



Consultation on the Proposed Nutrients Action Programme 2026 – 2029: Synopsis of Responses

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Department of
**Agriculture, Environment
and Rural Affairs**

An Roinn

**Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe**

Depairtment o'

**Fairmin, Environment
an' Kintra Matthers**

www.daera-ni.gov.uk

Consultation on the Proposed Nutrients Action Programme 2026 – 2029: Synopsis of Responses

This document is also available on the DAERA website at:

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Introduction

The Department of Agriculture, Environment and Rural Affairs (DAERA) launched a public consultation on 1 May 2025 which ran for twelve weeks seeking views on its proposals for the review of the Nutrients Action Programme (NAP) (2019) and its proposed NAP for 2026-2029. The Department wishes to thank all stakeholders and members of the public who took the time to respond to the consultation.

The consultation closed on 24 July 2025, and a total of approximately 3,400 responses had been received. The responses were received through a variety of methods, these included:

- 1,472 through citizen space
- 1,746 via email
- 174 via post

Responses were received from individuals, farm businesses, political representatives and representative organisations across the Farming, Agri-food and Environmental sectors.

In this document, for data protection reasons, responses from individuals have been treated anonymously while comments from organisations and charities may be attributed directly to them.

This document is not intended to be a comprehensive report of every view expressed but rather a broad summary of the issues raised by respondents. The document also sets out the Department's intended way forward following consideration of the responses received.

A wide range of statutory consultees and relevant stakeholders were contacted directly via email and were provided with a link to the consultation document, its related impact assessments, and guidance on how to respond. During its twelve-week term, the consultation was widely and regularly publicised online via the Department's social media accounts.

The Department met with key representatives on 1 May to inform them of the launch of the consultation, followed by a wider stakeholder meeting on 6 May. Then during the consultation period, the Department also held three focused meetings with key stakeholders, the aim of which was to provide further information and clarification on key themes across the consultation proposals.

In addition to this there were also two in person public stakeholder events held in Loughry Campus and Greenmount Campus respectively and there were also two online information events. The purpose of these events was to share an outline of the proposed changes and the evidence base on which the proposals were based.

A list of those who responded can be found at **Appendix A**.

Methodology

Stage 1 Quantitative Responses: Respondents were initially asked to indicate agreement, disagreement or neutrality towards individual proposals. Quantitative data including tables showing the numbers of respondents in each response category ('Strongly Agree', 'Agree', 'Neutral', 'Disagree', 'Strongly', 'Disagree', 'Not Answered') were exported directly from Citizen Space and have been incorporated into this report. MS Copilot¹ was used as an efficiency tool, due to the large number of responses received, to help quantify numbers of respondents in each response category ('Agree', 'Disagree', 'Neutral') responding to the consultation questions outside of Citizen Space. Where responses did not explicitly state agreement, disagreement, or neutrality, the tone and themes within second stage qualitative responses were interpreted to determine the respondent's position. A percentage analysis was applied separately to responses collected within and outside Citizen Space to assess the preferred or dominant views for each proposal.

¹ MS Copilot is a Departmental approved AI tool

Stage 2 Qualitative Responses: Respondents who disagreed with proposals during stage 1 were invited to explain their reasoning and, where possible, suggest alternative solutions with supporting evidence:

“If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk”

While the majority of stage 2 respondents expressed disagreement with proposals, some respondents who agreed, were neutral, or did not provide an answer in stage 1, also provided additional comments. This report summarises all responses received.

Qualitative responses were analysed using a thematic analysis approach. This method examines the data to identify common themes such as recurring topics, ideas, and patterns of meaning across the collection of responses. All responses were reviewed individually. MS Copilot was used to assist in identifying broad themes and summarising positions within these narrative responses.

Responses are included in this report under each individual question. The views expressed in the written responses have been taken directly from the responses received. Where views differed to those expressed in Citizen Space, this has been detailed under the relevant question.

Written responses not relating to specific proposals were reviewed individually and categorised into four main thematic areas of concern, which were identified during review ('flawed consultation', 'devastating impact on farms', 'representation from red meat sector' and 'personal opinions'). Quantitative and qualitative summaries of responses within each of these categories are included in this report after summary of responses provided for individual questions.

Background

The aim of the Nutrients Action Programme (NAP) is to improve water quality and the wider environment by reducing and preventing pollution caused or induced by nutrients from agricultural sources. A key objective is to promote efficient management of livestock manures, manufactured fertilisers and other nutrient-containing materials spread onto land to reduce environmental impacts.

The EU Nitrates Directive required member states to set out action programmes to reduce nitrate levels in surface and groundwaters and eutrophication in surface waters. The Nitrates Directive allowed Member States to either designate discrete areas of land as Nitrate Vulnerable Zones (NVZs) or establish an action programme to be applicable to the whole territory.

In bringing forward the Protection of Water Against Agricultural Nitrate Pollution Regulations (Northern Ireland) 2004, the Department is required to establish and apply an action programme to regulate farming activities throughout Northern Ireland to reduce and prevent water pollution from agricultural sources. This approach was supported by a scientific report in 2002, which identified eutrophication as a major pollution problem throughout Northern Ireland's water environment and highlighted the extent of the agricultural contribution to the problem.

The first Nitrates Action Programme, to apply across the whole of Northern Ireland was introduced in 2007. The Nitrates Action Programme established a range of measures and controls on livestock manures and chemical fertilisers. Key measures include closed periods for the application of organic and inorganic fertilisers, a livestock manure application limit to land of 170 kg nitrogen/ha/year and the requirement for sufficient slurry storage capacity on farm. The aim is to provide greater protection for surface waters and groundwaters in Northern Ireland. The 2007 Action Programme was reviewed and revised in 2010, 2014 and 2019.

Following the introduction of the Nitrates Action Programme in 2007, Northern Ireland also successfully applied to the European Commission for a derogation enabling farmers who

meet the criteria to apply up to 250 kg nitrogen/ha/year from grazing livestock manures. This derogation was successfully renewed at each review, with the most recent derogation decision being granted in March 2019.

The existing Action Programme was introduced in April 2019, through the Nutrient Action Programme (NAP) Regulations (Northern Ireland) 2019, which consolidated the Nitrates Action Programme Regulations and the Phosphorus (Use in Agriculture) Regulations.

When the United Kingdom left the EU, the Nitrates Directive was retained and the functions contained in the Directive were transferred to the Department, by the Environment (Legislative Functions from Directives) Regulations 2019.

Motion in Assembly and Petitions

On 10 June 2025, there was a motion in the Assembly and call to stop the NAP Consultation. The motion was debated and the outcome was a favourable vote by members to stop the consultation.

At the time the Minister advised that the Consultation would continue in order to complete the consultation and allow for the public and stakeholders to respond to the proposals so that their views could be taken into account in the policy development process.

On 30 June 2025 the Department received a petition as presented to the Assembly Speaker to Stop the NAP Consultation from Michelle McIlveen as DUP MLA for Strangford, with 5000+ signatories.

On 24 July as part of the consultation responses through Citizen Space the Department received a second petition in support of the NAP proposals from the Lough Neagh Partnership, with 1000+ signatures.

Overview of Responses

Based on the responses received, stakeholders generally agree on the importance of improving water quality, evidence-based policy, practical and flexible approaches, and the need for improved consultation and integrated policies. However, there is disagreement on the pace and severity of regulatory changes, the balance between voluntary and mandatory measures, interpretation of scientific evidence, distribution of economic risks, and the role of technology in compliance and innovation.

A significant number of responses highlighted economic and social impacts on farmers and industry. In relation to the economic impact of some proposals, farmers, industry and processors expressed concern about severe economic losses, threats to farm viability and the challenges for small farms. Related to this, concerns were raised regarding mental health impacts, generational continuity and rural depopulation. Environmental groups expressed concerns regarding the potential for higher long-term costs as a result of insufficient action being taken.

Areas where stakeholders were broadly in favour of proposals

Stakeholders were broadly supportive of flexible nutrient management approaches such as retaining the derogation under strict controls, voluntary liming guided by soil analysis and the use of processed organic fertiliser with clear standards. Sustainable management was generally supported through endorsement of catchment-based programmes, nature based solutions, nutrient recovery via anaerobic digestate (AD) and slurry separation, and collaborative advisory and educational models. The rationale underpinning this support included recognising liming benefits for soil health and the pollution reduction potential of nutrient recovery technologies.

There was general support shown for the following areas, although in some cases from only one sector of stakeholders:

Table 1: Areas where stakeholders were broadly in favour of proposals

Area	Sector/Stakeholder	Narrative
Retention of the Derogation	Farming Agriculture	Welcome the retention of the derogation as it provides flexibility for some farms, although under stricter nutrient controls.
Liming Based on Soil Analysis	Farming Agricultural, Food Processors / Industry Bodies	Generally, in support of liming and endorsed it as best practice. However, they were strongly of the view that this should be voluntary and based on soil analysis.
Processed Organic Fertilisers	Farming Agriculture	Could be broadly supportive of these proposals; however, the standards and definitions need to be clearly laid out.

Area	Sector/Stakeholder	Narrative
Catchment-based approaches/Nature based solutions	Environmental and conservation groups Food Processors / Industry Bodies	Advocated for nature-based and collaborative solutions to protect water quality. Generally, in support of voluntary, collaborative water quality improvement measures.
Nutrient Recovery Technologies	Energy, Technology, Environmental and Advisory Groups	Largely supportive of proposals on use of Anaerobic Digestate (AD), slurry separation and biomethane as being environmentally beneficial.
Inspection Rates and Roadmaps	Government and Regulatory Bodies	Broadly supportive of the development of efficiency roadmaps and endorsed the increase in the number of inspections.

Areas where stakeholders could support proposals subject to some concerns being resolved

There is conditional support for technologies such as Low Emission Slurry Spreading Equipment (LESSE) and digital compliance systems, influenced by concerns about cost, practicality, and administrative burden, especially for small or upland farms. Uncertainty surrounds phosphorus and nitrogen limits, buffer strips and mandatory liming due to questions about scientific robustness and feasibility.

The key themes which stakeholders have expressed support for, but for which concerns need to be resolved are as follows:

Table 2: Areas where stakeholders could support proposals subject to some concerns being resolved

Area	Sector/Stakeholder	Narrative
Low Emission Slurry Spreading Equipment	Farming Agriculture	Largely support the use of LESSE for emissions reduction, but strongly expressed concerns about cost, terrain and practicality for small farms.
	Environmental and conservation groups	Mostly supported use of LESSE for ammonia emissions but raised concerns about suitability for small farms and prioritisation.
	Food Processors and Industry Bodies	Broadly supported the use of LESSE for emissions reduction but raised concerns about economic viability for small farms.

Area	Sector/Stakeholder	Narrative
Buffer Strips	Farming Agricultural	Recognised the environmental protection, but the width was noted as being excessive and inconsistent with other schemes and the preference was for these to be voluntary rather than mandatory.
	Environmental and conservation groups	Strongly supported this proposal as a mandatory measure to protect waterways.
Mandatory Liming	Farming Agriculture	Acknowledged the benefits of liming but questioned the feasibility and noted possible risks to biodiversity.
	Environmental and conservation groups	Supported targeted use of lime but noted risks to biodiversity and mapping inaccuracies.
Phosphorus and Nitrogen Limits	Environmental and conservation groups	Were generally supportive of the introduction of a statutory phosphorus balance and tighter controls within the proposals outlined in the consultation. The proposed introduction of statutory phosphorus balance targets is seen as a

Area	Sector/Stakeholder	Narrative
	Farming Agriculture	positive step by Government and Regulatory Bodies. Stakeholders noted that although conceptually sound, the proposals lacked practical feasibility and scientific clarity and therefore strongly opposed the proposed phasing of the proposals.
Processed Organic Fertiliser Limits	Environmental and conservation groups Energy, Technology and Advisory Groups	Supported this proposal but questioned the calculation methods and catchment-based assessments. Raised concerns about regulatory barriers and readiness for biomethane deployment.
Digital Compliance System	Food Processors and Industry Bodies Energy, Technology and Advisory Groups	Supported the concept but raised concerns about administrative burden and duplication. Although supportive of this, raised concerns about duplication and Departmental misalignment.

Areas where stakeholders were broadly opposed to the proposals

There was strong criticism from stakeholders on how the consultation process was carried out including the absence of an economic impact assessment and limited stakeholder involvement prior to the consultation. There was also strong opposition to proposals to introduce a phosphorus balance, mandatory buffer strips and reduced nitrogen limits, due to lack of an economic impact assessment and loss of land. The industry strongly opposed measures due to severe economic losses, threats to farm viability including generational continuity.

Environmental stakeholders criticised the proposed measures for not going far enough and cautioned that failing to implement measures to manage nutrient loss would have longer term implications.

The key themes which stakeholders are broadly opposed to are as follows:

Table 3: Areas where stakeholders were broadly opposed to the proposals

Area	Sector/Stakeholder	Narrative
Buffer strips and Silage Bale Limits	Farming and Agriculture	Strongly opposed these proposed measures due to land loss and lack of scientific justification.
	Environmental and conservation groups	Deemed the 3m buffer strip as insufficient, recommending that this should be a minimum of 6m, although it was also suggested that 11-15m may even be necessary.
Phosphorus and Nitrogen Limits	Farming and Agriculture	Strongly opposed these proposals stating their reasons for doing so were

Area	Sector/Stakeholder	Narrative
	Food Processors and Industry Bodies	that they were unworkable, lacked robust evidence and threatened farm viability. Broadly rejected these proposals due to flawed scientific basis and severe economic consequences.
Consultation process	Farming and Agricultural Environmental and conservation groups Food Processors and Industry Bodies	Strongly criticised the consultation due to the timing, lack of engagement and excessive bureaucracy. Criticised the department for a lack of strategic vision and stakeholder engagement. Criticised the process for lack of stakeholder engagement and inconsistent documentation.
Derogation system	Environmental and conservation groups	Strongly opposed the retention of the derogation system due to unsustainable nutrient loading across the agricultural system.
Mandatory Separation of Digestate	Energy, Technology and Advisory Groups	Broadly opposed to blanket mandates, advocating for performance-based standards.

Responses to individual questions

Respondents to the consultation were asked to answer 51 questions. Citizen Space received 1472 responses, this included individuals, non-government organisations and representative organisations. In addition to this there were approximately 135 responses from individuals and industry representative bodies, who responded directly to the consultation questions, or were responses from political representatives or statutory consultees. It should be noted that not every response addressed each question from the consultation document.

Please be aware that certain response counts in this section may include duplicates, as some respondents submitted their feedback through Citizen Space as well as a written response directly to the Department.

In Citizen Space respondents were asked to identify who they were, of the 1472 respondents, 1455 answered this question, the breakdown by organisation is at table 4.

Table 4: Citizen Space respondents broken down by organisation

Option	Total	Percent
Non-Government Organisation	24	1.63%
Business (including farm business)	1191	80.69%
Member of the public	217	14.70%
Representative Organisation	10	0.68%
Researcher	3	0.20%
Not Answered	31	2.10%

The following sections of this report will look at the responses received through Citizen Space and written responses received by the Department.

Water Protection

Questions 1 – 4 in the consultation document dealt with Water Protection, intercepting or breaking nutrient pathways.

Question 1: Do you agree that a 3 metre buffer in arable fields is wide enough to protect waterways from nutrient pollution?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space Responses

There were 1437 responses to this question, with 400 responding to the second part of the question.

Table 5 Citizen Space Respondents to Question 1

Option	Total	Percent
Strongly Agree	450	30.49%
Agree	365	24.73%
Neutral	160	10.84%
Disagree	192	13.01%
Strongly Disagree	270	18.29%
Not Answered	39	2.64%

The responses received through Citizen Space were of mixed views with just over half of the responses in support and one third disagreeing with the proposal for a 3 metre buffer in arable fields. Ten percent of responses were neutral.

The reasons given by Citizen Space respondents in response to the second part of the question relating to whether a 3-metre buffer in arable fields is sufficient to protect waterways from nutrient pollution, are outlined below.

Many of the respondents emphasised that weather and field conditions are more important than simply applying a fixed buffer width, such as 3-metres. They said that factors like rainfall, soil moisture, and the timing of farming activities have a greater impact on runoff risk, and for these reasons, decisions should be based on real-time weather and field conditions rather than a uniformed 3-metre buffer. Some suggesting a wider buffer of 5 or 10 metres, a wider, vegetated, wooded or engineered buffer would better protect water quality and biodiversity. The influence of topography, the presence of field drains, and how close fields are to water courses were highlighted as being important factors.

Some replies questioned the scientific justification of the 3-metre figure and requested further evidence, including impact studies tailored to different soils, rainfall patterns, and management practices. Others noted that agricultural buffers alone cannot address pollution and non-farm sources like sewage discharges or urban runoff, also require focus.

