Protected urea has been shown to:

- Reduce ammonia losses by a large margin compared to unprotected urea,

15 Air Pollutant Inventories for England, Scotland, Wales and Northern Ireland: 2005-2023, p.69 DA GHG Inventory 1990-2023 Report.

- Retain more nitrogen in the soil for crop uptake, and
- Perform similarly to other commonly used fertilisers in terms of grass yield and nitrogen efficiency.

Impact of protected urea

While moving to 100% protected urea throughout the year was considered, the NAPSTFG agreed to follow a seasonal approach to balance the environmental benefits with the additional costs of protected urea.

What is being proposed

It is proposed that the use of urea fertiliser in NI would be managed through a seasonal approach, with a requirement to only use protected urea for applications from 01 April each year.

Protected urea: urea fertiliser treated with a urease inhibitor (or equivalent treatment) to reduce ammonia emissions following application.

Unprotected urea: urea fertiliser without such treatment.

Across Great Britain (GB), an industry-led stewardship approach has been introduced to reduce ammonia emissions from urea fertilisers. This approach is delivered through farm assurance standards and advisory support, and combines:

- Seasonal restrictions on the use of untreated (unprotected) urea, and
- A requirement to use protected (inhibited) urea during the main growing season.

It is proposed that NI adopt a similar approach to the GB stewardship model.

Restricted use of unprotected granular urea

Under this proposal, unprotected (uninhibited) granular urea fertiliser can only be applied during a limited application window:

- 1 February to 31 March (inclusive).

Outside of this period, the use of unprotected granular urea is prohibited.

Requirement to use protected granular urea

For the remainder of the year:

- 1 April to 15 September.

all granular urea-containing fertilisers would be required to be:

- Protected (i.e. treated with a urease inhibitor (or equivalent treatment), and
- Applied in accordance with good nutrient management practice.

Record-keeping and compliance

Farmers would be required to maintain records to demonstrate compliance, including:

- The type of granular Urea fertiliser used (protected or unprotected)
- Date of application
- Application rates and fields where applied.

The effectiveness of this measure, including assessment of compliance, will be reviewed after two years and again as part of the wider NAP

review, as set out in the governance section, and if necessary further action will be considered.

Subject to the outcome of this consultation this measure will be incorporated into the Ammonia Strategy.

The benefits of this are:

- **A substantial reduction in ammonia emissions from chemical fertiliser use**
- **Improved nitrogen use efficiency, so more of the applied fertiliser benefits crop growth rather than being lost**
- **Contribution to wider environmental objectives through the NAP.**

Question 13

i. To what extent do you agree or disagree with the proposal that the use of urea fertiliser in NI would be managed through a seasonal approach requirement to only use protected urea for applications from 01 April each year?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.2.7 Anaerobic Digestate Measures

Introduction

Anaerobic Digestate (AD) is already used across NI with around 80 plants in operation. While AD produces renewable energy, it does not remove phosphorus or nitrogen unless it is supplemented with nutrient processing technology. These nutrients remain in the digestate, are in more available forms and must be carefully managed to avoid environmental harm.

Position Under 2019 NAP

The current NAP rules include controls on the land spreading, storage and records relating to digestate.

Reasons for change

The current rules can discourage AD plants from using phosphorus rich materials such as separated slurry solids. This makes it harder to move surplus nutrients away from farms that have too much phosphorus, slowing down the development of new technologies and approaches for treating, reusing or exporting nutrients outside of NI.

DAERA's early findings from Pilot Projects under Sustainable Utilisation of Livestock Slurry (SULS) show that slurry can be separated on farm into liquid and solid fractions. These projects also demonstrate that phosphorus rich solids can be transported to AD plants for processing and that the digestate can be further treated to create products that are easier to manage and move to where nutrients are needed.

What is being proposed

It is proposed that the NAP rules are updated as follows:

Separation of Digestate to reduce Phosphorus content

- **Where the separated liquid portion of digestate has a low phosphorus to nitrogen ratio (1:10 or lower), it can be spread under the existing rules for cattle slurry.**
- **If the digestate is produced using feedstock sourced from outside NI, it must be applied strictly in line with crop nutrient needs and will require nutrient management plan completed and retained on farm.**

Targeted application of Digestate to Land

- **Where the separated liquid portion has a higher phosphorus to nitrogen ratio than 1:10, then it must be applied strictly in line with crop nutrient needs and a nutrient management plan must be completed and retained on farm, as required by the 2019 NAP Regulations.**

Record keeping and reporting of nutrient movements

- **The movements of AD must be recorded in the same way that slurry and manure imports and exports are recorded. This includes recording slurry and separated slurry from farms to AD plants, as well as processed digestate returning to farms. All movements must be notified to DAERA to allow oversight just as with manure imports and exports. Further details available in section 4.4.1 and 4.4.2.**

These updates will support better reporting of processing of slurry and manure through AD, removal of excess phosphorus, and sustainable management of digestate.

The benefits of this are:

- **Encourages circular nutrient use**
- **Provides alternatives to chemical fertiliser**
- **Supports reduction in nutrient surpluses**
- **Encourages low emission nutrient recycling.**

Question 14

i. To what extent do you agree or disagree with the proposed updates to the NAP rules for anaerobic digestate?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.3 Farming Practices to Improve Nutrient Use and Water Quality

4.3 Farming Practices to Improve Nutrient Use and Water Quality

Improving how nutrients are managed on farms is essential to protecting water quality while maintaining productive and sustainable agriculture. Day-to-day farming practices play an important role in how nutrients such as nitrogen and phosphorus are used, and how much is lost to the environment.

This section focuses on practical approaches that support better nutrient use at farm level. It sets out proposals that aim to improve efficiency, encourage good practice, and provide a clearer structure for how nutrient management is supported and monitored over time. The approach recognises that lasting improvement will require a combination of action by farmers, supported by advice, guidance and clear frameworks.

The proposed measures are designed to:

- Support farmers to use nutrients more efficiently
- Reduce losses of nutrients to water and air
- Encourage a more coordinated, long-term approach to nutrient management
- Ensure that action is targeted where it will have the greatest impact.

This section brings together three key areas:

- A revised approach to the current derogation, through the proposed Nutrient Stewardship Programme which is aimed at longer-term improvements and bringing farms on a journey towards greater nutrient efficiency to eliminate impacts on the environment.
- A more focused, catchment-based approach to improving water quality in higher-risk areas.
- The development of a Nutrient Efficiency Roadmap to guide longer-term improvements across the sector.

Together, these proposals aim to support a more joined-up and practical approach to nutrient management, helping to deliver improvements in water quality while supporting the future sustainability of farming in NI.

The following sections provide further detail on each of these proposals.

Proposed Measures

4.3.1	**Nutrient Stewardship Programme - a revised approach to Derogation**
4.3.2	**Mitigation Measures for late harvested arable crops**
4.3.3	**A focused approach to improving water quality**
4.3.4	**Nutrient Efficiency Roadmap for NI farming**

4.3.1 Nutrient Stewardship Programme - a revised approach to Derogation

Introduction

In 2019 following the granting of a derogation from the Commission, law relating to derogations was transposed into domestic Regulations by the Nutrients Action Programme (Amendment) Regulations (Northern Ireland) 2019.

The derogation allows certain farms to operate under a higher N loading, provided they do not pose a greater risk to water quality than farms operating under the standard rules.

Farms operating under derogation must continue to protect water quality. All other relevant environmental legislation continues to apply to these farms.

The NI derogation is based on a scientific case in accordance with objective criteria specified in the EU Nitrates Directive. The NI case was assessed by the EU Commission and approved by the EU Nitrates Regulatory Committee, most recently in 2019 prior to EU exit. The additional requirements for farms operating under derogation were originally set by the European Commission to ensure that environmental protection standards are maintained.

Position under 2019 NAP

At present, on application, eligible farms can operate under a derogation from the standard nutrient limits set out in the NAP. This allows eligible grass-based livestock farms to apply a higher amount of nitrogen from grazing livestock manure (up to 250 kg nitrogen per hectare per year), provided they meet a strict set of conditions.

Key current requirements include:

- At least 80% of the land receiving manure must be grassland
- The farm must keep grazing livestock (such as cattle or sheep)
- The farm must prepare and submit annual nutrient plans and accounts
- Limits on phosphorus (P) surplus, soil testing requirements, and specific rules on slurry spreading and cultivation timing
- Restrictions on the use of clover and other leguminous crops
- Farms must apply every year to remain in derogation.

These requirements are intended to protect water quality while supporting productive grass-based farming.

Reasons for Change

From 2019 - 2024, the number of derogated farms has remained consistent ranging from 418 - 441 farms approved for derogation over this period.

It is largely the same farms applying from year to year with only a small turnover of farms leaving and entering. However, Table 10 demonstrates that the number of farm businesses that were operating above 170kg N/ha/year N loading is considerably more than the farms that are currently derogated. Operating at a level above 170kg N/Ha/ year N loading, without an approved derogation, is in breach of the NAP Regulations and may lead to enforcement action being taken against the farm business

by NIEA. Only grassland farms with grazing livestock which meet the eligibility criteria can apply to operate under the derogation.

Table 10 Number of farm businesses operating above the 170 kg N/ha/year limit between 2019 and 2024

Year	Number of farm businesses above 170 kg N/ha/yr post imports/ exports	Number of farm businesses above 170 kg N/ha/yr not derogated
2019	2,065	1,656
2020	2,150	1,746
2021	2,200	1,795
2022	2,245	1,849
2023	2,208	1,800
2024	2,391	1,990

Inspection results over the period 2019-2023 indicate that non-compliance rates for derogated farms are lower than non-derogated with an average of 6.6% of derogated farm businesses being breached compared to an average of 22% for non-derogated farms.

Evidence from the monitoring carried out by AFBI shows that the risk of phosphorus losses from derogated farms is less than that of non-derogated holdings.

The better nutrient management on derogated farms, with regular soil testing, annual nutrient plans and accounts, and the phosphorus balance limit means that over application of nutrients is less likely.

An aim of the NAP Review has been to identify and remove barriers that discourage farms from participating, while maintaining and enhancing environmental protection. Therefore, a more responsive and bespoke approach is being proposed to effectively manage nutrient pressures on grassland farms with grazing livestock in NI through a focus on optimal nutrient efficiency to minimise environmental risk on a greater number of participating farms.

What is being proposed

To replace the current Derogation with a revised approach called the Nutrient Stewardship Programme (NSP). While many of the existing environmental safeguards would remain, several important changes are proposed and set out below.

a) Change of Name

- The term “Derogation” would be replaced by “Nutrient Stewardship Programme”.
- This is intended to better reflect the higher standards of nutrient management required and the environmental benefits delivered as more farms are utilising nutrients more efficiently.

b) Two-Tier Structure

- Tier 1: Farms that already meet all requirements (current and new) would enter Tier 1, recognising their high level of nutrient management.

- Tier 2: Farms that do not yet fully meet all Tier 1 Phosphorus Balance requirements could enter Tier 2 and work towards Tier 1 over time, with advisory support.

c) Grassland Requirement

- The minimum grassland requirement would be reduced from 80% to 70%.
- This would allow some farms to grow more arable crops, such as cereals.
- Additional safeguards (such as buffer strips near watercourses) on some arable fields would be required to manage any risks to water quality.

d) Phosphorus Balance Rules

- Existing participants will enter Tier 1 and maintain the current limit of no more than 10 kg P per hectare per year surplus.
- New Tier 2 entrants will be permitted to join with a higher P surplus, provided they commit to reducing it by at least 10% over four years, or to 10 kg P per hectare per year.
- Compliance with the Phosphorus balance, will be assessed using a three-year rolling average, allowing for normal year-to-year variation in farming conditions.
- Compliance may also be demonstrated through soil testing showing stable or declining soil phosphorus under the Soil P Protocol.
- All farms must prepare and submit annual nutrient/fertilisation accounts, as per the existing requirements which will be checked and verified by NIEA.

e) Clover and Leguminous Crops

Current limits on clover and leguminous crops are designed to reduce risk of elevated nitrate levels in groundwaters. This is a measure historically applied by the EU due to widespread issues in some European countries. However, as most soils in NI are less vulnerable to nutrient losses than those in European countries, the following changes are proposed:

- To permit more clover and legumes which has the potential to reduce the need for chemical fertiliser and imported feed.
- Targeted safeguards will be introduced in higher-risk areas if necessary.

f) Application to the Programme

- Tier 1 farms will apply for a maximum four years, aligning with the NAP cycle, rather than applying annually. This means that those applying for entry into the scheme part way through the NAP four year review cycle will only be approved up to the end of that review period.
- Tier 2 farms will be required to apply for entry into the programme each year, to allow progress to be reviewed and monitored.
- Annual nutrient planning and reporting will be required for all participants, which will be checked and verified by NIEA.

g) Inspections, Training and Review

- Tier 1 farms, will be considered as a lower risk and will therefore have a 1% inspection rate, reflecting their higher compliance.
- Tier 2 farms will receive targeted training and advisory support on nutrient management.

- Farms in Tier 2 (considered as in-conversion) will be considered as a higher risk than those in tier 1 and therefore will have a 5% rate of inspection.
- Nutrient management accounts will continue for farms operating under the programme and will continue to be subject to monitoring and review by NIEA annually.
- Farms which are not part of the Nutrient Stewardship Programme, but which are operating over 170kg Nitrogen per hectare per year, will be considered High Risk and will be subject to the highest 10% rate of inspection.

The proposed Nutrient Stewardship Programme (NSP) will bring a greater proportion of grassland farms within a structured and monitored framework than the current derogation model. By widening participation, more farms will be operating to defined nutrient management requirements to optimise nutrient efficiency, with detailed record keeping, and increased oversight. Ensuring enhanced nutrient management across a larger cohort of farms contributes to the protection and recovery of sensitive habitats in line with DAERA's obligations under the Habitats Regulations.

Review of the measure

The level of uptake and impact of the NSP will be reviewed after two years, and again as part of the wider NAP review, as set out in the governance section. If the review concludes that the approach is not effective, then a more restrictive regulatory system will be required.

The benefits of this are:

- **Greater flexibility, recognition for compliant farms, support to improve practices, and reduced costs from better nutrient management**
- **An increased number of farms on a pathway to optimal nutrient efficiency, which should lead to lower nutrient losses, and encouragement of biodiversity-friendly farming**
- **Strengthens productive grass-based systems, showcases environmental responsibility, and boosts sustainability**
- **Support more efficient nutrient use, lower fertiliser and feed imports, and improved farm business resilience**
- **Better aligns the programme with NI soil conditions and wider agri-environmental policy goals**
- **Regular review of the NSP through the Governance structure will help to ensure benefits are delivered.**

Question 15

i. To what extent do you agree or disagree with the proposed Nutrient Stewardship Programme?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.3.2 Mitigation Measures for late harvested arable crops

Introduction

The cultivation of late harvested crops particularly maize, can create a risk of run-off, erosion and sediment movement to waterways, particularly on sloping land or where water can flow directly from the field to a nearby stream/river.

Position Under the 2019 NAP

The NAP Regulations currently provide requirements for post-harvest measures, but do not have any requirements for action at planting stage.

Reason for Change

Late harvesting limits options for establishing cover crops and a greater likelihood of rainfall into autumn increases the potential for soil erosion and run-off.

What is being proposed

To introduce specific provision on implementation of mitigation measures at planting stage supported by additional guidance.

Mitigation will be required on fields planted with late harvested crops, where there is a risk to a watercourse e.g. slope of the field, run-off pathways and proximity to a watercourse.

- **Such mitigation will be laid out in guidance.**

Examples of actions to be considered at crop establishment include:

- Ploughing an upturned outside furrow parallel with the waterway
- Inclusion of an appropriate grass filtration buffer between the crop and the watercourse.

The benefits of this are:

- **Flexibility of mitigating actions, aligning with post-harvest actions environmental protection of watercourses from soil erosion.**

Question 16

i. To what extent do you agree or disagree with the proposal to introduce mitigation measures for late harvested arable crops?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.3.3 A focused approach to improving water quality

Introduction

Assessments show that a significant proportion of habitats and species within European sites are not at favourable conservation status. Contributing factors to this unfavourable status are water pollution and nutrient deposition from a range of sources including agricultural activities.

Position Under the 2019 NAP

The NAP sets rules that apply to all farms in NI to help protect water quality from nutrient pollution, such as nitrogen and phosphorus.

While these rules apply everywhere, evidence shows that water quality pressures are not the same in all areas. In some catchments, water quality continues to decline despite existing measures.

Reason for Change

DAERA is required to take action to make sure the NAP meets legal requirements under the Water Framework Regulation and the Habitats Regulations. Evidence indicates that where additional advice and support is provided to farms to address pressures in specific catchments, this can have positive impacts on water quality, for example work done by The Rivers Trust with farms through the Sustainable Catchment Programme.

What is being proposed

To introduce a "focused approach" to support the NAP. In focused areas, it is proposed to provide additional advisory support, education and recommendations for voluntary measures to mitigate against the risk of nutrient losses to water. In doing so it will provide additional targeted support in specific high-risk catchments, alongside the existing NAP rules that continue to apply to all farms.

The focused approach is intended to ensure that:

- The right measures are used in the right places, and
- Action is concentrated where the risk to water quality is greatest.

How focused areas would be identified

Focused areas will be selected using existing monitoring and assessment data, including:

- Water quality trends in rivers and lakes
- Information on protected sites and habitats
- Evidence of rising nutrient levels
- Assessments carried out under previous NAP implementation reports, and
- Data on land and runoff risk.

This process will identify catchments where agricultural nutrient losses pose the greatest risk to water quality.

Upon being selected participants will be signposted to advisory support available to them.

What support would be offered in focused areas

The focused approach will rely on advice, education, and voluntary action, rather than additional regulatory controls.

Support will include:

- Advice and training on nutrient management and water protection
- Non-regulatory advisory farm visits
- Support to access funding or grants for practical measures such as buffer strips tree and hedge planting, and yard improvements
- Advice on techniques to manage or export excess nutrients, such as slurry separation
- Coordination between advisers to ensure consistent messages.