Finally, others expressed concern that a 3-metre buffer was too wide for small fields, as it could render fields unviable and increases costs. It was said that improved timing and placement of interventions could offer similar benefits.

Alternative proposals included adopting a flexible, risk-based approach tailored to local conditions, incorporating engineered or vegetated buffer designs (e.g. raised berms or sediment traps, saturated buffer zones, or deep root vegetation), and ensuring any buffer requirements are supported by clear guidance and financial assistance.

Written Responses

Table 6 Written responses from Individuals to Question 1

Organisations, Key Representatives and Individuals Responses directly responded - 78	Total	Percent
Agree	10	13%
Neutral	2	2%
Disagree	66	85%
Total	78	100%

In written responses there was less support for the 3-metre proposal than seen in Citizen Space, with a majority of responses opposing the proposal.

In responses there were a number of themes which came through relating to clarity around definitions and enforcement, efficacy of the 3-metre fixed buffer and the economic and operational implications for farm businesses. Most of these were also raised through the Citizen Space responses.

Many respondents asked for clear definitions of what constitutes a “waterway” and an “arable field”, including unambiguous guidance on where measurements should begin (such as the bank top or fence line) and how to categorise features like ditches, drains and headlands. Stakeholders voiced concerns about inconsistencies between different policy schemes particularly the confusion caused by a legal requirement for a 3-metre buffer and a funded voluntary 2-metre buffer.

A major area of concern for farm businesses was that a fixed 3-metre buffer would take productive land out of use, which was specifically raised in relation to Northern Ireland’s small and irregularly shaped fields. Other concerns were raised around unmanaged land which could cause issues of weeds and pests, complicating plant protection strategies.

Environmental respondents tended to view the 3-metre buffer as a minimum baseline, advocating for wider buffer strips particularly on steeper slopes, in high-risk areas or along sensitive watercourses. The sector also advocated for mandatory, nature-based solutions which should be supported by robust agri-environment schemes.

Across the responses and sectors, the preference was for risk-based or tiered approaches to the width of a buffer. Many stakeholders supported the idea of tailoring buffer widths to the specific risks of each site, taking into account runoff risks and slope of the land. The clear preference was for voluntary and agri-environmental support options rather than prescriptive regulatory or mandated buffer strips.

Suggestions for alternatives included tailoring widths to local risk factors, considering climate change, restricting certain crops in vulnerable catchments and using alternative measures such as willow planting, sustainable drainage systems and wetlands.

Question 2: Do you agree that storage of silage bales 20 metres from a waterway provides is wide enough buffer to protect waterways from nutrient pollution?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1434 responses to this question and 330 who responded to the second part of the question.

Table 7 Citizen Space Responses to Question 2

Option	Total	Percent
Strongly Agree	467	31.64%
Agree	452	30.62%
Neutral	160	10.84%
Disagree	156	10.57%
Strongly Disagree	199	13.48%
Not Answered	42	2.85%

The responses received via Citizen Space indicate that almost two-thirds were in support of the proposal to increase the storage of silage bales from 10 metres to 20 metres from a watercourse. A quarter of respondents disagreed and the remaining were neutral to the proposal.

For most respondents who answered the second part of this question run-off and effluent risk were the most frequent issues raised. Many participants supported the distance increasing due to concerns of leaching, especially during wet conditions or if bales had a low dry matter. There were minority of respondents who suggested more than 20 metres, with at least 50 metres from the water would be required to prevent effluent leaching into the water, this was especially noted for sensitive areas.

Many said the measure is excessive, impractical, and economically damaging, particularly for small or fragmented farms, without clear scientific evidence of its effectiveness in reducing nutrient pollution.

Concerns included loss of productive land, increased labour and logistical challenges, and the failure to account for bale dry matter content, ground conditions, and existing good practices. Respondents emphasised that properly wrapped bales stored on well-drained, level ground pose minimal risk to water quality.

Suggested alternatives included a risk-based, site-specific approach, shorter buffer distances where conditions allow, use of hard standing with effluent containment, and incentives for best practices such as double wrapping and slope management. Many called for flexibility, clearer definitions of waterways, and recognition of the low risk of leaching from modern baled silage systems.

Written Responses

Table 8 Written responses from Individuals to Question 2

Organisations, Key Representatives and Individuals Responses who directly responded - 33	Total	Percent
Agree	10	30%
Neutral	2	6%
Disagree	21	64%
Total	33	100%

Those who responded to this question were mostly opposed to the proposal and those who did agree generally did so with caveats of additional safeguards also being in place.

Many of the respondents called for the publication of clear, locally relevant evidence to justify the 20 metre width, without this it is felt that this proposal is insufficiently justified and potentially disproportionate, especially for farms facing space constraints.

Several respondents asked for clearer definitions e.g. of a 'waterway', with recommendations to include safeguards for silage bales including dry matter thresholds, wrap checks, and regular inspections. Rather than a rigid rule on distance and stacking heights there was broad support for a risk-based approach, with suggestions to adjust the distance for storing of bales based on factors such as land slope, soil type and proximity to water features, using mapping tools and farm level data to inform site-specific decisions. There were respondents who suggested that 20 metres should be the baseline, that would potentially increase on high-risk sites or decrease with safeguards in place on low-risk sites.

Respondents supported the use of engineered storage solutions such as impermeable, bunded hardstanding with effluent collection as an alternative to wider buffers in field, making compliance more practical where needed. This was particularly favoured by environmental respondents who stressed that distance alone may not be sufficient, especially near sensitive water catchments.

Alternative suggestions included retaining the existing measures as there is the scientific rationale to support a low risk of leaching from silage bales especially for round bales with a dry matter content of more than 250g/kg.

Question 3: Do you agree that stacking silage bales should be limited to a maximum of two high?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1442 responses to this part of the question and 715 responded to the second part of the question.

Table 9 Citizen space responses to Question 3

Option	Total	Percent
Strongly Agree	88	5.96%
Agree	126	8.54%
Neutral	184	12.47%
Disagree	390	26.42%
Strongly Disagree	654	44.31%
Not Answered	34	2.30%

The majority of respondents strongly disagreed with the proposal to limit stacking silage bales to a maximum of two high. The main reasons cited included the lack of scientific evidence linking higher stacking to increased effluent risk. Many of the respondents said that the risk of environmental contamination depends more on bale dry matter and quality than on how high the bales are stacked. High dry matter bales, such as haylage, were frequently cited as producing negligible effluent regardless of how many high they were stacked, while wet bales may leak even when stacked only one or two high.

Respondents noted that if bales were stacked two high, this would increase the footprint of where the bales were stored and could potentially increase the area where rainfall could pick up contaminants, which could actually raise the pollution risk. Many respondents believe that other factors like the storage surface, slope, distance from drains or watercourses and effective yard drainage are the real environmental risk. Some respondents felt that if height

restrictions are needed that this should be included in health and safety guidance rather than regulations.

The responses also highlighted the impracticality of the restriction for farms with limited space and disproportionate given that properly made and stored wrapped bales rarely leak. It was suggested that this proposal would increase costs and workload without significantly improving water quality.

Some respondents supported the proposal, although mainly for precautionary reasons. The views expressed noted that it was a straightforward and conservative measure aimed at reducing the risk of handling accidents and bale collapse. It was pointed out that having a clear limit on stacking height was easier to communicate and enforce compared to a more complex performance-based criteria especially in situations where it might be difficult to verify bale dry matter. A few also believe that restricting the stack height could help prevent wrap failure and reduce the risk of effluent escaping during heavy rain or poor handling in doing so offers an extra layer of environmental protection.

Alternative proposals suggested included basing stacking rules on bale dry matter content (e.g. applying restrictions only to bales with less than 25% dry matter), allowing stacking on hard standing areas with proper drainage, and offering safety training rather than blanket restrictions. Respondents emphasised the need for flexibility, common-sense regulation, and recognition of farmers' expertise in managing their own land.

Written Responses

Table 10 Written responses from individuals, organisations and key representatives to Question 3

Individuals, Organisations and Key Representatives – Responded 36	Total	Percent
Agree	5	14%
Neutral	1	3%
Disagree	30	83%
Total	36	100%

Most respondents strongly disagreed with the proposal to limit stacking silage bales to a maximum of two high. Common themes from the written responses were the same as those received through citizen space.

In addition to those reasons already identified the written responses stressed that it was important to recognise a combination of factors including dry matter thresholds, storage duration, exposure and the frequency in which bales are handled or turned. Respondents also expressed that focus should be on understanding of effluent pathways.

The written responses clearly expressed the concerns in relation to a potential increase in the storage footprint needed on already constrained farmyards. Impacts such as forcing the spread of bales across multiple locations that would require additional internal transportation, raising health and safety risks due to more frequent movements and handling at potentially more isolated points, were noted. In relation to these concerns, they expressed fears around increased costs and labour burden which some feel would be disproportionate to any marginal benefit gained from this proposed measure.

A more flexible approach was called for by those responding, suggesting that higher stacks should be permitted where certain explicit conditions are met such as minimum dry matter or quality standards, use of flat, hard or impermeable surfaces, effective drainage, sufficient distance from a watercourse and regular inspection with prompt remediation action if seepage occurs.

Amongst the responses there was request for clearer expectations, inspection criteria and to establish performance metrics, especially if any staking limits or conditional approach is to be adopted.

For those who support the proposals, mainly environmental sector representatives, it was viewed as a sensible precaution, especially when considered as part of a broader strategy to prevent problems such as bale failure, wrap damage and leakage. This was viewed as important especially in situations where silage is wetter than ideal, handling practices are not perfect or where the conditions at the storage sites are less than optimal. This proposal was supported as part of a suite of measures or stricter controls such as preventing stacking altogether in environmentally sensitive areas, on sloping or permeable ground or where the forage has a low dry matter, rather than a measure on its own.

Regardless of the views of the respondents, they all agreed that the preference is for a graduated compliance pathway with education, advisory support and a commitment to ongoing improvement, escalating to enforcement only where material risks persist and recommended that this is supported by clear technical guidance.

The alternatives suggested included no requirement to amend the existing measures as the rationale is not supported, emphasising that silage bales are low risk of leaching especially for round bale silage where the dry matter content is more than 250g/kg.

Question 4: Do you agree that a reduction in slurry application from 30m³ to 25m³ per hectare in February and 1 – 15 October will reduce run-off risk of surplus nutrients to watercourses?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1439 responses to this question and 762 responding to the second part.

Table 11 Citizen Space responses to Question 4

Option	Total	Percent
Strongly Agree	55	3.73%
Agree	145	9.82%
Neutral	169	11.45%
Disagree	364	24.66%
Strongly Disagree	706	47.83%
Not Answered	37	2.51%

Most replies disagreed with the proposal to reduce slurry application rates from 30m³ to 25m³ per hectare in February and 1–15 October, arguing the measure lacked scientific justification and failed to account for weather variability, soil conditions, and crop need. Many suggested fixed calendar-based limits could increase frequency of applications, soil compaction, and emissions, while imposing financial and logistical burdens on small farms. Concerns were raised about the lack of clarity in the proposal, its potential to reduce farm viability, and the absence of consideration for differing land types and farm size.

Alternative suggestions included adopting a flexible, risk-based approach guided by real-time weather and soil data, offering grants for additional slurry storage, and improving education and advisory support. Respondents also called for a more collaborative and evidence-based strategy that includes accountability of other polluters like NI Water and focuses on practical, farm-driven solutions.

Written Responses

Table 12 Written responses to Question 4

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	4	17%
Neutral	3	13%
Disagree	16	70%
Total	23	100%

While a few respondents supported the principle of reducing slurry application rates in February and October, most either disagreed or expressed significant reservations and thought a more flexible, evidence-based, and technologically advanced approach, responsive to real-time weather and soil conditions, would be more effective in reducing nutrient run-off to watercourses.

A minority of replies supported in general, the proposal to reduce slurry application rates during specific periods, believing it could contribute to lowering nutrient run-off. Nevertheless, even among those in agreement, concerns persisted regarding the adequacy of the proposed reductions and the need for more detailed evidence and implementation guidance.

Furthermore, several respondents said that technological advancements, such as precision spreading and real-time decision support tools, render blanket restrictions obsolete.

In summary, while a minority support reducing slurry application rates during February and October, the prevailing view is that a more flexible, technologically informed, and evidence-driven approach is needed to effectively reduce nutrient run-off to watercourses.

Low Emission Slurry Spreading Equipment (LESSE)

The following questions (5 – 8) deal with the proposals relating to LESSE, the responses to these questions will also be used to help inform the proposed Ammonia Strategy.

Question 5: Do you agree with the proposed amended definition of LESSE to provide clarification and to incorporate the terminology throughout the regulations?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1424 responses to this question with 426 responding to the second part of the question.

Table 13 Citizen Space responses to Question 5

Option	Total	Percent
Strongly Agree	51	3.46%
Agree	133	9.01%
Neutral	384	26.02%
Disagree	321	21.75%
Strongly Disagree	535	36.25%
Not Answered	52	3.52%

The proposed amended definition of LESSE was met with widespread disagreement. Respondents criticised the lack of clarity, scientific justification, and practical feasibility of the definition, particularly for small and family-run farms. Concerns included the financial burden of purchasing LESSE, its unsuitability for certain land types, and the risk of unintended environmental consequences such as soil compaction and pollution swapping. Many felt the tiered approach based on nitrogen output was overly simplistic and unfairly penalised efficient farms.

Alternatives proposed included a risk-based, site-specific approach to LESSE requirements, voluntary adoption supported by grants or low-cost loans, recognition of existing good practices, and improved training and advisory services.

Written responses

Table 14 Written responses from individuals, key representatives and organisations to Question 5

Individuals, Organisations and Key Representatives – Responded 29	Total	Percent
Agree	6	21%
Neutral	4	14%
Disagree	19	65%
Total	29	100%

Similar views were received from Industry Representative Organisations as in Citizen Space around the rationale for refining LESSE and generally opposed further changes to the LESSE definition. In addition, they said that the exclusion of small-scale splash plates ("Splash it") or modifications lacks clear scientific justification and could discourage adoption of LESSE, especially given concerns about animal health and silage quality. Organisational responses stressed that any changes should be evidence-based and accompanied by robust economic impact assessments.

The Environmental Sector noted the need for a robust definition of LESSE to ensure equipment applies slurry at ground level.

The Agri-food sector had similar views to those expressed in Citizen Space and stressed the need for further research and practical consideration of the realities faced by farmers.

Question 6: Do you agree with the proposed tier approach to the introduction of LESSE based on Nitrogen Production per hectare?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1435 responses to this question and 395 responding to the second part of this question.

Table 15 Citizen Space responses to Question 6

Option	Total	Percent
Strongly Agree	32	2.17%
Agree	121	8.20%
Neutral	270	18.29%
Disagree	396	26.83%
Strongly Disagree	616	41.73%
Not Answered	41	2.78%

The proposed tiered approach to introducing LESSE based on nitrogen production per hectare was met with widespread disagreement. Respondents criticised the approach for being overly simplistic, failing to account for farm-specific variables such as land type, weather conditions, and existing mitigation practices. Many felt it unfairly penalised intensive but well-managed farms and imposed disproportionate financial burdens on small and part-time operations. Concerns were also raised about the practicality of implementation, biosecurity risks from shared equipment, and the lack of credible scientific evidence supporting LESSE's impact on water quality.

Alternatives proposed included a risk-based, site-specific approach; earlier implementation for high-risk farms; voluntary adoption supported by grants; recognition of existing good practices; and investment in broader agri-environment schemes or technologies like digesters and separators to both reduce slurry volume and generate renewable energy. Respondents also called for more research into non-agricultural phosphorus sources, such

as sewage and urban runoff, and emphasised the need for fairness, flexibility, and farmer-led decision-making.

Written responses

Table 16 Written responses to Question 6

Individuals, Organisations and Key Representatives – Responded 29	Total	Percent
Agree	5	17%
Neutral	3	10%
Disagree	21	73%
Total	29	100%

Similar views were received from most industry groups as those expressed in Citizen Space. In addition, it is highlighted that the calculation method (based on nitrogen production per hectare) may penalise small, intensive farms and discourage nutrient redistribution. They advocated for simpler, more understandable mechanisms, such as livestock units, and stressed the need for economic impact assessments and support packages. Additional concerns included increased contractor costs, soil compaction, silage contamination, animal health risks, and limited sustainability for certain terrains.

Farm businesses also echoed similar concerns with many fearing that the tiered approach will disincentivise slurry imports, reduce flexibility, and disproportionately burden smaller or marginal farms.

Environmental stakeholders were divided. Some said that the tiered approach does not convey sufficient urgency and recommended earlier, more targeted implementation for high-risk farms. Others questioned the effectiveness of LESSE in improving water quality and warned that excluding large numbers of smaller farms could undermine environmental objectives. They expressed views that the current emphasis on LESSE risks over-prioritising technological fixes. Timing of applications to avoid wet weather events, nature-based solutions of riparian buffers, cover crops, low input grasslands, and multispecies swards were likely to provide a better return on investment.