Advice will be delivered through organisations such as CAFRE, environmental advisors and existing catchment-based programmes.

Working with farmers

In focused areas, farmers will be invited to take part in themed peer learning groups. These groups will:

- Meet at key times of the year
- Often be hosted on participating farms
- Discuss and demonstrate practical actions that improve water quality
- Allow farmers to learn from advisers and each other
- Receive one-to-one advice as part of this support.

More general information, including water quality monitoring results, will be published on DAERA's website. Ongoing monitoring under the Water Framework Regulations and future NAP implementation reports will track progress over time.

DAERA is proposing that uptake of the focused approach measure will be voluntary. This is an opportunity to show improvement through voluntary uptake and action as an alternative to implementation by Regulation.

Review of the measure

The level of uptake and impact of this measure will be reviewed after two years, and again as part of the wider NAP review after 4 years, as set out in the governance section. If the review concludes that the approach is not effective, then a more restrictive regulatory system will be required.

The benefits of this are:

- **Improved water quality and nutrient management**
- **Targeted measures rather than blanket regulation**
- **Directs interventions where they will have greatest impact, helping to reduce environmental impacts in protected habitats**
- **Provides farmers with tailored guidance, practical support, and access to expert advice**
- **Enhance land's sustainability and safeguard natural resources.**

Question 17

i. To what extent do you agree or disagree with introducing a "focused approach" to support the NAP, through the provision of additional advisory support, education and recommendations in focused areas?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.3.4 Nutrient Efficiency Roadmap for NI farming

Introduction

Nutrients such as nitrogen and phosphorus are essential for food production, but if they are not always managed well, excess nutrients can be lost to water and air, affecting water quality, air quality, and biodiversity.

Position Under the 2019 NAP

Phosphorus use efficiency on NI farms is estimated at about 51%, which is average compared to some other intensive farming regions in Europe.

Reason for Change

There is significant scope to improve both nitrogen and phosphorus efficiency on NI farms. Improving nutrient efficiency can reduce costs for farmers, while also delivering environmental benefits, including cleaner water and air and improved biodiversity.

There is an opportunity to better coordinate existing activity and increase uptake of good nutrient management practices on farms to:

- Ensure better coordination of existing policies, schemes and advisory activity across government, industry and other organisations
- Increase education, advice, knowledge exchange and research, ensuring information is accessible and practical for farmers.

What is being proposed

To develop a Nutrient Efficiency Roadmap for NI farming, built around an overarching mission:

"To enhance food security, farm profitability, and environmental outcomes by increasing nutrient security through the efficient use of nitrogen and phosphorus on NI farms".

Work on the Roadmap will begin ahead of the next NAP period coming into effect. Its development and implementation will run in parallel, and it will be a key advisory support over the period of the next NAP.

Key features of the proposal include:

- A co-designed and co-owned roadmap, involving farmers, government, industry, environmental groups and other relevant organisations
- A focus on practical actions that can be adopted on farms now, alongside a pathway to increase uptake over time
- Use of task-and-finish groups to support delivery of specific actions
- Governance and coordination supported by DAERA, building on existing stakeholder structures.

Scope of the Roadmap

The roadmap will:

- Prioritise nitrogen and phosphorus, while recognising the importance of other factors such as soil pH and nutrients like potassium and sulphur

- Focus mainly on-farm ("pre-farm gate") actions but may include post-farm gate measures where these clearly improve nutrient efficiency
- Avoid actions that would have unjustified negative impacts on greenhouse gas emissions or carbon capture
- Place soil health at the centre of improved nutrient management.

Without a coordinated roadmap, opportunities to improve efficiency, reduce pollution and support farm profitability may be missed.

The benefits of this are:

- **Support farmers in maximising nutrient efficiency farming practices**
- **Reduce avoidable nutrient losses to air and water**
- **Improve long-term farm resilience and efficiency**
- **Demonstrate shared commitment across the sector to protecting the environment while advancing sustainable food production.**

Question 18

i. To what extent do you agree or disagree with the proposal to develop a Nutrient Efficiency Roadmap for NI farming?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.4 Utilising Technology

4.4 Utilising Technology

Digital technology can help improve how nutrients are managed across farms in NI. In particular, better systems for recording the movement of organic materials, such as slurry and manure, can support more accurate record keeping and help ensure nutrients are used where they are needed.

At present, information on these movements is collected, but it is often reported long after the event. This can make it difficult to clearly understand where nutrients are being applied and whether limits are being followed in practice. Improving how this information is recorded and reported will provide a more reliable and up-to-date picture.

DAERA is therefore proposing to improve the existing online system used to record slurry and manure movements. The aim is to make the system more accurate, timely and easier to use, while ensuring that information can be verified. This will help support fair and effective regulation, while also reducing the risk of errors or incorrect reporting.

Alongside this, changes in farming practices mean that a wider range of materials are now being moved between farms and processing facilities. These include processed slurry products and digestate (the material remaining after anaerobic digestion).

To reflect this, DAERA proposes that the system should be extended to include these materials so that all nutrient movements are recorded in a consistent way.

Together, these proposals aim to:

- Improve the accuracy of nutrient movement records
- Provide better traceability of where nutrients are used
- Support compliance with existing rules
- Reflect the increasing use of new technologies and processing methods.

These changes are intended to support both environmental protection and practical farm management, by making better use of available data while keeping the system clear and proportionate.

Proposed Measures

4.4.1	**Enhanced online system for recording slurry and manure exports and imports**
4.4.2	**Extending the system to processed slurry solids and digestate movements**

4.4.1 Enhanced online system for recording slurry and manure exports and imports

Introduction

Slurry and manure are often moved between farms to help farmers manage nutrients more effectively and make better use of organic fertilisers.

Farmers may export slurry or manure when they have more nutrients than their land needs. Others may import it where soils require additional nutrients to support crops.

Why this happens:

- To balance nutrients between farms
- To improve soil fertility
- To make better use of organic fertilisers.

Moving slurry and manure between farms supports more efficient nutrient use and helps reduce the risk of environmental impacts. Rules are in place to ensure these materials are handled and applied safely.

Position under 2019 NAP

Farms that export or import slurry and other organic manures are already required to keep records of these movements. These records include details of the quantity moved, when it was moved, the source destination and transporter. Information on exports for the previous calendar year is submitted to DAERA once a year, no later than the end of January of the following year.

Reasons for Change

Analysis of existing data shows that:

- Annual reporting leaves the potential for records to be created retrospectively without proper records to accurately track the actual volumes of organic manures transferred. There is also a potential risk of including falsified transfers that did not happen in an effort to balance nitrogen loadings on some farms.
- Very large volumes, high numbers of slurry movements and long-distance movements are being reported by some farms, raising concerns about accuracy and verification.
- Follow up checks have found cases where receiving farms reported that they did not receive the slurry reported as exported to them, or volumes received were less than reported.

Timely, verified data is needed to properly assess compliance with nitrogen limits and to focus inspections where risks are highest.

What is being proposed

The existing online system will be enhanced to ensure more up to date and accurate reporting of exports and imports of slurry and manures. Organic manure movements must be notified to DAERA as follows:

- **All organic manure movements must be notified to DAERA by the exporter three times annually as a minimum. Movements up to the end of February, June, and October must be notified by the exporter and verified by the importer no later than the end of the subsequent month.**

- **Additionally, all exports of 15 miles or greater in a straight-line distance must be notified to DAERA within five days of the transfer. Verification by the receiving farm or operator, is required within two weeks of the receiving farm or operator being notified.**
- **This notification will be by the online system which will be enhanced. An App will also be developed so that farmers can notify and verify movements using a mobile phone, providing an alternative to logging into the online system directly. A phone line alternative to the online system and App will also be available.**
- **The five day notification period for transfers of 15 miles or greater does not apply to transfers of separated slurry solids and poultry litter to licenced manure processing facilities.**
- **The 15 mile straight line distance is measured from the location of the holding where the slurry is stored/produced, if this is different from the location of the registered Farm Business ID.**
- **Under the 2019 NAP Regulations, Reg 27 (1) farmers are already required to … "keep sufficient records to allow the following information to be ascertained for any calendar year - …" Therefore, farmers should keep records of slurry movements on an ongoing basis, and these records should be available for inspection in the current year. These records could be a log kept in a notebook or documentation from a contractor or haulier. This will be highlighted in guidance for the updated NAP.**

Additional measures

- Where farms found to have submitted false or misleading information, or where there is found to be insufficient evidence to verify transfer, farms will be required to notify DAERA at least a day in advance of transfer and submit geotagged photographs as evidence of movements, on the day of transfer. These photographs must show departure from the exporting farm and spreading or unloading at the importing farm/destination.
- Where, on assessment, DAERA finds that an export has been declared to land which is unsuitable for spreading slurry or manure, such as bog or upland rough grazing, then the export will be invalid.