Agri-food representatives highlighted the need for practical, phased implementation and adequate support for both large and small farms to avoid negative impacts on the wider agri-food economy.

Question 7: Do you agree that all pig slurry should be spread by LESSE from 1 February 2027?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1433 responses this question, with 356 responding to the second part of the question.

Table 17 Citizen Space Responses to Question 7

Option	Total	Percent
Strongly Agree	79	5.35%
Agree	194	13.14%
Neutral	346	23.44%
Disagree	304	20.60%
Strongly Disagree	510	34.55%
Not Answered	43	2.91%

There was considerable opposition to the proposal. Individuals particularly from small and family-run farms highlighted the financial burden, impracticality, and lack of flexibility in the proposal. Key concerns included the high cost of LESSE, limited contractor availability, unsuitability for certain terrains, and the risk of increased runoff due to forced spreading in poor weather. Many felt the proposal ignored existing good practices and disproportionately penalised farms already operating under strict nutrient controls.

Suggested alternatives included a phased or risk-based approach, targeted grant support, exemptions for low-risk or small farms, and recognition of current responsible nutrient management. Respondents also called for clearer guidance, economic impact assessments, and a more collaborative, evidence-based strategy that supports environmental goals without undermining farm viability.

Written responses

Table 18 Written responses to Question 7

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	4	17%
Neutral	2	9%
Disagree	17	74%
Total	23	100%

The Industry Representative Organisations had similar views to those expressed on Citizen Space and highlighted confusion over whether the rule applied to all pig slurry or all pig farms, inconsistencies in proposed start dates, and the lack of clarity for mixed farm enterprises. Additional concerns were expressed for the impact on farmers who import slurry, the feasibility for smaller mixed farms, and the risk of discouraging slurry redistribution. Also, respondents claimed that the pig sector's contribution to ammonia emissions is relatively small and questioned the fairness of imposing earlier requirements on pig farmers raising equality concerns especially if farmers miss out on capital grants due to the timing of the mandate. LESSE will also lead to an increased cost for farmers importing pig slurry, risking the unintended consequence of an increase in use of chemical N fertiliser as importing farms seek a substitution. They said the pig sector is already highly regulated and that the proposal could hinder the redistribution of pig slurry and increase costs.

Pig producers and mixed farms expressed strong concerns about the feasibility and fairness of the early deadline. Many rely on exporting pig slurry to comply with nutrient loading requirements, and the new rule could disrupt these arrangements, particularly for small cattle farms that import pig slurry. There are also worries about the availability of LESSE equipment.

Environmental groups generally supported stricter controls on pig slurry due to its high nitrogen content and mobility. One group recommended bringing forward the mandatory use of LESSE for pig slurry and phasing out derogations, citing the need for urgent action to protect water quality. However, they also stressed the importance of robust monitoring and a twin-track approach that considers farm size and economic viability.

Agri-food processors were concerned about the knock-on effects of the proposal, particularly the risk of increased input costs, reduced competitiveness, and disruption to established nutrient management practices. They called for further research, practical support, and a more gradual transition.

Question 8: Do you agree that on derogated farms all slurry should be spread by LESSE from 1 February 2027?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1428 responses to this question, and 403 responding to the second part of the question.

Table 19 Citizen Space responses to Question 8

Option	Total	Percent
Strongly Agree	82	5.56%
Agree	191	12.94%
Neutral	269	18.22%
Disagree	341	23.10%
Strongly Disagree	545	36.92%
Not Answered	48	3.25%

The proposal to mandate LESSE for all slurry on derogated farms from 1 February 2027 was met with widespread opposition. Respondents cited significant financial burdens, impracticality for certain land types (e.g. steep or wet ground), lack of contractor availability,

and existing good practices already in place on many farms. Many felt the proposal was a “one-size-fits-all” approach that failed to account for farm-specific conditions, infrastructure limitations, and the diversity of farming systems. Concerns were also raised about the impact on small and family-run farms, mental health, and the viability of the agricultural sector.

Suggested alternatives included a phased or risk-based implementation, financial and advisory support, exemptions for low-risk or unsuitable areas, and recognition of current responsible nutrient management practices. Respondents also called for more research, better education, and a collaborative approach that includes other polluters such as NI Water.

Written responses

Table 20 Written Responses to Question 8

Individuals, Organisations and Key Representatives – Responded 24	Total	Percent
Agree	5	21%
Neutral	3	12%
Disagree	16	67%
Total	24	100%

Most industry groups expressed similar views to those in Citizen Space and recommended that any new mandates should be accompanied by adequate grant support and phased implementation.

Derogated farm operators were concerned about the feasibility of meeting the new deadline, particularly given the need to purchase equipment and the risk of supply chain delays. There was also apprehension that the proposed rule could deter farmers from applying for derogations, potentially undermining nutrient management objectives.

Environmental stakeholders supported the removal of derogations, arguing that continued high nutrient loading undermines water quality objectives. They called for urgent action and robust enforcement to ensure compliance and environmental improvement.

Additional Phosphorus Controls

Proposals for additional phosphorus controls were covered by questions 9 and 10 in the consultation.

Question 9: Do you agree with the proposal that the use of chemical phosphorus (P) should be limited to the criteria listed, to prevent surplus phosphorus being applied to land?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1441 responses to this question, and 435 responding to the second part of the question.

Table 21 Citizen Space responses to Question 9

Option	Total	Percent
Strongly Agree	101	6.84%
Agree	236	15.99%
Neutral	228	15.45%
Disagree	335	22.70%
Strongly Disagree	541	36.65%
Not Answered	35	2.37%

Most replies strongly disagreed with the proposal to limit the use of chemical phosphorus (P) to the listed criteria. Key reasons for disagreement included concerns over the lack of scientific justification, economic viability, and practical feasibility, particularly for high-yielding dairy and poultry farms that rely on phosphorus-rich feed. Many felt the proposed limits were overly rigid, failed to account for farm-specific variables such as soil type and crop needs, and would force reductions in stocking rates or require unaffordable land expansion. Respondents also criticised the lack of clarity in the consultation documents and the absence of guidance on calculating P balances.

Suggested alternatives included allowing the Soil Nutrient Health Scheme to run its course, promoting nutrient management training, encouraging the use of straight P fertilisers to correct deficits, adopting a risk-based and site-specific approach, and supporting transitions to extensive, pasture-based systems. There was also strong advocacy for more research, economic impact assessments, and recognition of non-agricultural phosphorus load sources such as sewage and septic systems.

Written responses

Table 22 Written Responses to Question 9

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	4	17%
Neutral	2	9%
Disagree	17	74%
Total	23	100%

A minority of replies from environmental groups and certain agri-food representatives noted strong support for restricting chemical phosphorus use and cited both environmental and economic advantages in reducing surplus phosphorus in soils and watercourses. Supporters advocated for clear guidance, robust advice, transparent data and effective stakeholder engagement to ensure practical transition and implementation.

On the other hand, most respondents opposed or had significant reservations about the proposal highlighting anticipated economic hardships, increased administrative burdens, potential risks to animal health and concerns over the practicality of relying solely on organic manures particularly for smaller or remote holdings. There were widespread calls for flexibility suggesting that chemical phosphorous should be permitted where justified by soil analysis and crop requirements and for the Soil Nutrient Health Scheme to be fully operational and interpreted before restrictions take effect.

Responses proposed targeted use based on soil nutrient data, improved digital nutrient management, comprehensive training, and phased implementation to address biosecurity and logistical challenges. The consensus was that a more flexible, evidence-led approach, attentive to farm-specific needs and accompanied by clearer guidance, practical exemptions, and safeguards for animal health, would be preferable to the current draft, which is viewed as risking unintended negative consequences on farm.

Question 10 A: Do you agree with phasing in a P Balance limit for more intensively stocked farms, operating at nitrogen production at and above 150kg N/ha?

The limits proposed are limit of 10 kg/P/ha/year by 2027

Question 10 B: Do you agree with phasing in a P Balance limit for more intensively stocked farms, operating at nitrogen production at and above 150kg N/ha?

The limits proposed are limit of 8 kg/P/ha/year by 2029

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

For question 10A there were 1441 responses to this question and 528 responding to the second part of this question.

Table 23 Citizen Space responses to Question 10A

Option	Total	Percent
Strongly Agree	47	3.18%
Agree	112	7.59%
Neutral	156	10.57%
Disagree	314	21.27%
Strongly Disagree	812	55.01%
Not Answered	35	2.37%

For question 10B there were 1434 responses to this question, and 510 responses to the second part of the question.

Table 24 Citizen Space responses to Question 10B

Option	Total	Percent
Strongly Agree	45	3.05%
Agree	94	6.37%
Neutral	146	9.89%
Disagree	305	20.66%
Strongly Disagree	844	57.18%
Not Answered	42	2.85%

There was widespread disagreement with the proposal to phase in a phosphorus (P) balance limit of 10kg P/ha/year for intensively stocked farms operating at nitrogen production levels at or above 150kg N/ha. Respondents said that the proposal was overly restrictive, lacked scientific and economic justification, and failed to account for farm-specific variables such as soil type, crop demand, and existing nutrient management practices. Many feared it would lead to forced destocking, reduced productivity, and financial hardship, particularly for pig and poultry sectors while undermining well-managed farms already practising responsible nutrient stewardship. The timeline was deemed unrealistic, and the complexity of calculating a P balance was seen as a barrier to compliance. Many also referenced the need to take into account the impact of sewage discharge from NI Water including the increased number of houses in the Lough Neagh Catchment.

Alternative proposals included adopting a risk-based, site-specific approach, supporting farmers through education, advisory services, and grants, and recognising existing good practices and soil testing. Responses called for more robust research, transparency, and collaboration to ensure environmental goals are met without jeopardising farm viability or food security.

Written responses

Table 25 Written Responses to Question 10A

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	2	9%
Neutral	2	9%
Disagree	19	82%
Total	23	100%

Table 26 Written Responses to Question 10B

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	2	9%
Neutral	2	9%
Disagree	19	82%
Total	23	100%

A minority expressed support for the proposal to phase in a phosphorus (P) balance limit for intensively stocked farms, recognising its potential to address phosphorus surpluses and enhance water quality. However, even among supporters, there was consensus on the need for careful implementation, clear guidance, financial assistance, and a coordinated national strategy to ensure fairness and practicality.

Most, however, opposed the proposed P balance limit in principle, with objections centred on the perceived impracticality of suggested thresholds, particularly for sectors such as dairy, pigs, and eggs, and the potential to induce significant reduction in livestock numbers, business closures, or the need for additional land. Concerns were raised on the lack of consistency and transparency in the calculation methods presented, and fears the measure could distort land value, increase operational costs, and farm viability. Again, there were calls for a more evidence-based, gradual, and adaptable approach, facilitated by stakeholder engagement and technological support.

Respondents also advocated for a comprehensive economic and environmental assessment, as well as a robust scientific review of proposals prior to any implementation. Furthermore, proposals were made for a detailed long-term roadmap, developed collaboratively with stakeholders and supported by ongoing monitoring and adaptive management. The need for

investment in technological solutions, utilising anaerobic digestion and nutrient recovery solutions were highlighted as part of the support required for compliance.

Finally, some respondents asked for a national collective approach to phosphorus management, accounting for all significant sources, including wastewater and domestic sewage, rather than the sole focus being on agriculture. While there was general agreement on the necessity of addressing phosphorus surpluses, opinions diverged sharply on the most effective methods and appropriate pace of change.

Review of Standard Values for calculation of Nitrogen and Phosphorus

The review of Standard Values for the calculation of Nitrogen and Phosphorus values, proposals were addressed in the consultation in questions 11 to 14.

Question 11: Do you agree that the proposed banding of nitrogen excretion rates for dairy cows based on milk yield will ensure more accurate accounting of nutrients in dairy production systems?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1416 responses to this question, with 378 responding to the second part of the question.

Table 27 Citizen Space responses to Question 11

Option	Total	Percent
Strongly Agree	48	3.25%
Agree	128	8.67%
Neutral	275	18.63%
Disagree	315	21.34%
Strongly Disagree	650	44.04%
Not Answered	60	4.07%

Most respondents disagreed with the proposal to band nitrogen excretion rates for dairy cows based solely on milk yield, arguing that it oversimplifies a complex biological and management system. Key concerns included the failure to account for variables such as breed, diet, housing, genetics, and seasonal calving, which significantly influence nitrogen output. Many felt the proposal would unfairly penalise efficient, high-yielding farms and add unnecessary administrative burdens, particularly for smaller or mixed farms lacking resources for detailed record-keeping. There were also fears of data manipulation and unintended consequences like forced destocking or land acquisition.

Alternative suggestions included adopting a multifactorial, science-based model incorporating feed inputs, nitrogen use efficiency, and regional variation; using measurable indicators like Milk Urea Nitrogen (MUN); and supporting farm-specific nutrient management planning with robust soil testing and advisory services. Respondents asked for a flexible, evidence-led approach that recognises existing good practices and avoids undermining farm viability.

Written responses

Table 28 Written Responses to Question 11

Individuals, Organisations and Key Representatives – Responded 22	Total	Percent
Agree	5	19%
Neutral	2	8%
Disagree	16	73%
Total	22	100%

A minority of respondents expressed agreement with the proposed banding of nitrogen excretion rates for dairy cows based on milk yield, considering it a progressive move towards more precise and equitable nutrient accounting. These respondents highlighted the proposal's consistency with current practices in the Republic of Ireland.

On the other hand, the majority response voiced disagreement, citing a range of concerns. Key issues included the increased complexity and administrative burden that the system will impose, particularly on smaller farms, as well as apprehensions that the banding approach might unfairly penalise efficient high-yield herds and distort land markets. Additionally, doubts were raised regarding the reliability of milk yield as the sole metric for determining

nitrogen excretion, given the significant influence of genetics, management, and environmental factors. Respondents also questioned the feasibility of accurately collecting and verifying sensitive milk yield data.

Alternative proposals included the adoption of a more streamlined simplified banding approach, similar to what has been introduced in Ireland, or the maintenance of a single excretion rate with provision for farms to scientifically demonstrate lower yields. Others advocated for the inclusion of additional variables, such as genetics, feed intake, and management practices, to enhance accuracy. There was a strong call for increased support in the form of advisory services, training, and digital tools to assist farmers with compliance.

Several replies proposed pausing the initiative until a modern, centralised nutrient management platform is developed and additional more robust, peer-reviewed data is available.

Question 12: Do you agree that the revised phosphorus excretion rates from dairy cows will ensure more accurate accounting of nutrients in dairy production systems?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1406 responses to this question and 307 responses to the second part of the question.

Table 29 Citizen Space responses to Question 12

Option	Total	Percent
Strongly Agree	39	2.64%
Agree	134	9.08%
Neutral	282	19.11%
Disagree	317	21.48%
Strongly Disagree	634	42.95%
Not Answered	70	4.74%

Most replies strongly disagreed with the proposal. Key concerns included the lack of scientific transparency, failure to account for variation in feeding regimes, breed, and management practices, and the risk of penalising efficient, low-input farms. Many felt the proposal added unnecessary complexity and administrative burden, especially for small and family-run farms, and feared it could lead to forced destocking or increased slurry export requirements without proven environmental benefit.

Alternative suggestions included adopting a flexible, farm-specific approach based on real-time data, soil testing, and precision feeding; supporting whole-farm nutrient management planning; and conducting further research and industry consultation to validate excretion figures. Respondents also asked for policies that prioritise sustainable, pasture-based systems over intensive models, and emphasised the need for collaborative, evidence-led regulation that supports both environmental goals and farm viability.

Written responses

Table 30 Written Responses to Question 12

Individuals, Organisations and Key Representatives – Responded 22	Total	Percent
Agree	5	19%
Neutral	2	8%
Disagree	16	73%
Total	22	100%

A minority of respondents expressed agreement with the proposal, considering it a positive move towards more precise and equitable nutrient accounting. They also noted that the approach aligns with current practices in the Republic of Ireland.

However, most respondents disagreed with the proposed changes. Their principal concerns centred on the lack of robust scientific evidence, the reliance on estimates and assumptions, and the belief that phosphorus excretion is inherently variable, being influenced by factors such as diet, management practices, genetics, and environmental conditions. There was apprehension that adopting a static or revised standard figure could unfairly penalise efficient or progressive farms and would not adequately reflect real-world variation. Many called for a

more dynamic, flexible, and evidence-based methodology, suggesting the inclusion of dietary adjustment factors and formal recognition of efficient feed management practices.

In response, alternative proposals were put forward including, the development of a dynamic system incorporating dietary adjustment factors, undertaking further robust and peer-reviewed scientific research, and conducting widespread slurry sampling before enacting changes. In addition, there were calls for increased advisory support, targeted training, and the provision of digital tools to assist farmers in complying with any new system.

Question 13: Do you agree that the revised standard values for calculation of Nitrogen and Phosphorus for poultry systems will ensure more accurate accounting of nutrients in poultry production systems?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1409 responses to this question with 228 responses to the second part of the question.

Table 31 Citizen Space responses to Question 13

Option	Total	Percent
Strongly Agree	48	3.25%
Agree	128	8.67%
Neutral	418	28.32%
Disagree	289	19.58%
Strongly Disagree	526	35.64%
Not Answered	67	4.54%

Most replies disagreed with this proposal. Key concerns included the oversimplification of diverse poultry systems, failure to account for differences in bird genetics, feed composition, housing types, and manure handling practices, and the risk of overestimating nutrient output, particularly for farms already using precision feeding and environmental controls. Many

feared that rigid standard values would impose unnecessary regulatory burdens, discourage diversification, and penalise well-managed farms.

Alternative proposals included allowing farm-specific data or validated feed conversion models, incorporating dietary adjustment factors, and enabling flexibility through records or audits. Respondents also called for regular review of the values, better guidance, and support for farmers to implement changes fairly and proportionately.

Written responses

Table 32 Written Responses to Question 13

Individuals, Organisations and Key Representatives – Responded 24	Total	Percent
Agree	5	21%
Neutral	2	8%
Disagree	17	71%
Total	24	100%

As with citizen space, the majority of written responses disagreed with this proposal. There were concerns that the proposed values do not adequately reflect the latest scientific evidence or account for the complexity and variability inherent in real world poultry production. Specific issues included the influence on excretion rates of factors such as diet, breed, feed quality, housing and management and a perceived lack of transparency regarding the methodology and data underpinning the revisions. Some respondents advised that the values are based on estimates and cannot be relied on.

Whilst a minority supported the review in principle, they often did so with reservations noting the need for future amendments to address farm level differences. Respondents advocated for a more dynamic and transparent approach suggesting regular updates and a flexible system that accommodates diverse production practices.

Question 14: Do you agree that the revised standard figures for separated manures and slurries will ensure more accurate accounting of nutrients?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1409 responses to this question and 289 responses to the second part of the question.

Table 33 Citizen Space responses to Question 14

Option	Total	Percent
Strongly Agree	36	2.44%
Agree	169	11.45%
Neutral	330	22.36%
Disagree	322	21.82%
Strongly Disagree	552	37.40%
Not Answered	67	4.54%

The majority of respondents disagreed with this proposal. The main reasons cited included the significant variability in nutrient content due to differences in separation methods, slurry composition, feedstock, storage, and handling practices. Many felt that applying generic standard values could misrepresent actual nutrient levels, leading to inaccurate compliance burdens or environmental risk assessments, particularly for farms using advanced or non-typical separation systems. Respondents emphasised that rigid figures could penalise well-managed farms and discourage innovation.

Alternative proposals included allowing flexibility for farm-specific data, encouraging laboratory analysis or validated on-farm measurements, and integrating precision spreading techniques like LESSE. There was also strong support for regular review of the figures, clearer guidance, and a more collaborative, evidence-based approach to nutrient management that reflects real-world farming conditions.

Written responses

Table 34 Written responses to Question 14

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	4	18%
Neutral	2	8%
Disagree	17	74%
Total	23	100%

Several respondents expressed general agreement with the adoption of this proposal. Nevertheless, many of those in agreement stressed the importance of keeping such figures under regular review and advocated for the option to use farm-specific laboratory analyses to achieve greater accuracy in nutrient accounting.

Most respondents disagreed with the use of standard figures, voicing concerns that these values may not accurately reflect the best available scientific evidence or the considerable variability in nutrient content resulting from different separation technologies, management regimes, and farm practices. There were also calls for greater transparency regarding the data sources and methodologies underpinning the standard figures.

In terms of alternative approaches, many respondents recommended that nutrient values derived from accredited laboratory analysis of individual farm manures and slurries should be permissible, arguing that this approach would provide the most accurate data for nutrient management planning. There were also requests for regular update of standard figures if new scientific and industry evidence becomes available, with specific errors in current figures being noted for correction.

Furthermore, respondents emphasised the importance of stakeholder engagement, suggesting that DAERA should liaise closely with industry representatives to ensure that any systems for recording or reporting separated manures and slurries are both practical and manageable at farm level.

Nitrogen Fertiliser

In the consultation questions 15 to 18 covered proposals relating to revised measures relating to Nitrogen Fertiliser. The responses to question 15 will also be used to help inform the proposed Ammonia Strategy.

Question 15: Do you agree that the use of urea should be prohibited unless they contain an inhibitor (protected urea) from 1 January 2026?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1425 responses to this question, with 448 responding to the second part of the question.

Table 35 Citizen Space responses to Question 15

Option	Total	Percent
Strongly Agree	92	6.23%
Agree	145	9.82%
Neutral	206	13.96%
Disagree	325	22.02%
Strongly Disagree	657	44.51%
Not Answered	51	3.46%

Respondents who disagreed with the proposal to prohibit the use of urea without inhibitors from 1 January 2026 raised several recurring concerns: the increased financial burden due to the higher cost and limited availability of protected urea; doubts about the scientific evidence supporting the environmental benefits of inhibitors; and the belief that standard urea, when applied responsibly under suitable weather and soil conditions, poses minimal environmental risk. Many viewed the proposal as bureaucratic overreach that disproportionately affects small farms and undermines agricultural viability.

Alternative suggestions included allowing continued use of standard urea with improved farmer education and best practice guidance, implementing a phased or weather-dependent approach, offering financial incentives or grants for voluntary uptake of inhibitors, and prioritising regulation of other pollution sources such as sewage discharge from NI Water before imposing further restrictions on agriculture.

Written responses

Table 36 Written responses to Question 15

Individuals, Organisations and Key Representatives – Responded 29	Total	Percent
Agree	4	14%
Neutral	5	17%
Disagree	20	69%
Total	29	100%

Similar views were received from the Industry Representative Organisations to those expressed in Citizen Space. In addition, they questioned the restriction of urea due to the region's already low urea usage, and the significant role urea plays as an affordable nitrogen source for farmers, especially since ammonium nitrate is banned. There were also uncertainties regarding the environmental and health effects of urea inhibitors, their shelf life, and their impact on farming practices and livestock. Gaps in research and logistical challenges for suppliers were highlighted. There are concerns about supply chain readiness, the effectiveness and safety of inhibitors. Many recommend a phased approach, like England, with a cut-off date for unprotected urea use in spring. There were some responses indicating that this is a product they would not recommend for use.

The Environmental Sector also highlighted similar views to those expressed in Citizen Space. Additional risks included possible accumulation of urease inhibitors in the food chain and insufficient assessment of their human health impacts. More research was requested before implementation of mandatory measures.

Agri-food processors and suppliers highlighted the need for coordinated policy across the island of Ireland to avoid market distortions and regulatory loopholes. They also stressed the importance of supply chain readiness and the need for clear definitions and practical guidance for farmers.

Question 16: Do you agree with the proposed changes to the Chemical Nitrogen Fertiliser limits?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1431 responses to this question with 424 responses to the second part of this question.

Table 37 Citizen Space responses to Question 16

Option	Total	Percent
Strongly Agree	42	2.85%
Agree	74	5.01%
Neutral	171	11.59%
Disagree	378	25.61%
Strongly Disagree	766	51.90%
Not Answered	45	3.05%

Respondents overwhelmingly disagreed with the proposed changes to chemical nitrogen fertiliser limits, citing concerns over economic viability, reduced crop and forage yields, and disproportionate impacts on small and family-run farms. Key objections included the impracticality of blanket restrictions that ignore farm-specific variables such as soil type, weather, and crop needs; the lack of scientific justification and transparency; and the perceived unfair targeting of agriculture while overlooking pollution from sources like NI Water and urban sewage. Many respondents said that nitrogen is already used carefully due to its high cost and that further restrictions would threaten food security and rural livelihoods.

Alternative proposals suggested included maintaining current nitrogen limits, basing application rates on soil testing and agronomic need, implementing weather-dependent slurry spreading systems, incentivising rather than mandating best practices such as liming and LESSE adoption, and prioritising education, advisory support, and stakeholder engagement over punitive regulation.

Written responses

Table 38 Written responses to Question 16

Individuals, Organisations and Key Representatives – Responded 22	Total	Percent
Agree	1	5%
Neutral	2	9%
Disagree	19	86%
Total	22	100%

Most respondents disagreed with the proposed changes to chemical nitrogen fertiliser limits, with only a small minority in favour. Most replies raised concerns regarding the scientific foundation and transparency of the evidence backing the policy. They feared that the limits could negatively impact grass and silage yields, with the unintended impact of requiring increased imports of concentrate feeds and resultant higher phosphorus surpluses. Further criticism was noted at the lack of tailoring to local environmental conditions or specific farm requirements, with some suggesting that such measures might threaten farm viability.

Many respondents advocated for a more flexible, evidence-based, and locally targeted approach. Recommendations included basing limits on river catchment nutrient loading and local environmental thresholds instead of uniform caps. There were also calls for all supporting research to be peer-reviewed and published prior to implementation. Respondents suggested greater integration of precision agriculture techniques, such as variable-rate application, protected urea, and legumes, alongside robust soil and plant testing, to improve nitrogen use efficiency. The adoption of nature-based solutions and sustainable land management were also emphasised as methods to reduce fertiliser dependency.

Question 17: Do you agree that a limit for processed organic fertilisers from processed manures should be introduced to help support recycling of organic nitrogen?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1403 responses to this question with 234 responses to the second part of the question.

Table 39 Citizen Space responses to Question 17

Option	Total	Percent
Strongly Agree	59	4.00%
Agree	133	9.01%
Neutral	392	26.56%
Disagree	302	20.46%
Strongly Disagree	517	35.03%
Not Answered	73	4.95%

Respondents largely opposed the introduction of a fixed limit on processed organic fertilisers derived from manures, arguing that such restrictions would undermine sustainable nutrient recycling, discourage investment in manure treatment technologies, and contradict circular economy principles. Key concerns included the loss of flexibility to tailor fertiliser use to soil and crop needs, the risk of reverting to less stable nutrient sources, and the potential economic burden on small and family-run farms. Many highlighted that processed manures are more stable, pose lower environmental risks, and should be integrated into whole-farm nutrient plans rather than capped arbitrarily.

Alternative proposals included basing fertiliser use on soil testing and nutrient management plans, promoting transparency in fertiliser composition, supporting research into processed manure efficacy, and incentivising rather than penalising sustainable practices.

Written responses

Table 40 Written Responses to Question 17

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	4	17%
Neutral	2	9%
Disagree	17	74%
Total	23	100%

A small number of respondents expressed support for the proposal, particularly as a means of encouraging nutrient recycling and reducing dependency on chemical fertilisers. However, despite general agreement with the underlying principle, some supporters voiced concerns regarding the absence of clear definitions, the justification for a specific limit, and the need for greater flexibility in implementation.

The majority of respondents disagreed with the proposal, their main objections centred on the perceived lack of scientific rigour in establishing the proposed limits, with calls for any restrictions to be informed by catchment-specific data and environmental requirements rather than uniform production targets. There were also concerns that strict limits could deter investment in nutrient recovery and processing technologies, potentially undermining the aim of promoting nutrient recycling. There were requests for further clarity, guidance, and evidence to underpin the policy.

Alternative suggestions included the adoption of catchment-based limit setting, underpinned by spatial data on nutrient loading and aligned with legal obligations such as the Water Framework Directive. Respondents asked for clear definitions to terms such as "processed organic fertilisers" and "processed livestock manures," alongside detailed guidance on the application and justification of the limits. There was also strong support for a flexible, evidence-based system that allows the use of processed organic manures within comprehensive farm nutrient management plans, provided overall nitrogen limits are respected. Additional recommendations focused on encouraging regular nutrient testing, best practice in storage and application, and incentives for precision application and nutrient recovery.

Question 18: Do you agree that a mandatory liming programme should be introduced for grassland farms?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1430 responses to this question and 434 responding to the second part of the question.

Table 41 Citizen Space responses to Question 18

Option	Total	Percent
Strongly Agree	137	9.28%
Agree	289	19.58%
Neutral	291	19.72%
Disagree	296	20.05%
Strongly Disagree	417	28.25%
Not Answered	46	3.12%

Respondents were opposed to the proposal to introduce a mandatory liming programme for grassland farms. The main reasons cited included the variability of soil pH across farms, with many already conducting regular soil testing and applying lime as needed; concerns over unnecessary costs and workload where liming is not required; and environmental risks such as nutrient imbalances and phosphorus leaching from over-liming. It was also highlighted that mandatory schemes often lead to inflated lime prices, reduced biodiversity in ecologically sensitive areas, and increased stress and administrative burden on farmers.

Alternative proposals focused on voluntary, advisory-led approaches based on soil analysis, education and training through schemes like SNHS, and targeted support for farms with proven acidic soils. Many called for DAERA to prioritise flexibility, evidence-based decision-making, and farmer-led nutrient management planning over blanket mandates.

Written responses

Table 42 Written Responses to Question 18

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	4	17%
Neutral	2	9%
Disagree	17	74%
Total	23	100%

A minority of respondents expressed support for the proposal, generally advocating for a phased and flexible implementation, with significant stakeholder input to ensure the programme's effectiveness and acceptability.

However, most respondents were opposed to a mandatory liming approach. Concerns raised, centred on preference for educational initiatives, financial incentives, and voluntary participation based on the results of soil analysis and the specific requirements of individual farms. Practical challenges were also heavily emphasised, including the difficulties of implementing liming on conacre land, issues relating to weather conditions, and the financial burden associated with compliance. Additional concerns were raised regarding the risks of over-liming, potential nutrient leaching, and the possible negative impacts on sensitive habitats. Many asked for increased research, broader stakeholder consultation, and greater clarity within regulatory frameworks before any such programme is considered.

Alternative proposals were put forward by several respondents. There was strong support for basing liming decisions on up-to-date soil analysis and expert, site-specific advice as opposed to a universal policy. Additional suggestions included the implementation of buffer zones around environmentally sensitive areas and the establishment of robust advisory frameworks to mitigate unintended ecological consequences. Many advocated for continued research into optimal soil pH for specific sward types and focused stakeholder engagement to refine policy direction.

Derogations

Questions 19 to 22 posed questions regarding the derogation within the consultation document.

Question 19: Do you agree that controllers who are proven to have submitted false or misleading nutrient management accounts, should not be eligible to re-apply for a derogation, in the following year?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

There were 1422 responses to this question with 303 responses to the second part of the question.

Table 43 Citizen Space responses to Question 19

Option	Total	Percent
Strongly Agree	126	8.54%
Agree	244	16.53%
Neutral	443	30.01%
Disagree	215	14.57%
Strongly Disagree	394	26.69%
Not Answered	54	3.66%

Many respondents disagreed with the proposal to disqualify controllers from reapplying for a derogation if they were found to have submitted false or misleading nutrient management accounts. The most common reason was in relation to the complexity of nutrient accounting, where honest errors such as clerical mistakes or misunderstandings forms are bound to happen. It was widely felt that for these reasons an automatic ineligibility for the following year was disproportionate.

Some respondents felt that the proposal was too severe and inflexible and that the one year ban does not account for intent and that sanctions should be graduated and proportionate to the severity and intention behind the mistake. There were also concerns expressed that this

proposal places an unfair focus on farm paperwork while other pollution sources such as sewage discharges, may also contribute significantly to nutrient pressures.

Those in favour of stronger sanctions, said that robust measures are needed to protect the integrity of the derogation system. It was maintained that the derogation is a benefit and that an effective deterrence is necessary to prevent falsification, thereby upholding public confidence in compliance standards. The supportive comments stated that submitting of false records undermines the regulatory regime and that loss of eligibility in the following year is an appropriate consequence. Some showed support for stronger sanctions where the falsification was deliberate, suggesting ending the derogation immediately or possibly for longer than one year.

Respondents also emphasised the mental and administrative burden caused by increasing paperwork and inspections.

As alternatives, they proposed a more supportive approach including education, guidance, and flexibility in enforcement. Suggestions included a warning system, where there would be a period to allow for corrections to made or requirement of remedial training before a decision is made on ineligibility. The need for a case-by-case assessment and the right of appeal were highlighted as important safeguards, with suggestions for an independent review panel to distinguish between fraud and honest mistake, and to consider mitigating circumstances such as illness, bereavement, or technical issues.