The benefits of this are:

- **Improve the accuracy and reliability of slurry and manure movement records**
- **Ensure movements are fully traceable, transparent and genuine**
- **Support fair and effective enforcement of nitrogen limits, including the 170 kg nitrogen per hectare limit where applicable**
- **Reduce the risk of nutrient pollution by ensuring slurry and manure is accounted for where it is actually applied**
- **Increased compliance has been noted in other regions that have previously adopted similar approaches.**

Question 19

i. To what extent do you agree or disagree with the proposal to introduce an enhanced online system for recording slurry and manure imports and exports?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.4.2 Extending the system to processed slurry solids and digestate movements

Introduction

Livestock manure slurry and digestate movements to and from AD plants and other manure processing facilities are not currently adequately monitored.

Position under the 2019 NAP

The current recording system mainly focuses on raw slurry and other organic manures moved between farms.

Reason for Change

Processed slurry products and digestate contain significant amounts of nutrients and can affect a farm's nutrient loading in a similar way as raw slurry.

In the absence of adequate recording, it is difficult to accurately manage where these nutrients are applied and whether legal limits are being met.

As anaerobic digestate and slurry processing is becoming more prevalent, the current system no longer provides an accurate picture of organic nutrient movements.

What is being proposed

The existing online system will be extended to include additional materials, such as digestate and processed slurry products, to give a more complete picture of how nutrients are managed across the region.

Therefore, exports and imports of processed slurry solids and digestates must be notified to DAERA as follows:

- **All processed slurry solids and digestate movements must be notified to DAERA by the exporter three times annually as a minimum, Movements up to the end of February, June, and October must be notified by the exporter and verified by the importer by the end of the subsequent month.**
- **Additionally, all exports of 15 miles or greater in a straight-line distance must be notified to DAERA within five days of the transfer. Verification by the receiving AD plant, manure processing facility or farm, is required within two weeks of the receiver being notified.**
- **The five day notification period for transfers of 15 miles or greater does not apply to transfers of separated slurry solids and poultry litter to licenced manure processing facilities.**
- **The additional measures for slurry and manure listed at 4.4.1 also apply.**

The benefits of this are:

- **Provide full traceability of all organic nutrient movements, not just raw slurry**
- **Ensure processed materials and digestate are properly accounted for in nutrient loading calculations**
- **Improve environmental protection by reducing the risk of unrecorded or excessive nutrient applications.**

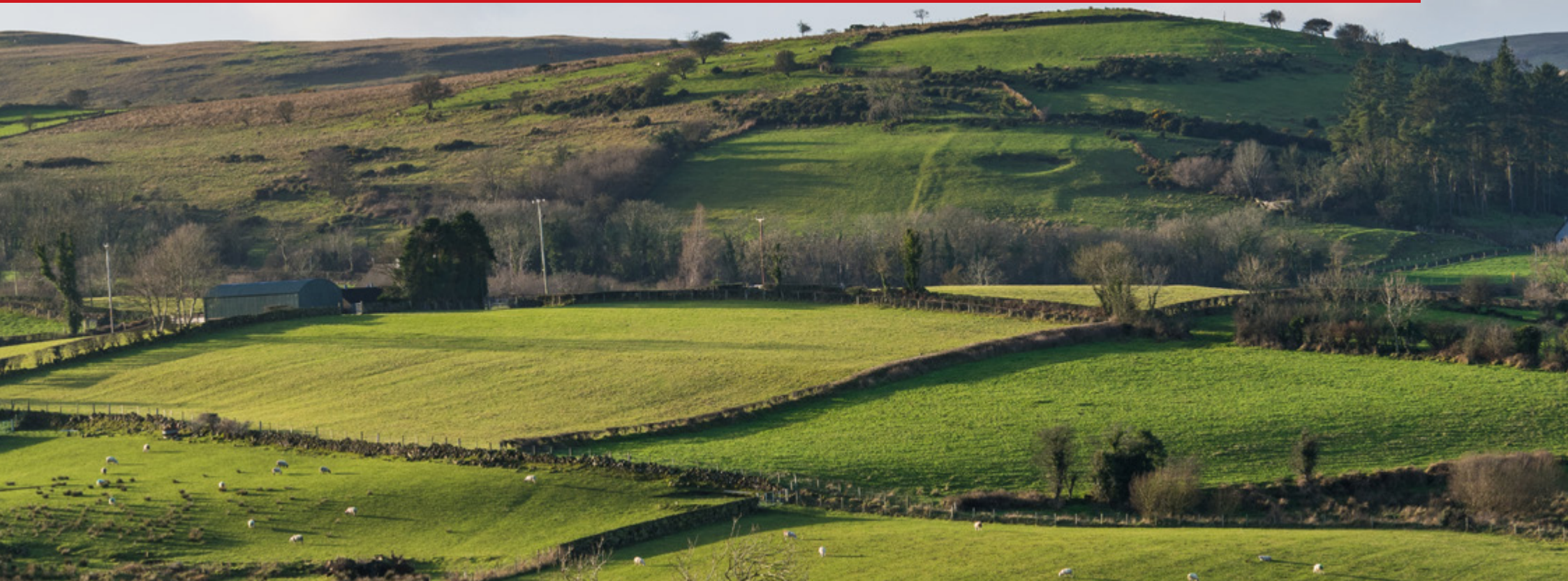
Question 20

i. To what extent do you agree or disagree with the proposal to extend the recording system to include processed slurry solids and digestate movements?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.5 Additional measures to support environmentally sustainable farming



4.5 Additional measures to support environmentally sustainable farming

Alongside the main regulatory and advisory measures set out in this consultation, there are further actions that can support improvements in water quality and the wider environment. These measures focus on practical steps that can be taken on farms to reduce the risk of pollution, improve soil and nutrient management, and encourage more sustainable farming practices.

These proposals recognise that not all improvements need to come from regulation alone. In some areas, raising awareness, sharing good practice and encouraging voluntary action can play an important role. This approach allows farmers to adopt measures that are suitable for their individual farm systems, while still contributing to wider environmental objectives.

The measures in this section focus on where small changes can make a meaningful difference. They aim to:

- Reduce the loss of nutrients and sediments to water
- Make better use of existing on-farm resources
- Improve soil health and nutrient use efficiency
- Support practical changes that can be adopted over time.

These proposals provide greater clarity on existing requirements. Together, they are intended to support farmers in managing risks in a practical and proportionate way, while contributing to improved environmental outcomes. Farmers are encouraged to avail of the services outlined in the guidance section (see Part 3).

Proposed Measures

4.5.1	**Awareness of existing storage requirements and how dirty water storage, rainwater and parlour washings can impact this**
4.5.2	**Revised silage bale storage requirements**
4.5.3	**Voluntary buffer strips on arable land**
4.5.4	**Voluntary Liming**

4.5.1 Awareness of existing storage requirements and how dirty water storage, rainwater and parlour washings can impact this

Introduction

The existing storage requirements will remain unchanged. However, climate change and other proposed changes as part of this review might affect how much storage a farm has available.

Position under the 2019 NAP

Currently, farms are required to have a minimum of 22 weeks slurry storage, unless they are a pig or poultry enterprise where they are required to have a minimum of 26 weeks.

Reason for Change

Pollution from farmyards can contribute to our poor water quality status across NI, particularly when storage capacity is not effectively managed or when there is prolonged wet weather.

What is being proposed

To raise awareness of the existing storage requirements and share best practices for making the most of on-farm storage facilities.

This will be done through advisory support, guidance and training by DAERA and other trusted advisors to raise awareness of regulatory requirements for storage requirements. This includes advice about how dirty water storage, rainwater and parlour washings can impact overall farm storage.

Advice and information will be provided on how to make the most of existing storage facilities to ease pressures on storage needs, especially during extended periods of wet weather. Guidance will cover best practices for handling and reducing the impact of dirty water, rainwater and parlour washings.

The benefits of this are:

- **Flexible, farm-specific implementation**
- **Reduces the potential for runoff from farmyards.**

Question 21

i. To what extent do you agree or disagree with the proposal to use advisory support, guidance and training to raise awareness of existing on farm storage requirements and share best practice?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.5.2 Revised silage bale storage requirements

Introduction

Pollution risks arise if effluent leaks from bales with low dry matter or when stored in unsuitable locations.

For example, placing bales in fields adjacent to a waterway, especially in areas that hold or carry water when wet, increases the risk of run-off reaching the waterway. Best practices include storing bales on higher ground away from waterways making sure they are not located in critical risk pathways, ensuring bales have sufficient dry matter and regularly inspecting storage areas for signs of run-off.

Position under the 2019 NAP

Current regulations require silage bales to be stored at least 10 m from waterways and managed to prevent seepage.

Reasons for Change

Silage bales can release silage effluent, a highly polluting liquid. Even small amounts entering a river or stream can cause serious local water pollution. Silage effluent is more than 200 times more damaging than untreated domestic sewage.

Evidence shows that:

- Silage bales stored close to waterways, or on land where runoff flows directly into watercourses, can pose a higher pollution risk.

What is being proposed

To strengthen the regulatory framework to ensure best practices are followed and to mitigate against the risk of pollution when silage bales are stored in fields.

It is proposed to include an amendment so that:

- Silage bales should not be stored in areas where there is increased risk of run-off into the waterway
- They should be stored in a manner to reduce the risk of effluent seepage and run-off to the waterway.