Written responses

Table 44 Written responses to Question 19

Individuals, Organisations and Key Representatives – Responded 22	Total	Percent
Agree	11	50%
Neutral	2	9%
Disagree	9	41%
Total	22	100%

Those responding to this question in the written responses, showed support for this proposal. In general, this was seen as being essential in order to maintain the integrity of the derogation regime and maintaining public confidence in water quality protection. It was emphasised that it was important that there are clear and predictable consequences to ensure fairness for those who comply with the rules, particularly since the derogation permits higher nutrient loadings. The one year ineligibility by those in support of this measure, was seen as the minimum necessary, but where deliberate or repeated falsification occurred it should be longer. These respondents highlighted the need for credible enforcement, pairing sanctions with risk-based inspections, spot checks and improved digital audit trails to ensure that any penalties are applied consistently and transparently.

Respondents who disagreed with this proposal, did so on the grounds that the proposal contained insufficient details. Many respondents sought for clarification on definitions to distinguish “False” from “Misleading” and clear criteria for materiality. The inclusion of practical examples to help clarify the difference between deliberate deception and honest mistakes arising from complex regulations, misunderstanding by farmer or the adviser, or simple data-entry errors. There were concerns raised around the burden of and standard of proof, with calls for transparent criteria outlining what is “proven” misconduct, who would be responsible for adjudication and what evidentiary standards would apply.

Respondents advocated for expanded guidance and training, including clearer templates, worked examples, reliable helpline and adviser support, and stable implementation timelines to help farmers meet compliance requirements. It was stressed that there was a need to reduce error-prone complexity in calculation methods and to avoid frequently rule changes, which undermine previous learning and create confusion.

Many of the written responses when responding to this question also responded to other proposals in this section of the consultation including adviser liability. Both individuals and organisational respondents raised concerns about the impact of extending liability to advisors or consultants. Warning that increased risk or ambiguity in adviser responsibilities could diminish advisory capacity and increase costs, ultimately making it harder for smaller farms to access the support needed to improve data quality. There was a preferred approach to keep accountability with the person in control of the nutrient accounts, while promoting

standardised adviser practices through clear guidance, templates and quality assurance, rather than punitive measures.

There was also some distinct feedback from some environmental groups going further, challenging not just the sanction itself but the underlying premise of derogations. It was said that as a result of the current water quality data or trends, the statutory obligations justify ending derogations altogether. If the derogations do remain in place, there was a call for more stringent consequences for falsification.

Stakeholders recommended focusing inspections and enforcement where the risk of discrepancies or nutrient intensity was greatest to ensure resources are used effectively. Some respondents also suggested that digital solutions, such as validation rules within submission systems could help catch non-wilful errors early and provide robust audit trails for accountability.

Question 20 A: Do you agree that the date for the submission of derogation accounts should be set administratively, therefore agreeing to amend the wording in the legislation to be 'by a date specified by the Department'?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1401 responses to this question and 210 responded to the second part of the question.

Table 45 Citizen Space responses to Question 20A

Option	Total	Percent
Strongly Agree	44	2.98%
Agree	140	9.49%
Neutral	522	35.37%
Disagree	263	17.82%
Strongly Disagree	432	29.27%
Not Answered	75	5.08%

Respondents who disagreed with the proposal to set the submission date for derogation accounts administratively and amending the legislation to read “by a date specified by the Department”, expressed strong concerns about fairness, practicality, and transparency. Many felt that administratively set dates could lead to uncertainty, short notice, and increased stress, particularly during already busy periods like January. Smaller and family-run farms were seen as disproportionately affected due to limited access to consultants and administrative support.

There was a strong preference for fixed, legislated dates, which many believed provided greater clarity, predictability and fairness. This preference was commonly linked to trust in the process and a desire for greater transparency. Respondents feared that such changes would erode trust, increase red tape, and offer no clear environmental or operational benefit.

Weather and seasonality were also recurring themes, with fears that administrative decisions about deadlines might not reflect the practical realities faced on farms throughout the year. Governance issues were mentioned particularly concerns that too much discretion would rest with the Department, and many expressed a wish for more consultation with farming organisations. In addition, respondents noted the importance of aligning deadlines with key planning and decision-making cycles, such as soil testing, livestock counts and accounting periods.

On the other hand, those supporting the proposal recognised the flexibility in the proposal for the Department to adjust to exceptional circumstances and manage processing more effectively. It was noted that this would enable scope to co-ordinate with other programming timings in any given year.

Alternatives proposed were to retain the current fixed deadline (1 March) in legislation, with emergency powers for the Department to extend it under defined circumstances (e.g. extreme weather), provided there is clear communication and adequate notice. Other suggestions included offering an optional early submission window, improving guidance and reminders, and ensuring any changes are well-consulted and transparently communicated.

Written responses

Table 46 Written responses to Question 20A

Individuals, Organisations and Key Representatives – Responded 9	Total	Percent
Agree	5	56%
Neutral	0	0%
Disagree	4	44%
Total	9	100%

In the written responses received there were very few who expressed an explicit response to this question. The views expressed show a closely balanced response in agreement and those disagreeing with the proposal. In the written responses the views expressed were the same as those expressed through citizen space, with those who supported the proposal valuing the flexibility of an administrative provision, while others preferred a fixed legislative date, for certainty.

There was an emphasis on supply chain feasibility, avoidance of unintended consequences and ensure that decision arrive in time to support operational planning. With any changes to the deadlines, a requirement for timely and clear guidance.

Question 20 B: Do you agree to bring the closing date for derogation application forward from 1 March to 31 January?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1393 responses to this question and 236 responded to the second part of the question.

Table 47 Citizen Space responses to Question 20B

Option	Total	Percent
Strongly Agree	42	2.85%
Agree	80	5.43%
Neutral	466	31.66%
Disagree	338	22.96%
Strongly Disagree	467	31.73%
Not Answered	79	5.37%

When responding to this question, respondents advised that January is already considered a particularly demanding month for many involved in the sector, with heavy workloads, vital planning tasks and financial year-end activities and access to adviser support is often limited. It is the view of many respondents that moving the date to this period would add to the administrative burden and would increase the risk of mistakes or late submissions, especially given the compressed timeline following the holiday period. It was highlighted that unpredictable weather and ongoing operational uncertainties, such as the need for more time to confirm livestock numbers, land availability, and the impacts of TB related animal movements, further complicate compliance.

In addition, there were concerns that necessary data such as December stock counts, are often not visible in systems until after the new year, creating dependencies that could delay or disrupt a timely submission. Respondents believed that this proposal would disproportionately affect small and part-time farms, who struggle to afford consultant support or adapt to the new schedule.

Another point raised was to do with alignment to other deadlines with other agricultural schemes and the broader farming cycle to ensure smooth operations. Some respondents also noted concerns about how these changes may interact with other rules, such as the 28-day deemed-consent provision, which adds another layer of complexity for those affected.

For the minority who supported this proposal, reasons for support included that an earlier submission could in fact aid administrative processing and bring forward decisions, therefore helping with forward plannings for the season.

Alternative suggestions put forward included retaining the 1 March as a statutory deadline. The possibility of an optional early-submission window from January with better communication and reminders provided. It was suggested that if change was necessary to consider a later fixed point (e.g. late February), or to maintain the current date but improve processing. Finally, another proposal was to permit year-round applications or a wider submission window where business events (e.g. TB restrictions, land changes) can be reflected upon.

Written responses

Table 48 Written responses to Question 20B

Individuals, Organisations and Key Representatives – Responded 10	Total	Percent
Agree	4	40%
Neutral	0	0%
Disagree	6	60%
Total	10	100%

As with the previous question the written responses were not unsimilar to those received through citizen space. With the responses slightly more towards disagreeing with the proposal, primarily due to January workload. Reasons outlined for not bringing forward to January include housing and stock management, accounts preparation, bottlenecks for advisors or contractors in January. As a consequence, this could lead to rushed applications resulting in errors, bring additional administrative burden at an already busy period, especially for smaller farms.

It was also suggested that tighter timelines combined with other proposals within the consultation could discourage derogation applications particularly among smaller operations with limited administrative capacity.

Another concern raised was relating to Departmental resources to cope with the screening of application, that if this was not sufficiently resourced or the process streamlined there was a risk of applications “queueing” earlier rather than being resolved earlier. The issue of limited digital capacity was also raised as a concern, citing patchy rural connectivity and reliance on third party agents.

Question 21: Do you agree that the current requirement for a nutrient management account must be supported by a valid soil analysis?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1414 responses to this question and 221 responses to the second part of the question.

Table 49 Citizen Space responses to Question 21

Option	Total	Percent
Strongly Agree	82	5.56%
Agree	378	25.61%
Neutral	334	22.63%
Disagree	256	17.34%
Strongly Disagree	364	24.66%
Not Answered	62	4.20%

On balance, respondents generally disagreed with this proposal however a meaningful minority agreed, often with conditions or caveats.

Respondents who disagreed with the proposal that every nutrient management account must be supported by a valid soil analysis raised concerns about cost. That the extra expense of sampling and the increase bureaucracy do not reflect the realities of farm life, they expressed particular concern that smaller farms would be hit the hardest.

Practical challenges were also significant, noting specifically busy periods in the farming calendar, limited contractor availability, unpredictable weather and difficulties with IT access or skills all make compliance tough.

Some respondents questioned the validity and consistency of soil testing itself, citing personal experience with variable laboratory results, uncertainty about the accuracy of

Department commissioned sampling, and doubts over certain testing methods, such as whether Olsen P method accurately reflects plant-available phosphorus in all soil types.

A meaningful minority supported the mandatory soil analysis, emphasising the importance of evidence based nutrient management. These respondents believed that linking fertiliser application to measured need would help prevent over-application, especially phosphorus and would protect water quality. They viewed soil analysis as a valuable basis for planning and accountability, making nutrient management more consistent and auditable, with some highlighting the Soil Nutrient Health Scheme as a positive step forward. There remains a desire for conditions to be attached, many requested that soil tests have a time-limited validity (e.g. no more than four years old), called for departmental support or funding, and stressed the need for clear guidance on what constitutes a valid analysis.

As alternatives, respondents proposed a more flexible, risk-based approach: soil testing should be encouraged through advisory schemes or subsidies, required only where nutrient loading exceeds defined thresholds, and complemented by farmer knowledge and existing data. This would ensure environmental protection without imposing blanket mandates.

Written responses

Table 50 Written responses to Question 21

Individuals, Organisations and Key Representatives – Responded 19	Total	Percent
Agree	14	74%
Neutral	0	0%
Disagree	5	26%
Total	19	100%

Many of the respondents discussed soil analysis positively in in related context, such as liming and use of Soil Nutrient Health Scheme data, but only a minority directly responded to this specific consultation question.

There is broad recognition among stakeholders that soil testing represents sound agricultural practice, especially when it comes to managing lime applications and targeting phosphorus use. While this principle is widely accepted, there are notable reservations about making soil

testing a legal requirement. The concerns raised were less about scientific merit and more about whether or not a blanket mandate is practical or proportionate. While there was strong support for making decisions based on soil test results, there was significant resistance to enforcing a rigid, one-size-fits-all rule for all farms and fields at all times. These fears may be more specific to other related matters rather than this specific question.

Stakeholders have asked for clear definitions around aspect such as what exactly constitutes a “valid soil analysis”, the age and frequency of tests, proper sampling procedures, field representativeness and laboratory accreditation. Some respondents expressed concern that retests every four years might overlook the differences both within and between farms, as well as ignoring changes in crop rotation, therefore incentivising ritualistic compliance over responsive management. The general consensus was that validity criteria should be clearly set, but with flexibility to tailor requirements based on soil type, farm enterprise, recent testing history and local environmental sensitivity.

Many respondents raised concerns about the extra expense of testing and the potential for paperwork duplication, especially where soil testing is already standard practice could be problematic. Practical challenges such as weather conditions, the availability of qualified contractors, and the quality of sampling all add to the difficulty of meeting tight compliance deadlines.

Within the responses there is a strong preference for allowing the Soil Nutrient Health Scheme and farmer training initiatives to lead the transition towards improved soil management.

Respondents highlighted challenges related to conacre land, where farms renting the land often lack access to soil test results held by landowners, this would make compliance difficult for those fields under their management.

Data integrity and public confidence were important to all respondents, with support for standardising sampling methods, laboratory procedures and including spot-checks to guard against poor sampling practices. This was seen as essential for maintaining trust in records, particularly given ongoing concerns about water quality and the health of rivers and lakes. It was highlighted the importance of safeguarding how Soil Nutrient Health Scheme data is

used. This was a need to uphold the advisory intent and previous assurances that Soil Nutrient Health Scheme data would not be used for enforcement in ways that could erode trust.

In relation to the Soil Nutrient Health Scheme data and areas of conacre land, it was suggested that a simple consent-based data-sharing protocol between landowners and managers along with fallback testing options when historical results are unavailable, ensuring that good-practice operators are not penalised for issues beyond their control.

Question 22: Do you agree that the circumstances for when an application will be 'deemed to be granted' after 28 days will be amended to allow further time to assess the likelihood of significant effects on Designated sites?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1391 responses to this question with 188 responding to the second part of the question.

Table 51 Citizen Space responses to Question 22

Option	Total	Percent
Strongly Agree	36	2.44%
Agree	135	9.15%
Neutral	523	35.43%
Disagree	253	17.14%
Strongly Disagree	444	30.08%
Not Answered	85	5.76%

There was a significant opposition to this proposal based on the citizen space responses and a substantial amount remaining neutral, while a minority support this proposal.

In respondents disagreeing with this proposal, there were many who raised concerns about fairness, certainty and risk in farm planning if the 28-day decision deadline was extended. The reasons given for these concerns highlighted that farm businesses rely on this clear deadline to co-ordinate important operational activities such as stocking, storage and input purchases. Extending the period was frequently seen as introducing “red-tape”, additional stress and administrative burdens for farm businesses. Some of those responding noted that in doing so it creates an imbalance, as farm businesses are expected to meet deadlines, while the Department could gain what was viewed as an open-ended time to make decisions.

The most common view expressed by respondents was that decisions should be achievable within the existing 28 days. If extra time was necessary, it should only be allowed in exceptional circumstances, strictly limited in duration and justified.

Many respondents expressed their concerns on what this would mean for them as a majority of derogated farms would be within 7.5km of a designated site.

A majority of respondents who expressed a neutral view did not provide any further information on their views. Of those who responded to the second part of the question, some wanted to understand in what circumstances would an extension be required, or what it would mean to them. While others indicated that the derogation system does not apply to them.

Although the minority opinion was supportive of this proposal some respondents did provide reasons for their support. Environmental due diligence was cited as the main reason for their support. It was said that 28 days may not be enough time to properly assess the potential significant effects on protected habitats.

As alternatives, respondents proposed retaining the 28-day rule but allowing a clearly defined and limited extension period (e.g. 14 or 21 days), with mandatory written notification explaining the reason for delay and the expected decision date.

Written responses

Table 52 Written responses to Question 22

Individuals, Organisations and Key Representatives – Responded 22	Total	Percent
Agree	9	41%
Neutral	1	5%
Disagree	12	55%
Total	22	100%

In the written responses received there was a strong emphasis on process discipline and certainty, particularly among farmer businesses and agri-food operators. These responses stressed that predictable, short timeframes for decision-making are critical for seasonal planning, hiring contractors and managing cash flow. They expressed concerns that open-ended extensions could create uncertainty, and if additional time is necessary, it is essential that the criteria is clearly defined and fixed timelines rather than open-ended timeframes.

Operational stakeholders, called for proportionality and practical deliverability across the proposals within the consultation. In doing so, they advocated for risk-based targeting instead of blanket rules, factors that should be considered include soil type, slope, proximity to water, livestock density and local weather conditions to determine the level of scrutiny. In doing so this would allow routine, low-risk cases to be determined with only sensitive cases going through a thorough assessment. With many respondents advising that the increased restrictions and delays could undermine economic viability, reduce livestock market activity and impact the rural communities.

Respondents noted that there was insufficient detail within the consultation to fully comment on this proposal, others mentioned that depending on the actions required after such an assessment may overlap with other policies such the Ammonia Operational Protocol. It is also mentioned within responses relating to habitat regulation assessments that farm business are not new developments and therefore are not causing any new or additional impacts on designated sites and that potential improvements to these farm businesses are prevented through the planning process.

Support for this proposal mainly came from the environmental and recreational sectors, for both environmental and legal perspectives to allow more than 28 days for assessments, robust and defensible processes are essential for meeting habitat regulations. They said that a 28 day rigid timeline can lead to rushed decisions especially in areas already facing nutrient pressures.

There were distinct arguments from the environmental sector opposing the continuation of the Derogation system. In doing so, it was their argument that the derogation was only ever meant to be a temporary measure and that allowing farm businesses to operate at a higher nutrient loading limit will lead to a continuation of nutrient accumulation in soils and undermine other proposed measures. They also emphasised the need to comply with legal obligations under both the Water Framework Directive and habitats Regulations.

Many respondents across different views, were wary of procedural adjustments that increased uncertainty. If extra time is deemed necessary in high-risk scenarios, they asked for well defined, transparent expectations, objective triggers for extensions, maximum limits on any additional time and clear milestones.