How silage bales are wrapped for storage and that they should not be stored within 10 metres of a waterway will remain unchanged as a minimum requirement.

The benefits of this are:

- **Prevents high impact effluent losses to watercourses**
- **Reinforces good practice while retaining existing minimum requirements, including the 10-metre setback from waterways**
- **Provides clearer expectations for silage bale storage in fields, supporting consistent compliance and enforcement**
- **Supports improved water quality outcomes, particularly in areas already under pressure from nutrient and organic pollution.**

Question 22

i. To what extent do you agree or disagree with the proposal to strengthen the regulatory framework to ensure best practices are followed and to mitigate against the risk of pollution when silage bales are stored in fields?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.5.3 Voluntary buffer strips on arable land

Introduction

When arable land is cultivated up to the edge of rivers, streams, and other water bodies, bare soil can be exposed, which increases the risk that soil and nutrients may be washed directly into nearby waterways during rainfall, particularly in heavy rain.

Position under NAP 2019

There are no provisions requiring the use of buffer strips in the current NAP regulations.

Reasons for Change

The proposal aims to reduce the loss of nutrients, particularly phosphorus, from arable land into nearby waterways.

After cultivation, arable land can be left with bare soil, which increases the risk of soil and nutrients being washed into rivers during rainfall. During heavy or intense rain, both soil particles and dissolved nutrients can be carried downslope into watercourses.

Research shows that buffer strips can slow down surface water, allowing soil and nutrients to settle before reaching the waterway.

Studies indicate that even narrow buffer strips can significantly reduce sediment loss, with wider buffers providing greater protection, depending on soil type, slope, and weather conditions. Other alternatives such as contour ploughing parallel to watercourses, creation of simple bunds by ploughing and sediment fencing can be effective.

Reducing nutrient losses is important for protecting water quality and meeting environmental objectives.

What is being proposed

Voluntary, uncultivated buffer strip alongside waterways in arable fields.

Key features of the proposal include:

- The buffer would be an area of land left uncultivated and covered with vegetation, such as grass
- The width of the buffer strip would vary, depending on local site conditions and risk factors
- The buffer area would not be treated with fertilisers or plant protection products
- The buffer would apply along waterways and waterbodies.

Participation would be voluntary, supporting farmers to take informed decisions.

The benefits of this are:

- **Improve water quality by reducing sediment and phosphorus runoff**
- **Support sustainable farming by helping retain soil and nutrients**
- **Give farmers flexibility to adopt good practice in a practical way**
- **Show environmental responsibility and may help reduce the need for stricter regulation in future.**

Question 23

i. To what extent do you agree or disagree with the proposal to introduce a voluntary, uncultivated buffer strip alongside waterways in arable fields?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.5.4 Voluntary Liming

Introduction

Evidence shows that many grassland farms in NI are operating with soil pH levels below the optimum range. Sub-optimal pH can reduce the effectiveness of fertilisers and limit grass growth and yields.

Liming is one of the most effective management practices to improve overall soil health. By improving soil health and nutrient use efficiency, more can be gained from the nutrients applied, and overall N and P inputs can be lower. Soil pH data is already being collected across NI, and farmers participating in the SNHS currently receive lime recommendations.

Liming is beneficial on managed grassland and mineral soils. However, certain land types must not be limed, including peat soils, species rich grassland, other priority habitats, and environmentally protected sites.

Position under NAP 2019

There are no provisions within the current NAP in relation to liming.

Why is the Change Being Considered?

Soil pH is a key factor in how effectively plants take up nutrients such as nitrogen and phosphorus. Research and experience show that liming is one of the most effective and cost-efficient ways to correct low soil pH.

Low soil pH can:

- Reduce crop and grass growth
- Limit the availability of nutrients already present in the soil
- Increase the risk of nutrient losses to the environment.

Improving soil pH through liming helps address these issues while supporting sustainable farm management.

Farms already participating in schemes such as the Soil Nutrient Health Scheme (SNHS) will benefit from their existing soil data to inform lime application decisions.

What is being proposed

Continue to raise awareness of benefits of liming on suitable land.

Key features of the proposal include:

- Liming would apply mainly to intensively managed grassland farms on mineral soils
- Certain land types would be excluded, including peat soils, species rich grassland and other priority habitats, and protected sites
- Farms would be encouraged to have up-to-date soil analysis, with lime requirements identified through soil testing and a farm nutrient management plan.

Participation would be voluntary, supporting farmers to take informed decisions about soil management.

The benefits of this are:

- **Improved nutrient uptake: Correct soil pH allows fertilisers and nutrients to be used more efficiently**
- **Better use of existing soil nutrients: Optimising pH helps release phosphorus already stored in soils, supporting grass growth**
- **Greater nitrogen efficiency: Improved pH can reduce nitrogen losses, benefiting water and air quality**
- **Lower input costs over time: More efficient nutrient use may reduce the need for additional fertiliser**
- **Healthier soils: Liming supports soil structure, biological activity and long-term resilience.**

Question 24

i. To what extent do you agree or disagree with the proposal to continue to raise awareness of benefits of liming on suitable land?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.6 Definition updates & Technical amendments

4.6 Definition updates & Technical amendments

As part of the review of the NAP, DAERA has identified a number of areas where the existing regulations could be improved. These changes focus on making the rules clearer, correcting errors, and ensuring that they are consistent across DAERA.

These amendments do not introduce new policy measures. Instead, they aim to improve how the current rules work in practice. This includes making sure that wording is clear, definitions are up to date, and requirements are easier to understand and apply.

The proposed changes include:

- Updating key definitions used in the regulations
- Aligning terminology so it is consistent across guidance and policy
- Correcting drafting issues and minor errors
- Clarifying how certain requirements should be applied in practice.

These updates are intended to:

- Reduce confusion
- Support consistent interpretation of the rules
- Make it easier for farmers and advisers to comply
- Improve how the regulations are implemented and enforced.

The following sections set out the specific technical amendments being proposed.

Proposed Measures

4.6.1	**Definition of Appropriate Person**
4.6.2	**Definition of Farmyard manure**
4.6.3	**Updating terminology**
4.6.4	**Covering of Lagoons**
4.6.5	**Definition of heavy rain**
4.6.6	**Changes to the Phosphorus content of livestock feed**

4.6.1 Definition of Appropriate Person

DAERA is proposing to amend the definition of appropriate person to align the wording so that it is consistent with the wording used for storage requirements already used within the Regulations.

It is proposed that in paragraphs (c) and (d) of the definition that 'livestock manure' will be replaced with 'Organic Manure'.

Thereby, reference to the appropriate person will be extended to include those who have control of all organic manures and not just livestock manure.

Question 25

i. To what extent do you agree or disagree with the proposal to amend the definition of appropriate person?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.6.2 Definition of Farmyard manure

The definition of farmyard manure will be amended to include stackable organic matter that can be used as a fertiliser.

Question 26

i. To what extent do you agree or disagree with the proposal to amend the definition of farmyard manure?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.6.3 Updating terminology

The NAP regulations currently refer to ‘Fertilisation Account’ and ‘Fertilisation Plans’. It is proposed to amend these to ‘Nutrient Management Account’ and ‘Nutrient Management Plans’ which are more reflective of the terminology used across the industry.

Question 27

i. To what extent do you agree or disagree with the proposal to amend the terminology in the NAP Regulations from “Fertilisation Account” and “Fertilisation Plans” to “Nutrient Management Account” and “Nutrient Management Plans?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.6.4 Covering of Lagoons

Following the consultation in 2019, it was agreed that the provisions within Schedule 6, paragraph 12 reference to 'Any slurry storage tank' should not include lagoons. The 2019 NAP Regulations do not accurately reflect this, and it is proposed that this should be corrected as part of the regulatory review.

The benefits of this are:

- **Clearer, corrected rules improve nutrient control and protect water quality**
- **Simpler wording and accurate values reduce confusion and compliance risk**
- **Greater clarity and consistency strengthen regulation and administration**
- **Supports better decision making and risk avoidance**
- **Prevents nutrient losses during heavy rainfall events.**

Question 28

i. To what extent do you agree or disagree with the proposal to correct the regulations so that, in Schedule 6 paragraph 12, the reference to "any slurry storage tank" does not include lagoons?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.6.5 Definition of heavy rain

Currently the definition of heavy rain simply states “more than 4mm of rain per hour” this may be difficult for some to interpret. To improve clarity, it is proposed to include “when a Met Office weather warning for rain is in operation”.

This amendment makes clear to operators, especially when considering the restriction on applying fertiliser when heavy rain is falling or forecast within 48 hours. Heavy rain will now be defined as either more than 4mm of rain per hour or when a Met Office weather warning for rain is in operation.

Question 29

i. To what extent do you agree or disagree with the proposal to clarify the definition of heavy rain so that it will include when a Met Office weather warning for rain is in operation?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.6.6 Phosphorus content of livestock diets

The analysis of the P content of ruminant concentrate feed has recently been completed and has confirmed reductions in P content.