Multiple submissions also suggested that farm-level permissions should be considered alongside broader sources of environmental pressure, such as wastewater and septic discharges, within comprehensive catchment recovery plans. Respondents mainly from the environmental sector suggested that derogations should not be granted in areas where the river catchment is already exceeding its critical threshold. In addition to this at least one respondent suggested that farm businesses should have to demonstrate how they would contribute to catchment restoring its favourable condition under the Habitats Regulations and Water Framework Directive Regulations.

Across the responses there were suggestions of tiered, risk-based approach, where low-risk applications are expedited and resources are focused on sensitive location or activities, using proportionate evidence requirements.

Storage Requirements

Consultation questions 23 to 25 covered questions relating to storage requirements, including raising awareness, pre-notification before construction and fixed covers.

Question 23: Do you agree that more information is needed to help understand the storage requirements under NAP?

If so, please advise how best you think this information could be provided:

(a) In person

(b) Newsletters or mailshots

(c) Online – Webinar

(d) Social Media

(e) Other please specify

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1373 responses to this question, 1074 providing an indication on how best the information could be provided, 114 answering to other and 132 responding to the last part of this question.

Table 53 Citizen Space responses to Question 23

Option	Total	Percent
Strongly Agree	395	26.76%
Agree	516	34.96%
Neutral	224	15.18%
Disagree	65	4.40%
Strongly Disagree	173	11.72%
Not Answered	103	6.98%

Table 54 Citizen Space responses to Question 23 broken down by option choice

Option	Total	Percent
In Person	550	37.26%
Newsletters or mailshots	200	13.55%
Online- Webinar	174	11.79%
Social Media	150	10.16%
Not Answered	402	27.24%

Respondents who disagreed with the proposal that more information is needed to help understand the storage requirements under NAP expressed concerns that the proposal would introduce unnecessary bureaucracy, duplicate existing planning and regulatory processes, and fail to address the real barriers to compliance, particularly the difficulty in obtaining planning permission for new slurry storage facilities. Many felt that farmers already manage storage responsibly and that the issue lies more with systemic obstacles such as planning delays and lack of coordination between statutory bodies. Respondents also criticised the lack of clarity and consistency in the consultation documents, which they felt made it difficult to understand the proposals and respond meaningfully.

As alternatives, they suggested improving the planning system, offering clearer and more accessible guidance, and providing support through advisory services rather than imposing additional administrative burdens. There was also strong support for a more flexible, farm-specific approach that recognises existing good practice and avoids one-size-fits-all mandates.

Written responses

Table 55 Written responses to Question 23

Individuals, Organisations and Key Representatives – Responded 21	Total	Percent
Agree	16	76%
Neutral	2	10%
Disagree	3	14%
Total	21	100%

Most respondents agreed that additional information is required to enhance understanding of the storage requirements under the NAP. There was consensus that communication should be transparent, consistent, and easily accessible. Many respondents advocated for a blended approach to information dissemination, utilising a combination of in-person events, newsletters or mailshots (including letters), online webinars, social media, and agricultural press. This multi-channel strategy was seen as essential to accommodate the diverse preferences and needs within the farming community, particularly given variations in age, digital literacy, and learning styles.

In-person events were highlighted as the most effective means of knowledge transfer, especially for older farmers and those less comfortable with digital platforms. Newsletters and mailshots (including letters) were also valued for their ability to reach individuals who may have limited internet access. On the other hand, younger farmers were identified as more likely to benefit from online discussions, webinars, and social media communications. Several respondents suggested that local and agricultural newspapers, as well as a dedicated smartphone application, could further enhance the reach and effectiveness of communications.

A recurring theme among the responses was the frustration with planning restrictions, particularly those related to ammonia and designated sites, which were seen as significant barriers to constructing or upgrading storage facilities. Many respondents said, while improved communication is necessary, it must be accompanied by practical changes to planning policy to enable farmers to comply with the NAP requirements. Some also highlighted the need for guidance to address exceptional circumstances, such as adverse weather events or disease outbreaks, which can impact storage needs.

A minority of respondents were neutral or did not see the need for further information, instead focusing on technical critiques of the proposals or expressing opposition to specific regulatory changes, such as the introduction of pre-notification requirements for new slurry storage.

Question 24: Do you agree that pre-notification of slurry storage will help make sure that facilities are constructed on an appropriate site and are compliant with the regulations?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1417 responses to this question with 282 responding to the second part of the question.

Table 56 Citizen Space responses to Question 24

Option	Total	Percent
Strongly Agree	110	7.45%
Agree	282	19.11%
Neutral	305	20.66%
Disagree	287	19.44%
Strongly Disagree	433	29.34%
Not Answered	59	4.00%

Through the responses received through citizen space just under half opposed the proposal requiring pre-notification of slurry stored prior to construction. Just over a quarter supported the measure and a fifth remained neutral to the proposal.

Respondents who agreed with the proposal who provided additional information or reasons for doing so, highlighted that this would enable scrutiny of plans prior to construction, to ensure that projects were properly located and compliant with regulatory requirements. In doing so, would allow the Department to catch any potential issues early. Some respondents emphasised the importance of risk management and enforcement, asking for independent inspections and engineering sign off for new storage builds, this was as well as an ongoing inspection regime for older tanks to prevent leaking.

Making pre-notification was supported as a mandatory measure only for newly constructed or rebuilt stores with a time-bound approval process to avoid unnecessary delays.

In addition to this a response suggested that complementary nature-based measures could be additional mandatory measures, such as incorporating buffer strips and sustainable drainage features near storage facilities. Grant support was also proposed to make compliance achievable without imposing excessive costs.

Those respondents who were neutral and provided reasons for doing so, indicated that the effectiveness of pre-notification largely depended on how it would be implemented. Some respondents sought clarity on whether this was in addition to, after or part of the planning process. They expressed that this would only be beneficial if the Department addresses existing planning and approval delays and supplies clear, accessible guidance. As part of those responses concerns were raised around inability to achieve planning approval for new slurry stores. There was also some who questioned if there was the expertise within the Department to assess if the construction was fit for purpose.

The concerns raised by those disagreeing with the proposal were that this would increase the administrative burden and cause significant delays, potentially slowing down or even preventing construction or upgrading of essential storage tanks. There were multiple references to previous experiences with lengthy or uncertain approval processes, and several respondents noted that such delays could ultimately harm the environment if crucial infrastructure cannot be built or improved in a timely manner.

Additionally, many respondents said that planning controls are already in place and introducing pre-notification would simply duplicate existing regulatory requirements adding unnecessary bureaucracy. Some asked why the planning process could not serve as the single approval route.

Other concerns such as, the costs and viability were major themes reoccurring across the consultation responses especially for small and part-time farm businesses. Issues of fairness and policy focus were also mentioned, with many respondents suggesting that efforts should target other pollution sources particularly sewage infrastructure, instead of imposing additional requirements solely on farm businesses.

There was doubt regarding the effectiveness of pre-notification in improving compliance. Some believed that establishing clear standards, providing grants, and conducting inspections would be more effective tools for achieving environmental goals than introducing further procedural steps. Although opposed to the mandatory requirement some would support a voluntary notification option for farmers who want reassurance or technical advice before proceeding. It was felt that this would be especially helpful for complex or high-risk sites, but should not become mandatory or create delays for straightforward projects.

Alternative suggestions included converting slurry to biogas, improving liaison with planning authorities, and offering grants or incentives rather than imposing inspections or delays.

Written Responses

Table 57 written responses to Question 24

Individuals, Organisations and Key Representatives – Responded 61	Total	Percent
Agree	8	13%
Neutral	1	2%
Disagree	52	85%
Total	61	100%

In the written responses, individuals responding directly to this question are overwhelmingly opposed to this proposal. Organisations and Key representatives responding were more of a mixed view (9 disagreeing, 6 agreeing and 1 neutral).

Those who responded directly to the question and disagreed with the proposal, raised similar concerns to those responding through citizen space. Highlighting concerns that a mandatory pre-construction system would duplicate existing planning procedures, which already involve thorough scrutiny of both location and design with input from the Northern Ireland Environment Agency (NIEA). It was felt that introducing another notification requirement was described as a 'second gate', contributing to additional bureaucracy without delivering clear environmental benefits.

Many felt that enforcing a fixed 28-day notice period would be impractical, given the realities of weather conditions, availability of contractors, and the unpredictable nature of

groundworks. There was also apprehension about the lack of clarity surrounding what exactly constitutes “construction” for instance, whether groundworks or tank installation are included, potentially creating compliance pitfalls for applicants. These were also raised in commentary provided through citizen space.

Respondents asked for evidence that pre-notification would prevent environmental incidents that existing planning and inspection processes do not already address. Without such proof, this step risks being seen as ‘process for process’ sake’ or an overreach by the Department, rather than a measure that genuinely improves outcomes.

Those who offered support for pre-notification again emphasised its potential as an earlier checkpoint for risk management, offering a chance to identify and address siting or design concerns before construction begins. This proactive approach was seen as a way to reduce the likelihood of non-compliant builds and minimise environmental incidents. However, it was essential that the process is effective and does not introduce unnecessary delays. It was stressed that this must be accompanied by effective monitoring and enforcement to ensure impact.

Representatives from the environmental sector in addition suggested the inclusion of mandatory buffer strips or sustainable drainage systems around slurry storage tanks as additional protection.

Finally, while notification can play a role in improving oversight, some respondents propose periodic ‘MOT style’ integrity checks for aging storage facilities, noting that these ongoing assessments are necessary to address risks that notification alone cannot resolve.

Question 25: Do you agree that above ground stores should only have a tensioned fitted / fixed cover only?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1410 responses to this question with 249 responding to the second part of this question.

Table 58 Citizen Space responses to Question 25

Option	Total	Percent
Strongly Agree	60	4.07%
Agree	253	17.14%
Neutral	473	32.05%
Disagree	286	19.38%
Strongly Disagree	338	22.90%
Not Answered	66	4.47%

The main concerns expressed include frustration with bureaucratic delays and planning restrictions, perceived government overreach, and a lack of practical support for farmers. Respondents criticised the Department for slow permission processes and questioned whether planning authorities would cooperate effectively. Many felt that existing slurry pits already meet needs and that imposing further cover requirements would be impractical without financial assistance.

Alternative proposals suggested included converting slurry storage to biogas systems and allowing more flexibility in siting and approval processes to better suit farmers' operational realities.

Written Responses

Table 59 Written responses to Question 25

Individuals, Organisations and Key Representatives – Responded 20	Total	Percent
Agree	7	35%
Neutral	3	15%
Disagree	10	50%
Total	20	100%

A range of views were expressed in response to the proposal that above ground stores should be limited to tensioned fitted or fixed covers. Several respondents were supportive of the proposal, highlighting that such covers are an effective means of reducing ammonia emissions from slurry storage. They referenced evidence that impermeable covers can achieve substantial reductions in emissions, thereby contributing to improved air quality. In addition, these respondents noted that fitted covers prevent rainwater ingress, which reduces the risk of tanks overflowing and thus helps to mitigate point-source pollution in adjacent watercourses. This, in turn, supports the objectives of the Water Framework Directive by limiting nutrient loads in sensitive catchments. Some also welcomed the integration of nature-based solutions, such as constructed wetlands and riparian buffer zones, alongside infrastructure measures to provide long-term resilience against nutrient runoff.

Others disagreed with the proposal to mandate only tensioned fitted or fixed covers expressing similar views to those expressed by the respondents in Citizen Space citing the need for flexibility to accommodate different farm systems, sites, and budgets. It was said that other types of covers, such as floating covers, geotextile sheets, or rainwater harvesting roofs, can also deliver emissions reductions and environmental benefits, and that a one-size-fits-all approach is not appropriate. Some respondents pointed out that technological advances in manure treatment mean that not all materials stored require the same level of emission control, and that alternative covers may be equally effective and more cost-efficient. Concerns were also raised regarding the durability of tensioned fitted or fixed covers, particularly in areas exposed to stormy or gale force weather, and about the potential for unnecessary expense if alternative solutions are not permitted. Several respondents called for a wider range of approved cover types, supported by evidence of their effectiveness, and for cost-benefit analysis to ensure resources are directed to the most beneficial measures.

False and Misleading Information

In the consultation (Question 26) the Department asked respondents about extending the liability for the provision of false and misleading information from the controller to the appropriate person.

Question 26: Do you agree that the existing provisions around providing false and misleading information should extend to the appropriate person?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1392 responses to this question, with 217 responding to the second part of the question.

Table 60 Citizen Space responses to Question 26

Option	Total	Percent
Strongly Agree	104	7.05%
Agree	308	20.87%
Neutral	521	35.30%
Disagree	198	13.41%
Strongly Disagree	261	17.68%
Not Answered	84	5.69%

Several key concerns emerged from the feedback, reflecting a desire for greater clarity and careful consideration in any policy changes. Many respondents expressed uncertainty about what exactly the 'existing provisions' refer to and who is considered an 'appropriate person' for instance, whether this includes consultants, contractors, co-ops advisers or software providers. There were repeated calls to clearly define the thresholds between 'false' and 'misleading' information, to distinguish between intentional wrong-doing and innocent mistakes, and to clarify what qualifies as sufficient evidence. A significant number emphasised that complex record keeping often leads to honest errors and asked for a

proportionate approach. They called for education or warnings before imposing sanctions in cases where there is no clear intent to deceive.

Some respondents worried that expanding liability might discourage advisers and consultants from assisting farm businesses with their nutrient management accounts, fearing the risk of being held responsible for mistakes, which could ultimately limit farmer's access to expert support. Others were concerned about increasing bureaucratic burdens, a punitive tone and the potential for over-enforcement, which they felt might hinder efforts to comply rather than encourage them.

Additional comments stressed the need for ongoing engagement with sector organisations and called for more transparent policy rationales and impact assessments. There were also requests for improved guidance, training and system design such as clearer forms and validation prompts to help prevent errors from occurring in the first place.

Several respondents sought a stronger evidence base to justify why extending this provision is both necessary and appropriate.

Alternative suggestions included clearer definitions, more education and support rather than punitive measures, and a focus on persistent offenders rather than blanket enforcement.

Written Responses

Table 61 Written responses to Question 26

Individuals, Organisations and Key Representatives – Responded 60	Total	Percent
Agree	13	22%
Neutral	3	5%
Disagree	44	73%
Total	60	100%

The primary concern among respondents was the need for proportionality and clear intent when extending liability to third parties such as advisers and agents. Similar to the responses received via Citizen Space, many of the respondents were concerned that broadening liability could unfairly penalise honest mistakes made in complex and ever

changing regulatory environments. Stakeholders suggested that any policy changes should limit liability to intentional or reckless actions.

Respondents also queried the scope and definitions of the proposed changes. An example is the use of vague language around the 'appropriate person' could inadvertently include groups such as students, administrative staff, contractors, hauliers, or junior employees, individuals who may not have actual control over the information in question.

Another significant theme was the potential impact on advisory capacity. There was concern that the threat of liability could deter consultants and advisors from helping farm businesses, which could reduce much needed support at a time when record-keeping and nutrient accounting are becoming increasingly complex. Many respondents advocated for maintaining primary responsibility with the main controller and if liability must be extended, they recommended including due diligence defences, implementing a graduated response system (education, civil sanctions and finally prosecution for deliberate violations). Some respondents felt that there are already existing remedies in respect of this proposal, existing regulations already trigger penalties for controllers (farmer), and potential professional indemnity or reputational consequences for agents. Therefore, creating parallel liability on an appropriate person is unnecessary and unhelpful.

Some respondents question whether there is sufficient evidence to justify expanding liability to third parties, asking for the publication of statistics on false or misleading submissions, enforcement outcomes under current laws and a clear policy rationale that links any changes to tangible improvements, such as better compliance rates or water quality outcomes.

Those respondents supporting the proposals, especially among environmental sector, saw this as a way to close loopholes, enhance public confidence, and ensure that all materially involved parties can be held accountable. However, they stressed the importance of clear rules, fair penalties, an open appeals process and enough inspectors to make sure only those who deliberately break the rules are punished.

Suggestions for alternatives to this proposal from across the different respondents included precisely defining roles and boundaries (such as distinguishing between consultants, software vendors etc), embedding a threshold of intent or recklessness for third party liability,

publishing penalty matrixes and annual enforcement statistics to improve transparency, and investing in practical enablement resources like templates, checklists and training to make compliance achievable for both farm businesses and advisors.

Technical Amendments

The Department provided a list of technical amendments proposed as part of the review of the Nutrient Action Programme Regulations (NI) 2019.

Question 27: Do you agree with the amendments listed, that these are technical amendments, which either provides clarification or corrects errors in the regulations?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1367 responses to this question with 170 responding to the second part of the question.