The phosphorus (P) content of livestock diets is a key factor within the overall P inputs of NI and hence a key driver of the overall NI P balance. Over a number of years AFBI have undertaken an extensive programme of work, mainly funded by DAERA, which investigated nutritional strategies to reduce P levels in dairy, pig and poultry diets. This work demonstrated that P levels in diets could be lowered from historical levels, while maintaining productivity. This work was conducted in collaboration and discussed with the feed industry.

The analysis of the P content of ruminant concentrate feed has recently been completed and has confirmed reductions in P content. Based on the research the table in the NAP Regulations 2019 will be updated from four values to two, reflecting the most up to date data. Table 11 shows the proposed changes:

Table 11 NAP Regulations 2019 Sch 2 table 7 and Proposed Change

Existing NAP 2019 Regulations		Proposed change	
Agricultural Product	**Phosphorus Content (% fresh weight)**	**Agricultural Product**	**Phosphorus Content (% fresh weight)**
Poultry Concentrate	0.5 (or actual declared content)	Ruminant Concentrates	0.47 (or actual declared content)
Pig Concentrate	0.48 (or actual declared content)		
Ruminant Concentrate	0.55 (or actual declared content)		
All other concentrates	0.58 (or actual declared content)	All other concentrates	0.43 (or actual declared content)

Labelling of Feed

It is also proposed that all manufacturers of Animal feed will be required to clearly label the product to show the % P content.

Question 30

i. To what extent do you agree or disagree with the proposal to amend the standard values for the phosphorus content of livestock feeds?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.7 Implementation - including inspections/ enforcement

4.7 Implementation - including inspections/enforcement

Effective implementation is an important part of ensuring that the NAP delivers its intended outcomes. This includes making sure that the rules are applied consistently, that compliance is monitored, and that appropriate action is taken where issues arise.

DAERA recognises that most farmers aim to follow the rules and manage nutrients responsibly. For this reason, the proposed approach places a strong emphasis on clear guidance, advisory support and practical engagement, alongside proportionate inspection and enforcement activity.

The proposals in this section aim to support a balanced approach by:

- Improving clarity on responsibilities within the regulations
- Strengthening accountability where information is provided
- Targeting inspection activity where environmental risks are highest
- Supporting compliance through advice, guidance and engagement.

Together, these measures are intended to ensure that the regulations are applied in a fair and consistent way, therefore helping to contribute to improved water quality and environmental outcomes.

The following sections set out the specific proposals relating to enforcement provisions and a more targeted approach to inspections.

Proposed Measures

4.7.1	**False or misleading information provisions**
4.7.2	**Increased inspections in focused areas**

4.7.1 False or misleading information provisions

Position under the 2019 NAP

Currently, the Controller is responsible for the management of their holding, including the provision of information to DAERA as requested. This also includes a duty not to provide false or misleading information..

What is being proposed

To extend the existing duty not to provide false or misleading information so that it applies not only to the controller, but also to the appropriate person.

This will mean that individuals who undertake work or supply information on behalf of a controller could be held responsible if they deliberately provide false or misleading information for the purposes of the Regulations.

This proposal builds on changes made during the last review of the NAP, where certain offences relating to slurry spreading were extended to apply to the appropriate person. It recognises that contractors often carry out this work and may commit offences independently of the controller's direct knowledge or instruction.

The benefits of this are:

- **Improve the accuracy and reliability of information provided under the Regulations**
- **Ensures that responsibility rests with the person who deliberately provides false or misleading information**
- **Protects the farmers, by allowing action to be taken against contractors or other professionals who knowingly supply inaccurate information without the controller's direction or awareness.**

Question 31

i. To what extent do you agree or disagree with the proposal to extend the existing duty, not to provide false or misleading information, so that it applies to both the controller and the appropriate person?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.7.2 Increased inspections based on risk

Position under the 2019 NAP

Since 2007, compliance with NAP rules has been checked mainly through inspections linked to farm support schemes.

Until recently, inspections were carried out under the EU cross compliance system.

From January 2026, this system has been replaced by a new set of Farm Sustainability Standards (FSS).

To receive payments under schemes such as the Farm Sustainability Payment, farmers must meet these standards, including Farm Sustainability Standard 1, which covers protection of water from pollution and reflects the existing NAP rules.

A new penalty system applies from 2026. It is intended to be proportionate and fair, taking account of how serious any breach is.

How inspections are selected

Around 1% of farms claiming support are inspected each year.

Inspections are selected:

- 25% at random
- 75% based on risk, such as:
  - Nitrogen loading levels
  - Water quality data
  - Location in priority catchments.

In addition to planned inspections, the Northern Ireland Environment Agency (NIEA) also carries out referral-based inspections, for example following reports of pollution incidents.

Reasons for the Change

- To increase inspection coverage - The proposal recognises that the current level of inspections is limited.
  - By making inspections more efficient and increasing resources, the overall number of inspections could be increased. This would improve the effectiveness of the system and provide a stronger incentive to comply.
- A fair and proportionate approach to enforcement.
  - Penalties will be applied in a gradual and proportionate way.

What is being proposed

This proposal introduces a revised approach to inspections which aims to make them more targeted, efficient and fair, so that effort is focused on the farms and activities that present the greatest risk to the environment.

The proposed revised approach is set out as follows.

A stronger focus on advice and support

The proposed approach recognises that most farmers want to comply with the NAP requirements and protect water quality.

Under this proposal there will be a focus on:

- Clear guidance and information
- Raising awareness of requirements
- Access to advisory support.

Where issues are identified, the first step will normally be to work with the farmer to correct them. This will help farmers understand what is required and how to meet the standards.

A more targeted approach to inspections

Inspections will be more focused on farms and activities where the risk to the environment is higher.

This means that:

- Farms that produce higher levels of livestock manure will be more likely to be inspected
- Inspection rates will vary depending on the level of risk and participation in support programmes.

For example:

- Farms which are not part of the NSP, but which are operating over 170kg Nitrogen per hectare per year, will be considered High Risk and will be subject to the highest 10% rate of inspection.
- Farms in Tier 1 of the NSP, will be considered as a lower risk and will therefore have a 1% inspection rate, reflecting their higher compliance.
- Farms in Tier 2 of the NSP (considered as in-conversion) will be considered as a higher risk than those in Tier 1 and therefore will have a 5% rate of inspection.

This approach is designed to target resources where they can have the greatest impact.

More visible inspection activity

The proposal includes a greater presence of inspectors on the ground.

Inspections will focus on key activities that can lead to pollution if not managed properly, such as:

- Spreading slurry during unsuitable conditions (for example, before or during heavy rain)
- Verifying records of slurry or manure being transferred between farms
- Checking use of Low Emission Slurry Spreading Equipment (LESSE) on farms which are required to use it.

This will help ensure that the most important rules are being followed in practice.

Simpler and more focused inspections

The current inspection system covers a wide range of checks. Under this proposal, inspections would be streamlined.

This means inspections will focus on the most important areas, including:

- Limits on nitrogen from livestock manure
- Use of phosphorus fertiliser
- Adequacy of slurry storage

- Management of farmyards
- Risks of pollution reaching waterways
- Record keeping.

Simplifying inspections should make them quicker to carry out and allow more farms to be inspected overall.

This aims to ensure that the system is fair and proportionate, with appropriate higher penalties for serious or repeated breaches.

The benefits of this are:

- **Increased inspection coverage**
- **Better protection of water quality, especially in high-risk areas**
- **Improved compliance with NAP rules across the farming sector**
- **A fairer system, where non-compliance is more likely to be detected**
- **Greater confidence that public environmental standards are being upheld.**

Question 32

i. To what extent do you agree or disagree with the proposal to introduce a revised approach to inspections which aims to make them more targeted, efficient and fair, so that effort is focused on the farms and activities that present the greatest risk to the environment?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use space below if you wish to explain your answers and provide any additional comments.

4.8 Scientific evidence, robust data and modelling

Effective regulation depends upon reliable monitoring data, sound scientific research and appropriate analytical tools to identify environmental pressures, understand cause-and-effect relationships and evaluate the likely consequences of different interventions. Environmental systems are complex, and the causes of change are often cumulative, diffuse and slow to emerge.

Scientific evidence, data and modelling will continue to play an important role in assessing how well the NAP is working. This will include:

- Monitoring water quality
- Assessing nutrient balances
- Tracking emissions data
- Reviewing wider environmental indicators.

Data and modelling will support informed decision-making and help show whether the NAP is achieving its aims. It will also help identify future trends and whether measures are on track to meet targets.

Evidence and analysis are also essential to regulatory assurance. They provide an objective basis for determining whether measures are well targeted, proportionate and likely to deliver environmental improvement. Environmental trend analysis, reporting and technical review help assess whether regulations are being implemented effectively and whether progress towards outcomes is being achieved. Scientific evidence will strengthen transparency, decision-making and improve accountability to stakeholders and the public.

Modelling is a key component of assuring policy effectiveness. It can be used to assess nutrient and pollutant pathways, estimate the likely effect of regulatory and management measures, and test alternative scenarios before policy decisions are made. This is particularly important where environmental responses may take time to emerge, where pressures vary across catchments or sectors, or where interactions between land management and water quality are complex. Modelling can therefore complement measured data by helping policymakers understand both current conditions and likely future outcomes under different regulatory approaches.

4.9 Related measure being progressed through separate legislation

Fertiliser Database

DAERA recognises the need for better information on how fertilisers are sold, moved and used. This is important to support improved nutrient management and to help reduce pollution.

A NI Fertiliser Database is being developed as part of the Lough Neagh Action Plan.

However, this database will not be introduced through the NAP Regulations. Instead, it will be taken forward and consulted on separately:

- It will be brought forward through separate legislation
- A public consultation will be carried out before new legislation is introduced.

This will allow farmers, industry and other stakeholders to:

- Comment on the proposed approach
- Help shape how any potential database will operate
- Ensure the system is practical and proportionate.

Part 5 - Governance - Monitoring and Review

Part 5 - Governance - Monitoring and Review

Why governance is important

Strong governance and effective monitoring are essential to ensure the NAP is delivered clearly, consistently and accountably. They also help ensure the Programme leads to positive environmental outcomes over time.

The revised NAP is not a fixed end point; it forms part of a multi-cycle Plan. It is part of an ongoing process of improvement and where required, will be amended to ensure the necessary environmental improvements will occur through the iterative and cyclic nature of the Plan. Governance arrangements will support this by enabling regular monitoring, review and adaptation. This will help ensure that measures remain suitable, effective and proportionate as new evidence, environmental pressures and policy changes emerge.

Governance will provide a clear structure for oversight. This will allow progress to be tracked, risks to be identified early, and decisions to be based on the best available evidence. It will also ensure transparency in how progress is measured and how decisions are made, particularly where changes to policy or implementation are needed.

Good governance will support coordination across:

- Government
- Farmers
- The agri-food industry
- Environmental organisations.

This will help ensure that:

- Actions are aligned
- Roles and responsibilities are clear
- The Programme operates in a joined-up way across policy areas.

A key principle is the continued involvement of stakeholders. Building on the work of the NAPSTFG, governance arrangements will ensure stakeholders continue to play an active role in overseeing the Programme. Stakeholders are not only contributors to consultation, but partners in monitoring progress and shaping future development.

NAP Steering Group - role and functions

A NAP Steering Group will be established to oversee implementation and review how effective the measures are.

The Group will include representatives from:

- The farming sector
- The agri-food industry
- Environmental organisations
- DAERA.

Further detail on its structure and reporting arrangements will be developed as part of the NAP Review process.

The Steering Group will:

- Monitor progress against agreed indicators
- Review new evidence and analysis
- Assess whether measures are achieving sufficient take up and/or intended outcomes

- Identify risks, gaps or unintended impacts
- Make recommendations to DAERA on possible changes
- Provide a route for ongoing stakeholder input
- Support alignment with related policy areas, including water quality, ammonia and climate change.

All recommendations made by the Group will be considered by DAERA. Where recommendations are not taken forward, reasons will be clearly set out.

The work of the Group will:

- Ensure ongoing review and governance
- Identify if further escalation in measures is required
- Inform future NAP reviews
- Contribute to future public consultations
- Support wider policy development.

Monitoring and review framework: Pathway to compliance

The governance of the NAP will be supported by a structured monitoring and review framework. This will include:

- Ongoing review of progress with some specific measures reviewed after two years (more detail in the Review of Measures section), in addition to the full statutory review every four years
- Evaluation of uptake of programmes and measures at farm, catchment and national levels
- Assessment of environmental indicators such as water quality and nutrient balances
- Review of compliance data, including inspection outcomes and trends
- Alignment with wider reporting cycles, such as RBMPs.

This approach will allow changes to be made where progress is limited.

Review of Measures

The progress of all measures introduced under this NAP will be reviewed within two years of implementation.

This review will:

- Assess how well the measures are being put into practice
- Consider whether these measures are improving water quality as intended, to the extent that is possible within the timeframe of two years
- Identify any issues or barriers affecting delivery
- Consider the measures (noted below) which are the key focus of the 2 year review and may be subject to further action if necessary.

Key focus of the review

A key focus of the review will be the new measures on Chemical Phosphorus Fertilisers, Nutrient Stewardship Programme and Focused Approach. This will include:

- Assessing the level of uptake
- Considering whether they are delivering the expected environmental outcomes, to the extent that is possible within the timeframe of two years.

Metrics and Indicators

A set of metrics and indicators will be developed to support the two-year review and measure progress against expected outcomes. These will be based on the best available evidence and will include appropriate measures of behaviour change, changes in agricultural practices, trends in chemical phosphorus fertiliser use, and progress in the uptake and effectiveness of measures such as the Nutrient Stewardship Programme and the Focused Approach. This will help to determine whether the measures are effective and appropriate, or whether amendments and adjustments as outlined above are needed.

Further action if needed

Where monitoring indicates that expected outcomes are not being achieved or sufficient take up of voluntary measures has not been secured, a staged and proportionate response of escalation will be applied to ensure that there is a pathway to compliance. This approach is aligned with the recommendations within the Strategic Environmental Assessment Report (SEA Environmental Report) and the Report to Inform Appropriate Assessment (RIAA).

This may include the introduction of:

- Increased advisory support and awareness raising
- Additional requirements
- More targeted measures
- Amendments to relevant voluntary or advisory measures to become mandatory.

This approach ensures that the Programme can respond to new evidence and changing circumstances, while remaining focused on achieving improvements in water quality. It also reflects a commitment to transparency, accountability and ongoing engagement, ensuring that progress is clearly monitored and reported over time, and ensure the NAP is on a pathway to compliance.

Compliance, enforcement and targeted intervention

Compliance and enforcement will form a core part of delivery. Monitoring data and inspection outcomes will be used to assess compliance and identify where action may be needed.

A risk-based approach will be applied. This means focusing effort on areas where environmental risks are highest. This may include:

- Increased inspections
- Closer monitoring of high-risk farms
- Targeting priority catchments.

Where progress is not being achieved, a staged and proportionate response will be used. This may include:

- Increased advice and support
- Targeted regulatory action
- Stronger enforcement where needed.

This approach is aligned with the recommendations within the Strategic Environmental Assessment Report (SEA Environmental Report) and the Report to Inform Appropriate Assessment (RIAA).

Transparency and reporting

DAERA is committed to transparency in how the NAP is implemented.

This will include:

- Regular reporting on progress
- Publication of relevant data where appropriate
- Clear explanations of how decisions are made.

It will also include clear communication of:

- How monitoring data is used
- How recommendations are assessed
- Where challenges or gaps remain
- Where further action may be required.

Governance arrangements will ensure that the NAP is implemented in line with legal and environmental obligations. Monitoring and review will be based on defined indicators and targets to assess environmental outcomes and compliance with statutory obligations, including Water Framework Directive objectives and the protection of European sites.

Where monitoring identifies that outcomes are not being achieved or sufficient take up of voluntary measures has not been secured, governance will support adaptive management, including targeted additional intervention in high-risk areas and the strengthening of measures where required. This approach will ensure that mitigation measures are implemented effectively, and that the Programme is able to prevent environmental deterioration and respond to emerging risks.

Interdependencies

The proposed measures depend on demonstrable progress on wider ammonia policy. Such progress is required alongside implementation of the NAP measures, recognising that the NAP's ambition can only be realised where ammonia policy advances in parallel. There are interdependencies between ammonia mitigation and the environmental assessments undertaken as part of the planning process. The governance arrangements described above should include a formal mechanism for assessing ammonia policy progress as part of considerations regarding implementation of the measures.

Part 6 - Impact assessments

Part 6 - Impact assessments

The Impact of the proposed measures

The potential social, economic and environmental impacts of the proposed measures have been evaluated. A series of impact assessments have been undertaken to evaluate how specific groups may be affected, and what impact the revised measures are likely to have.

Strategic Environmental Assessment Report and Report to Inform Appropriate Assessment also known as the Habitats Regulations Assessment

The Strategic Environmental Assessment Report (SEA Environmental Report) and the Report to Inform Appropriate Assessment (RIAA) (also known as the Habitats Regulations Assessment) acknowledge that the effective implementation of the proposed new draft NAP measures 2027-2030 were largely assessed as having the potential for positive effects on Strategic Environmental Objectives (SEOs). However, some negative and/or uncertain effects have been identified. There are uncertainties around the implementation of the measures, and it has been noted that the initial improvements in water quality following the introduction of the first iteration of the NAP Regulations have not been sustained and there is no evidence of a clear and consistent recovery of water quality to meet the objectives of the WFD Regulations, or to the levels necessary to restore and maintain European Sites and their qualifying interests to favourable condition.

Recommendations from SEA Environmental Report /RIAA

The SEA Environmental Report and RIAA have set out mitigation and monitoring measures where there is potential for negative and/or uncertain effects on SEOs from the implementation of measures. The RIAA and the SEA Environmental Report propose that focused measures are applied in areas of higher risk, in recognition of the differing water quality and catchment conditions, as well as agricultural activities, across NI. They also recommend that a step by step approach is taken to establish the methodology and for application of a focused approach throughout NI to identify higher risk areas and thus target measures for improvements in water quality. Across the measures, it is recommended that inspection rates are significantly increased, and enforcement measures consistently applied and transparently reported in order to improve the implementation and efficacy of existing and proposed measures.