Table 62 Citizen Space responses to Question 27

Option	Total	Percent
Strongly Agree	31	2.10%
Agree	129	8.74%
Neutral	586	39.70%
Disagree	281	19.04%
Strongly Disagree	340	23.04%
Not Answered	109	7.38%

Respondents who provided reasons for disagreeing with the technical amendments raised concerns about the lack of transparency, clarity, and consultation. A representative organisation noted that the following regarding the technical amendments:

“Most of the listed amendments seem logical to correct ...typos and provide consistency of language...there is one ... copied...more clarification on as it is quite vague in terms of what it means in practice:

...that as part of the controls on NAP that there is a requirement to notify the Department of movement all organic manures on and off a farm. This amendment will extend the definition of an appropriate person to beyond those who have custody or control of livestock manures.”

Many provided conditional agreement so long as the amendments were just corrections or clarifications and did not introduce substantive policy changes without proper justification or stakeholder engagement.

Written Responses

Those responding in writing generally didn't respond directly to this question, a majority of respondents raised concerns over the consultation process in general and lacking transparency in the process. Their responses concentrated on other substantive policy objections and changes.

Individuals, Organisations and Key Representatives – Responded 13	Total	Percent
Agree	11	85%
Neutral	2	15%
Disagree	0	0%
Total	13	100%

Those responding generally agreed or supported the technical amendments as necessary clarifications or corrections. For example, some representative organisations welcomed the clarification relating to lagoons so that the regulations reflect the existing guidance.

Although there was general agreement from those who directly responded to this proposal, a majority agreed with the representative organisation who responded through citizen space, that they would like clarification relating to the extension of the term “appropriate person” in relation to organic manure movements.

It was highlighted by Industry Representatives responding that regulation numbers were misquoted and would need to be corrected before they were implemented.

Updated Procedure and IT System for recording slurry / manure exports and imports

The consultation put forward proposals relating to updated online IT recording systems for recording slurry and manure exports and imports, these relevant questions are 28 and 29.

Question 28: Do you agree with the introduction of a system that requires all slurry / manure movements to be recorded within 4 days of the movement and verified by the receiving farm where it will be land spread?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1445 responses to this question with 645 responding to the second part of the question.

Table 63 Citizen Space responses to Question 28

Option	Total	Percent
Strongly Agree	58	3.93%
Agree	79	5.35%
Neutral	139	9.42%
Disagree	344	23.31%
Strongly Disagree	825	55.89%
Not Answered	31	2.10%

Respondents overwhelmingly disagreed with this proposal. The main reasons cited included the impracticality of the timeframe during busy farming periods, especially when weather conditions dictate urgent spreading; the administrative burden on small and family-run farms; and the risk of non-compliance due to delays in verification or contractor confusion. Many felt

the system would discourage nutrient sharing, increase stress and mental health issues, and penalise responsible farmers while failing to deter persistent offenders. Concerns were also raised about digital literacy, rural broadband access, and the lack of consultation and scientific evidence.

Alternative proposals included extending the reporting window to 14 or 28 days, aligning with existing nutrient management timelines, simplifying the process, offering offline options, and focusing on education, support, and targeted enforcement rather than blanket regulation.

Written Responses

Table 64 Written responses to Question 28

Individuals, Organisations and Key Representatives – Responded 51	Total	Percent
Agree	9	18%
Neutral	3	6%
Disagree	39	76%
Total	51	100%

General agreement was expressed by a minority of respondents, primarily from an environmental or regulatory background. They highlighted the importance of improved traceability, accountability and enhanced environmental protection. Supporters also emphasised the need for a robust system to meet international compliance and called for the inclusion of all nutrient- loading materials and effective cross-border monitoring.

Conversely, the majority of respondents, particularly those representing farming interests, disagreed with the proposal. They criticised it as overly bureaucratic and impractical, raising concerns about the short four-day reporting window, increased administrative burden, and potential digital exclusion in rural areas. Many feared that the measure could discourage cooperation between farms and lead to a greater reliance on synthetic fertilisers if organic nutrient redistribution becomes more difficult.

Key themes across the responses included support for environmental accountability and pollution reduction, as well as significant worries about excessive regulation, operational impracticalities and unintended negative consequences for sustainable farming practices.

Alternative suggestions included retaining or enhancing the current annual reporting system, extending the reporting window, offer non-digital compliance options, and tailoring requirements for specific sectors. There was a consensus among neutral and mixed responses on the value of co- developing any new system with industry stakeholders to ensure it is workable and proportionate.

Question 29: Subject to appropriate legislative powers being available, do you agree that the system should be extended to include movements of processed/separated slurry solids from farms and digestate to farms?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1416 responses to this question with 254 responding to the second part of the question.

Table 65 Citizen Space responses to Question 29

Option	Total	Percent
Strongly Agree	65	4.40%
Agree	172	11.65%
Neutral	274	18.56%
Disagree	287	19.44%
Strongly Disagree	618	41.87%
Not Answered	60	4.07%

Respondents who disagreed with the proposal to extend the system to include movements of processed/separated slurry solids and digestate to farms expressed concerns about excessive bureaucracy, impractical reporting timelines, and disproportionate burdens on small and family-run farms. Many felt that the proposal lacked clarity, scientific justification, and failed to recognise existing good practices and nutrient management plans. There was widespread fear that the added complexity would discourage beneficial innovations like

anaerobic digestion and nutrient recycling, and penalise responsible farmers without delivering meaningful environmental benefits.

Alternative suggestions included longer reporting windows, offline options for record-keeping, incentive-based schemes, targeted enforcement in high-risk areas, and greater support for education, infrastructure, and farmer-led solutions. Respondents also urged DAERA to revisit the Regulatory Impact Assessment and involve real farmers in scenario testing to ensure practicality and fairness.

Written Response

Table 66 Written Responses to Question 29

Individuals, Organisations and Key Representatives – Responded 11	Total	Percent
Agree	5	46%
Neutral	2	18%
Disagree	4	36%
Total	11	100%

Supporters advocated for the inclusion of processed or separated slurry solids and digestate within nutrient management systems, viewing this as vital for comprehensive nutrient oversight and environmental protection. There were further recommendations to expand the system's remit to encompass additional nutrient-bearing materials, such as sewage sludge, mulches, composts and biochar. Proponents emphasised the importance of traceability and accountability, arguing that tracking all organic residues contributing to nutrient loading is necessary for ensuring transparency and regulatory compliance.

On the other hand, those disagreeing expressed concerns that broadening the systems scope could lead to increased bureaucracy and costs, placing extra administrative burdens on farmers and businesses already committed to nutrient recycling. They warned that excessive regulation may disincentivise the beneficial use of processed manures and digestate, which support circular nutrient economies and reduce dependency on chemical fertilisers. Some pointed out that these materials are already thoroughly documented through existing plant records, nutrient management plans or assurance schemes suggested that further reporting could be redundant.

Alternative proposals included extending the system to all nutrient bearing materials, engaging stakeholders in its development to ensure proportionality and feasibility focusing on practical guidance and robust nutrient testing and avoiding duplication of existing documentation. There was a consensus on the need for clarity and simplicity to facilitate participation without imposing unnecessary administrative complexity.

Early Warning Information System

In the consultation the Department proposed the introduction of an early warning information system, based on heavy rain forecasts, to identify periods where slurry cannot be spread on land. Questions 30 and 31, asked respondents if this type of system would be beneficial.

Question 30: Do you agree that this type of system would be beneficial?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1420 responses to this question with 348 responding to the second part of the question.

Table 67 Citizen Space responses to Question 30

Option	Total	Percent
Strongly Agree	86	5.83%
Agree	202	13.69%
Neutral	291	19.72%
Disagree	298	20.19%
Strongly Disagree	543	36.79%
Not Answered	56	3.79%

The responses included a diverse range of opinions regarding the introduction of the proposed early warning system for slurry spreading. The majority of those responding were sceptical and opposed to the regulating of such a system. Throughout the responses there were several reoccurring concerns.

Many respondents emphasised that weather and ground conditions in Northern Ireland can vary dramatically even within short distances, making such a system impractical. Farmers said that they are best placed to judge suitable spreading times, given their intimate knowledge of their own land and local conditions. The responses were strongly of the view that farmers already had the necessary expertise and tools (including weather apps) to make an informed decision about slurry spreading. That this proposal undermined the farmer's practical experience, that the Department should respect the farmer's judgement.

There was widespread doubt about the reliability of weather forecasts, with many commenting that forecasts are often inaccurate or too general. Concerns raised as a result of this were that this could lead to unfair restrictions or penalties for farmers who act responsibly.

While there were some who acknowledged the potential environmental benefits such as reducing nutrient run off into waterbodies, most said that the existing regulations already sufficiently address these concerns. It was suggested that education and better enforcement of the existing regulations would be more effective than introducing new systems.

Support for any such system was conditional on it being used as an advisory tool rather than a regulatory and mandatory provision. It was recommended to trial the system with mobile friendly platforms and clear guidance to ensure practical use without replacing the farmer's judgement.

Written Responses

Table 68 Written Responses to Question 30

Individuals, Organisations and Key Representatives – Responded 15	Total	Percent
Agree	7	47%
Neutral	2	13%
Disagree	6	40%
Total	15	100%

Supporters of the proposed early warning system for slurry spreading highlighted several key advantages. They believed that such a system would contribute significantly to environmental protection by reducing phosphorus runoff and safeguarding watercourses particularly by preventing slurry application during unsuitable conditions. Further they pointed to economic benefits noting that avoiding slurry spreading before heavy rainfall can prevent the wastage of nutrients and labour thereby saving farmers money. Those that advocated for the proposal also said that the system would enable more informed decision making and improving compliance with regulations and environmental outcomes. Additionally, some viewed the system as a valuable supplement rather than a replacement for the closed period of slurry spreading.

Conversely those opposed to the system raised concerns about increased bureaucracy and complexity suggesting it may introduce unnecessary administrative burdens and potentially date cooperation or timely nutrient application. There are also expressed doubts regarding the accuracy and local relevance of weather warnings with fears that broad or unreliable alerts could cause confusion or result in unfair penalties. Some opponents felt that farmers already exercise sound judgement using their local knowledge to avoid spreading in adverse conditions rendering the system redundant. Others were concerned about unintended consequences such as operational uncertainty for those employing contractors and the system's inability to account for localised weather variations.

Alternative suggestions included integrating local weather data to enhance the accuracy and relevance of warnings, piloting the system before mandatory rollout to identify and resolve practical issues and providing comprehensive guidance and education on both environmental and economic risks as well as transparent enforcement protocols.

Question 31: What are your views on the helpfulness of a system like this?

What are your views?

Citizen Space

There were 1423, responses to this question with 862 responding to the second part of the question.

Option	Total	Percent
Strongly Agree	51	3.46%
Agree	186	12.64%
Neutral	295	20.04%
Disagree	331	22.49%
Strongly Disagree	560	38.04%
Not Answered	49	3.33%

The majority of farmer and agricultural representatives expressed strong opposition to the proposed system. Similar to the previous question, it was felt that such a system would add unnecessary bureaucracy, increase administrative burdens and fail to take into account localised weather conditions. In addition, concerns were also raised about the practicality of enforcing a centralised system, especially given how quickly conditions and weather predictions can change and the diversity of farm types and locations.

These concerns raised issues around how workable such a system would be at ground level and apprehension that penalties could be imposed on farmers for spreading slurry in appropriate conditions simply because a forecasted event did not materialise as predicted.

Similar to responses to the previous question, concerns around the impact of added complexities, could deter compliance, increase stress and distract from core farming activities. Some questioned the value for money, suggesting that resources would better focusing on education, support or targeted enforcement rather than a blanket regulatory change.

Responses from environmental sector reflected views expressed to question 30, that they were supportive of such a system to protect water from nutrient run off. However, they stress that such a system needs to be accurate, locally relevant and used as a guidance tool rather than an enforcement mechanism.

There were strong views that any such a system should not override a farmer's practical experience and common sense. Alternative suggestions included more general recommendations regarding online systems around extending reporting windows and offering off line alternatives. In relation to the spreading of slurry and any such notification system there was a call for a more flexible approach, such as allowing slurry spreading based on actual weather and ground conditions, rather than fixed calendar dates. If such a system was to be designed, this should be done in conjunction with farmers including the testing of such a system to ensure that it reflects real-world challenges and is accessible for all.

Written Responses

Table 69 Written responses to Question 31

Individuals, Organisations and Key Representatives – Responded 13	Total	Percent
Agree	6	46%
Neutral	2	15%
Disagree	5	39%
Total	13	100%

Supporters regarded the system as a valuable decision support tool offering timely guidance on appropriate conditions for slurry spreading. The possibility of integrating localised weather data and digital tools was also seen as an opportunity to enhance the systems effectiveness. Additionally, some suggested that enabling public reporting of non-compliance could promote greater transparency and accountability.

On the other hand, those disagreeing said that the system may offer limited added value as they believed farmers already avoid unsuitable spreading conditions and that stronger enforcement of current rules and improved education would be more beneficial. Concerns were also raised about the accuracy and local relevance of weather forecasts which could lead to uncertainty and diminish the systems usefulness. Some respondents felt that the

system introduces unnecessary bureaucracy and complexity questioning its fairness and reliability. There was also a preference among several for relying on farmers own expertise and judgement over centralised digital warnings.

Alternative solutions suggested included incorporating region specific weather data and soil monitoring to improve accuracy establishing public reporting mechanisms potentially via apps or online portals and conduction pilot tests ahead of full implementation. Clear guidance, educational initiatives on environmental and economic risks and transparent enforcement protocols are recommended. Importantly respondents stress the need to retain flexibility for farmers to exercise their own judgement in cases where local conditions differ from regional forecasts and to ensure that the system complements rather than replaces existing rules and closed periods.

Fertiliser Database

Questions 32 to 34 related to the proposed introduction of a fertiliser and feed database.

Question 32: Do you agree this database would help farmers manage their fertiliser records?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1427 responses to this question and 394 responding to the second part of the question.

Table 70 Citizen Space responses to Question 32

Option	Total	Percent
Strongly Agree	51	3.46%
Agree	187	12.67%
Neutral	296	20.05%
Disagree	332	22.49%
Strongly Disagree	561	38.01%
Not Answered	49	3.32%

The main reasons respondents disagreed with the proposal that a fertiliser database would help farmers manage their records centred on concerns about increased bureaucracy, duplication of existing practices, and lack of practical benefit. Many farmers already maintain fertiliser records tailored to their operations and viewed the proposed centralised system as burdensome, especially given the unrealistic 4-day reporting window and potential for errors. Respondents highlighted issues such as poor rural broadband, low digital literacy among older farmers, and the risk of increased costs passed on by merchants. There was also scepticism about the database's true purpose, with some believing it was more about government monitoring than farmer support.

Alternative proposals included advisory-based compliance, voluntary schemes, integration with existing tools, offline options, and targeted support for small and family-run farms. Respondents urged DAERA to prioritise education, flexibility, and practical assistance over rigid enforcement.

Written Responses

Table 71 Written responses to Question 32

Individuals, Organisations and Key Representatives – Responded 17	Total	Percent
Agree	4	23%
Neutral	2	12%
Disagree	11	65%
Total	17	100%

Respondents provided a range of perspectives regarding the implementation of a centralised fertiliser database. Supporters highlighted the potential for improved record keeping noting that integration with digital tools has the potential to make managing fertiliser data more efficient for farmers. They also acknowledged the database could aid regulatory compliance and offer clearer oversight of nutrient flows at the farm level. However, this support was often conditional with several respondents emphasising the importance of providing adequate support, training and non-digital alternatives given the varied digital skills and age profile within the farming community.

Conversely those with concerns around the proposal cited the risk of increased bureaucracy and administrative burden particularly for smaller farms and merchants. Many said that existing record keeping practices already fulfil regulatory and quality assurance needs rendering a new database redundant. Additional concerns were raised regarding the potential costs associated with the new IT systems, the risks of errors beyond farms control and scepticism about whether the database would deliver genuine improvements in water quality or nutrient management. Issues related to data privacy and the protection of business information were also mentioned.

Alternative proposals focused on inclusivity and practicality suggesting comprehensive training, ongoing support and options for a paper-based submissions. Financial assistance for merchants to cover IT upgrades and administrative costs was recommended alongside a strong emphasis on system simplicity and user-friendly guidance. Respondents advocated leveraging existing data systems ensuring the accuracy of nutrient information prior to implementation and engaging stakeholders throughout the design and rollout process to minimise disruption and better address industry needs.

Question 33: Do you agree that this would help reduce the unnecessary purchase and use of fertiliser?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1420 responses to this question and 428 responding to the second part of the question.