What we are doing in NAP to address this

The revised NAP measures are putting us on a pathway to compliance. We have introduced a number of mitigating measures and these include increased inspection rates, increased governance and a monitoring and review programme. We have also introduced a new approach whereby derogations are replaced by the Nutrient Stewardship Programme (NSP). The NSP proposes to increase the number of farms that are on a pathway to optimal nutrient efficiency. This has been developed as a risk-based approach with a higher inspection rate for the farms that are in Tier 2. The level of uptake and impact of the NSP will be reviewed after two years, and again as part of the wider NAP review, as set out in the governance section. If the review concludes that the approach is not effective, then a more restrictive regulatory system will be required.

SEA Environmental Report

Question 33

i. To what extent do you agree or disagree with the conclusions in the SEA Environmental Report?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use the space below if you wish to share any views on the SEA Environmental Report.

Report to Inform Appropriate Assessment (RIAA) also known as Habitats Regulations Assessment (HRA)

Question 34

i. To what extent do you agree or disagree with the conclusions in the Report to Inform Appropriate Assessment (RIAA) also known as Habitats Regulations Assessment (HRA)?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

ii. Please use the space below if you wish to share any views on the Report to Inform Appropriate Assessment (RIAA).

Regulatory Impact Assessment

A detailed and rigorous Regulatory Impact Assessment (RIA) has been prepared to accompany the NAP consultation. This provides the costs and benefits of implementing the revised proposed measures. The benefits to the environment and water quality have also been considered in the RIA and your views on this RIA are requested as part of the consultation.

A full Economic Impact Assessment will be finalised as part of the work of the NAP Stakeholder Task and Finish Group and this will be essential to help inform implementation..

Question 35

i. To what extent do you agree or disagree with the conclusions in the Regulatory Impact Assessment?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to share any views on the Rural Needs Impact Assessment.

Rural Needs Impact Assessment

DAERA has a statutory duty to implement the requirements of the Rural Needs Act. A Rural Needs Impact Assessment has been carried out and determined that no further action is required at this stage to address rural issues. The Rural Needs Impact Assessment has been published on DAERA website.

Question 36

i. To what extent do you agree or disagree with the conclusions in the Rural Needs Impact Assessment?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to share any views on the Rural Needs Impact Assessment.

Equality and Disability Duties Screening

An Equality and Disability Duties Screening has been completed for the NAP.

It has demonstrated that there will not be a differential impact because of an individual's religious belief, national identity, racial group, age, marital status, sexual orientation, gender, disability or whether or not they have dependants. Therefore, DAERA considers that the NAP has been screened out from a full Equality Impact Assessment to be necessary.

Question 37

i. To what extent do you agree or disagree with the conclusions in the Equality and Disability Duties Screening?

- ☐ **Strongly agree**
- ☐ **Agree**
- ☐ **Neither agree nor disagree**
- ☐ **Disagree**
- ☐ **Strongly disagree**

ii. Please use the space below if you wish to share any views on the Equality and Disability Duties Screening.

Part 7 - Supporting Documents

Part 7 - Supporting Documents

The following documents have been published as part of the NAP 2027-2030 Consultation and are available on DAERA website.

- NAP Stakeholder Task and Finish Group Terms of Reference
- NAP Stakeholder Task and Finish Group final report and summary of proposed measures
- Science Subgroup papers
- Technical Subgroup papers
- Review of the 2019 Nutrient Action Programme Regulations
- Nutrients Action Programme Implementation Report for 2020 - 2023
- Synopsis of responses to May 2025 NAP Consultation
- Strategic Environmental Assessment Report
- Report to Inform Appropriate Assessment
- Rural Needs Impact Assessment
- Regulatory Impact Assessment
- Equality and Disability Duties Screening

Key Acronyms

AD	Anaerobic Digestate
AFBI	Agri-Food and Biosciences Institute
CAFRE	College of Agriculture, Food and Rural Enterprise
DAERA	Department of Agriculture, Environment and Rural Affairs
EFS	Environmental Farming Scheme
FSS	Farm Sustainability Standards
LU	Livestock Unit
NAP	Nutrients Action Programme
NAPSTFG	Nutrients Action Programme Task and Finish Group
NECR	National Emission Ceilings Regulations
NIEA	Northern Ireland Environment Agency
NSP	Nutrient Stewardship Programme
OEP	Office for Environmental Protection
RBMP	River Basin Management Plan
SNHS	Soil Nutrient Health Scheme
SCP	Sustainable Catchment Programme
SAP	Sustainable Agriculture Programme
SFIS	Sustainable Farming Investment Scheme
SULS	Sustainable Utilisation of Livestock Slurry
WFD	Water Framework Directive

Summary of Proposed Measures

No.	Proposed Measures	Summary	Type of Change
4.1.1	Chemical phosphorus fertiliser (advisory approach)	Link use of phosphorus fertiliser on grassland to soil testing and nutrient plans, supported by advisory approach and controls at point of sale.	Amendment to existing measure & advisory support
4.1.2	Reduce national phosphorus surplus	Reduce national average P surplus by 30% using combined measures.	New measure and advisory / best practice actions
4.1.3	Dairy cow excretion values (banding)	Introduce milk-yield-based nutrient excretion values with multiple calculation options.	New method for calculation of excretion values
4.1.4	Poultry excretion values update	Update standard N and P excretion figures and associated tables.	Technical amendment
4.1.5	Separated slurry values (screw press)	Introduce new standard values for separated slurry fractions.	Technical amendment
4.1.6	Nitrogen fertiliser limits (grassland)	Replace fixed limits with whole-farm limits linked to grass production levels.	Amendment to an existing measure
4.1.7	Processed organic fertilisers	Introduce allowance of 100 kg N/ha/year for processed fertilisers from agricultural sources.	New measure
4.2.1	Reduced slurry application volumes	Reduce max application rate (Oct/Feb) from 30m^3/ha to 25m^3/ha.	Amendment to existing measure
4.2.2	Updated LESSE definition	Broaden LESSE definition based on emission reduction performance.	Definition update

No.	Proposed Measures	Summary	Type of Change
4.2.3	Tiered rollout of LESSE	Gradual extension of mandatory LESSE based on farm size. Tiered: 2028, 2029, 2030	Amendment to existing measure
4.2.4	Pre-notification of slurry/silage stores	Require notification 28 days before construction (with engineer certification).	Amendment to existing measure
4.2.5	Covered slurry storage (clarification)	Clarify acceptable cover types (tight fitted or fixed).	Clarification of existing measure
4.2.6	Urea fertiliser restrictions	Seasonal restriction: protected urea required from 1 April	New measure
4.2.7	Anaerobic digestate controls	Introduce rules on digestate application, separation, and reporting.	Amendment to existing measure
4.3.1	Nutrient Stewardship Programme (NSP)	Replace derogation with two-tier nutrient management framework.	New Measure
4.3.2	Mitigation for late harvested crops	Introduce planting-stage mitigation measures for high-risk arable crops.	New measure
4.3.3	Focused catchment approach	Introduce voluntary targeted advisory support in high-risk areas.	New measure (voluntary) & Advisory support
4.3.4	Nutrient Efficiency Roadmap	Develop long-term cross-sector roadmap for nutrient efficiency improvements.	Advisory support & best practice
4.4.1	Enhanced slurry/manure reporting system	Introduce additional requirements on reporting and verification of slurry movements	Amendment to existing measure
4.4.2	Extend system to processed organic materials	Include digestate and processed products in reporting system.	Amendment to existing measure

No.	Proposed Measures	Summary	Type of Change
4.5.1	Storage awareness	Improve awareness of existing storage rules and best practice.	Guidance, advice and knowledge transfer
4.5.2	Silage bale storage requirements	Strengthen rules to reduce pollution risk from bale storage.	Amendment to existing measure
4.5.3	Voluntary buffer strips	Promote uncultivated buffer zones on arable land.	Voluntary and Advisory support
4.5.4	Voluntary liming	Promote benefits of liming on suitable soils.	Voluntary and Advisory support
4.6.1	Definition of appropriate person	Extend scope to all organic manure management.	Definition update
4.6.2	Definition of farmyard manure	Broaden definition to include all stackable organic material.	Definition update
4.6.3	Terminology update	Replace fertilisation terms with nutrient management terminology.	Change in Terminology
4.6.4	Lagoons (technical correction)	Clarify that lagoon coverage requirements differ from tanks.	Clarification
4.6.5	Definition of heavy rain	Add Met Office warning to clarify definition.	Definition update
4.6.6	Phosphorus in feed	Update standard phosphorus values.	Technical amendments
4.7.1	False/misleading information	Extend accountability to “appropriate person” (e.g. contractors).	Amendment to existing measure
4.7.2	Targeted inspections	Introduce more risk-based and tiered inspection approach.	Amendment to existing approach

Public Consultation on the

Nutrients Action Programme 2027-2030

Department of
Agriculture, Environment and Rural Affairs

An Roinn
Talmhaíochta, Comhshaoil agus Gnóthaí Tuaithe

Depairtment o'
Fairmin, Environment an' Kintra Matthers

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