Table 72 Citizen Space responses to Question 33

Option	Total	Percent
Strongly Agree	49	3.32%
Agree	177	11.99%
Neutral	230	15.58%
Disagree	385	26.08%
Strongly Disagree	579	39.23%
Not Answered	56	3.79%

Respondents who disagreed with the proposal that a fertiliser database would help reduce unnecessary purchase and use of fertiliser expressed strong concerns about its practicality, effectiveness, and fairness. Many said that farmers already manage fertiliser use responsibly due to high costs and existing record-keeping practices, and that poor advice or unpredictable weather, not lack of tracking, were the real causes of inefficiency. The database was seen as an added layer of bureaucracy that would disproportionately burden

small and family-run farms, especially those with limited digital access or skills. There was also scepticism about the database's true purpose, with some viewing it as a government monitoring tool rather than a support mechanism.

Alternative proposals included improving education and advisory services, promoting nutrient management planning based on soil health, extending the Sustainable Catchment Programme, and ensuring any system is simple, voluntary, and integrated with existing farm tools.

Written Responses

Table 73 Written responses to Question 33

Individuals, Organisations and Key Representatives – Responded 16	Total	Percent
Agree	3	19%
Neutral	1	6%
Disagree	12	75%
Total	16	100%

A significant number of respondents expressed concerns primarily noting that the high cost of fertiliser already acts as a deterrent to excessive use. Many viewed the introduction of a database as an unnecessary bureaucratic layer that would increase administrative burden without offering substantial advantages. Additionally, there were reservations about the reliability of the database with some pointing out that its effectiveness is contingent on the accuracy and currency of underlying nutrient data.

In addition to raising the same concerns as those highlighted in the Citizen Space responses, they advocated for alternative approaches such as soil testing, enhanced knowledge transfer and comprehensive nutrient management planning as more effective ways to promote efficient fertiliser use. There was also recognition among some respondents that a database on its own is insufficient and should form part of a broader strategy that includes education and support for farmers.

Suggested solutions include focusing on soil health information and training, piloting the database before full scale implementation, updating and verifying all nutrient data providing mentoring to aid data interpretation and leveraging existing reporting systems to avoid unnecessary duplication and administrative workload.

Question 34: Do you agree that the database would help farmers achieve compliance with NAP measures?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1420 responses to this question and 315 responding to the second part of the question.

Table 74 Citizen Space responses to Question 34

Option	Total	Percent
Strongly Agree	46	3.12%
Agree	148	10.03%
Neutral	293	19.85%
Disagree	360	24.39%
Strongly Disagree	573	38.82%
Not Answered	56	3.79%

Respondents who disagreed with the proposal that a fertiliser database would help farmers achieve compliance with the NAP measures expressed concerns about its practicality, fairness, and effectiveness. Many felt the system would impose excessive bureaucracy, duplicate existing record-keeping practices, and fail to address the real challenges of nutrient management such as weather variability, soil differences, and infrastructure limitations. There was widespread scepticism that the database would genuinely support compliance, with some viewing it as a government monitoring tool rather than a helpful resource. Respondents highlighted the risk of penalising farmers for minor errors, especially those on small or family-run farms with limited digital access or administrative support.

Alternative proposals included expanding advisory services, integrating the database with existing farm tools, extending the Sustainable Catchment Programme, and prioritising education, flexibility, and targeted support over rigid enforcement.

Written Responses

Table 75 Written responses to Question 34

Individuals, Organisations and Key Representatives – Responded 16	Total	Percent
Agree	4	25%
Neutral	2	13%
Disagree	10	62%
Total	16	100%

Supporters of the proposed fertiliser database emphasised its potential to enhance monitoring and traceability within the sector. They contended that, if effectively integrated with nutrient management plans, the database could help ensure compliance by tracking fertiliser purchases and usage in relation to farm nutrient limits. Additionally, some believed that combining this resource with soil health data and mentoring initiatives could help optimise fertiliser application and avoid unnecessary use. The database is also viewed positively by those who feel it could benefit younger or more digitally engaged farmers, provided that adequate training and digital infrastructure are established.

Many of the written respondents who disagreed with this proposal cited the same reasons as those outlined in the Citizen Space responses. Further concerns included increased costs for merchants, potentially passed on to farmers, the need for costly IT systems, and the risk of errors beyond farmers' control. Several participants favoured alternative approaches such as improved soil testing, knowledge transfer, and more robust nutrient management planning.

Alternative proposals focused on providing comprehensive training and support, offering alternative submission methods such as paper records to ensure inclusivity, and supplying financial assistance to smaller merchants for IT upgrades and administrative expenses. Simplifying the system and providing clear, step-by-step guidance were also advised. Stakeholders suggested leveraging existing records and reporting systems to avoid

duplication of effort and emphasise the importance of reviewing and updating nutrient data before launching the database. Ongoing engagement with industry stakeholders throughout development and rollout was recommended in replies, to ensure practicality and minimise disruption.

Anaerobic Digestate

In the consultation the Department put forward a number of proposals relating to digestate separation, nutrient management planning to crop need and record keeping, questions 35 to 37 related to these proposals.

Question 35: Do you agree with the proposals requiring separation of digestate before it can be land spread?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1406 responses to this question with 292 responding to the second part of the question.

Table 76 Citizen Space responses to Question 35

Option	Total	Percent
Strongly Agree	54	3.66%
Agree	136	9.21%
Neutral	411	27.85%
Disagree	316	21.41%
Strongly Disagree	489	33.13%
Not Answered	70	4.74%

Over half of the respondents who replied to this question through citizen space disagreed or strongly disagreed with this proposal.

Those who supported the proposal gave environmental protection as the most common reason. They highlighted the importance of reducing phosphorus and nitrogen levels in soils and watercourses, arguing that separation would enable more targeted nutrient application and help reduce the risk of pollution. Some felt that by separating the digestate it would facilitate more precise nutrient management by allowing the phosphorus rich fraction to be moved away from areas at high risk of nutrient overload, while the nitrogen rich liquid fraction could be used where there was higher crop demand.

Others seen this approach as supporting the circular economy by promoting nutrient recycling and reducing the reliance on artificial fertilisers. There was also support for exporting separated solid nutrients to regions with lower nutrient levels or for further processing.

Respondents who opposed the digestate separation proposal primarily cited economic and practical concerns. Many felt the measure would impose additional costs on farm businesses already facing financial pressures, particularly for small and medium-sized farms. Many felt that these extra costs and complexities could threaten the viability of farming businesses, discourage the use of digestate, and even undermine broader circular economy goals.

On the other hand, some respondents expressed doubts as to whether or not separation would actually reduce nutrient losses, pointing out that both the solid and liquid fractions would still be applied to land, meaning the overall nutrient load might even remain unchanged. In addition, there were also fears that separating digestate could increase the risk of nutrient leaching, especially from the liquid fraction, which is more prone to run-off.

Another comment which was common was related to planning and regulatory hurdles, such as difficulties in obtaining permission to build new storage or install separation equipment, would make compliance challenging or impossible in many cases.

Some respondents felt there was not enough evidence to prove the effectiveness of mandatory separation in reducing pollution and called for more research before any such rule was imposed.

There were concerns expressed that the separated slurry returned to farms will be different and that it could contain microplastics, and that the make-up of it would be different to what soils on the farm are used to.

Suggested alternatives included making separation optional, improving nutrient management locally, and avoiding blanket mandates that increase operational burdens without clear benefits. As part of the optional suggestion, there was mention of incentives to carry out the separation, and requests for financial support for small farms that might need to adopt separation. There were also calls for more education and guidance on safe and effective digestate management.

There was also a suggestion that there should be maximum limits imposed on the spreading of digestate of 10t/ha/year solid portion and 20t/ha/year liquid portion.

Written Responses

Table 77 Written Responses to Question 35

Individuals, Organisations and Key Representatives – Responded 20	Total	Percent
Agree	7	35%
Neutral	3	15%
Disagree	10	50%
Total	20	100%

Among those who responded in support of the proposal, it was often conditional. Stakeholders supported the principle of separation but emphasised the need for consultation with anaerobic digestate (AD) operators, adequate support and incentives for farm businesses. There were also requests for policy mechanisms that link slurry separation with border environmental and economic goals.

Some respondents from the environmental and recreational sectors highlighted the risk of unintended consequences, such as increased ammonia emissions potentially undermining water quality improvements and the possibility that separation could simply redistribute nutrients rather than reduce them. There were also some concerns raised that existing

separation technologies may not sufficiently remove phosphorus or could inadvertently increase nitrogen in waterways.

Many stakeholders, particularly from the farming and agri-food sectors, expressed strong reservations about the cost and complexity of implementing mandatory separation and the financial and administrative burden for small and medium-sized farms. Planning and regulatory barriers were also cited as significant obstacles, with several respondents saying that current rules make it impossible for most AD plants or farm businesses to install the necessary equipment.

Many stakeholders advocated for targeted nutrient management plans, robust farm-specific nutrient analysis and regionally tailored solutions rather than a blanket requirement for separation. There was support for separation as a potential solution for land at risk of phosphorus excess, but that it may not be the case in all areas. Some respondents showed support for pilot schemes or phased implementation to test effectiveness before a wider rollout.

Question 36: Do you agree that where digestate does not meet the reduced N:P ratio or where it has been produced using feedstocks from outside Northern Ireland regardless of its N:P ratio, that a nutrient management plan is required and it must be applied to crop need?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1392 responses to this question and 145 responding to the second part of the question.

Table 78 Citizen Space responses to Question 36

Option	Total	Percent
Strongly Agree	81	5.49%
Agree	240	16.26%
Neutral	438	29.67%
Disagree	228	15.45%
Strongly Disagree	405	27.44%
Not Answered	84	5.69%

Respondents in support of the proposal requiring a nutrient management plan for digestate not meeting the reduced N:P ratio or produced using feedstocks from outside Northern Ireland emphasised the importance of protecting the environment and ensuring that digestate is used responsibly. The requirement for a nutrient management plan would help guarantee that digestate is applied according to the specific needs of crops thereby minimising the risk of phosphorus runoff into water courses and helping to meet broader environmental targets.

Some responses referred to research and previous regulatory experience to highlight that, even when manures are treated, they can still contribute to diffuse pollution if not managed with care. There was a widespread view that the diverse and unpredictable composition of digestate, particularly when feedstocks are sourced from outside Northern Ireland, warrants a cautious and measured approach. In the responses it was stated that Northern Ireland

already has an adequate supply of digestate and that importing additional quantities could be both unnecessary and potentially damaging.

In addition, several respondents pointed out that many responsible farm businesses already make fertiliser decisions, including the use of digestate, based on soil testing and the actual requirements of their crops. For these individuals, the proposal was seen as a sensible development of existing good practice, building on methods that are already widely adopted and understood within the farming community.

Respondents who disagreed with the proposal said that digestate should be assessed based on its actual nutrient content and crop need rather than its origin or arbitrary N:P thresholds. It was pointed out that other organic fertilisers, such as manure and slurry, also display variable N:P ratios but are not subject to similar restrictions. Some respondents felt that the proposal unfairly targeted well-managed AD plants and responsible users, without addressing other significant sources of nutrient pollution, such as sewage discharges.

Many responses raised concerns over increased bureaucracy, duplication of existing nutrient planning efforts, and disproportionate impacts on small farms. It was felt that farm businesses were already subject to a substantial number of regulatory requirements and adding another layer could further complicate their operations without delivering clear advantages. Several individuals described the proposals as unnecessary 'red tape' or simply 'another paperwork exercise', suggesting it might discourage the use of digestate, a sustainable alternative to chemical fertiliser, by making its management cumbersome.

Those remaining neutral appeared to support the proposal in principle, and were supportive of the use of nutrient management plans, especially for digestate. However, some felt that this was already a requirement within the regulations, while others sought clarity regarding cross border implications and that the proposal could lead to the nutrient management plans becoming overly burdensome and complex.

Alternatives put forward included the integration of nutrient management into existing farm nutrient planning frameworks, with a focus on nutrient loading and water quality impact rather than blanket rules. Some called for basic nutrient testing of digestate and management to be

carried out through the farms' existing nutrient management plans rather than a separate or more intensive plan for certain types of digestate.

Written Responses

Table 79 Written responses to Question 36

Individuals, Organisations and Key Representatives – Responded 23	Total	Percent
Agree	12	52%
Neutral	0	0%
Disagree	11	48%
Total	23	100%

Across both individuals and key stakeholders' responses only a minority directly addressed the proposal regarding digestate and nutrient management plans. Most responses focused on broader NAP issues or related nutrient management concerns.

Support for the requirement of nutrient management planning was particularly strong among environmental organisations and certain local authorities. These stakeholders regarded the proposal as essential for achieving conservation objectives, safeguarding water quality and ensuring compliance other regulatory obligations. They advocated for rigorous monitoring, robust enforcement and meticulous record keeping upholding these goals.

On the other hand, representatives from the farming and agri-food sectors expressed considerable reservations about the practicality and economic implications of the proposals. They raised concerns on the feasibility of implementing mandatory nutrient management planning and the additional administrative burden on farm businesses.

They also raised concerns about policy coherence and regulatory duplication. They said that existing frameworks such as the Waste Management Licensing System and the Waste Framework Directive, already provide adequate control and monitoring of waste. As such they opposed the introduction of overlapping systems and urged policymakers to concentrate on feedstocks derived from waste, while avoiding technology mandates that are overly prescriptive.

Question 37: Do you agree with the proposals for record keeping for AD plants on the movement of organic manures received and the solids moved from the plants?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1395 responses to this question and 128 responding to the second part of the question.

Table 80 Citizen Space responses to Question 37

Option	Total	Percent
Strongly Agree	128	8.67%
Agree	282	19.11%
Neutral	436	29.54%
Disagree	213	14.43%
Strongly Disagree	336	22.76%
Not Answered	81	5.49%

Respondents who were in support of the proposed record keeping requirements for AD plants stressed that thorough documentation is vital for safeguarding the environment. In particular, they highlighted the importance of tracking nutrient flows and preventing pollution, arguing that accurate records would not only help ensure compliance with regulations but also aid enforcement and protect water quality. Transparency and traceability in the movement of organic manures were seen as essential tools for preventing nutrient build up especially for sensitive catchments and minimising the risk of runoff into watercourses. Respondents from environmental sector as well as some farmers felt that this proposal would support broader policy objectives such as improved nutrient management, advancing the circular economy and promoting the responsible expansion of AD technology.

In addition, many respondents pointed out that record keeping is already commonplace in other sectors and extending such practices to AD Plants would help ensure fair competition

across the industry. Since farmers are already obliged to keep records for other activities, it was considered reasonable to expect similar standards from AD Operators.

While there was broad agreement on the principle of record keeping, several respondents underlined the need for regulations to be proportionate and practical. They suggested that requirements should reflect the scale of the operation, with lighter regulation for small, on-farm AD units and stricter standards for larger, commercial plants. To help operators comply without undue administrative burden, many called for the provision of simple, user-friendly digital tools or templates.

Respondents expressed strong disagreement with the proposals for record keeping at AD plants concerning the movement of organic manures and solids. The main concerns centred on the excessive administrative burden, especially for small and medium sized farm businesses. Many respondents said that both farmers and AD operators already face a substantial regulatory load, and that additional documentation would draw time and resources away from their core activities. The term 'red tape' was frequently mentioned, with some describing the proposals as over-complicated or duplicative, particularly where similar records are already required under existing regulations.

Alternative proposals put forward included that new requirements could be integrated with existing systems, such as nutrient management plans, or waste management licencing returns, in order to avoid duplication.

Respondents also called for better support, training, and stakeholder engagement to ensure practical and effective implementation.

Written Responses

Table 81 Written responses to Question 37

Individuals, Organisations and Key Representatives – Responded approximately 35+	Total
Agree	9
Neutral	6
Disagree	19+

When analysing the written responses to this question there were 15+ individuals who indicated an explicit or implied opposition, along with 4 organisations or representative groups.

Those responding directly to this question expressed a range of views and priorities. Environmental and conservation organisations strongly supported comprehensive record keeping, emphasising its importance for effective nutrient management, environmental protection, transparency and verification, particularly in relation to cross border activities. Some advocated for extending these requirements to all sources of nutrients, not just those originating from AD Plants.

Those in support highlighted, that if records are to be kept, the recording system needs to be practical and accessible, including options for those without reliable internet access and encouraged the use of existing record keeping platforms to avoid unnecessary duplication.

In contrast agricultural producers and individuals expressed significant concerns about increased bureaucracy, the impracticality of new administrative burdens and the disproportionate impact on small and part-time farm businesses. Many expressed a concern that the additional requirements could hinder co-operation among farm businesses and create obstacles in nutrient sharing.

Common among those responding to this question, as with other similar questions in the consultation, was the view that the current waste regulations including the Waste Management Licensing provisions, are already there and that this proposal seemed to be a parallel or duplication of existing requirements.

Focused Approach

The consultation put forward a proposal for a focused approach for high risk areas and sensitive sites, the question relating to this proposal was question 38 in the consultation document.

Question 38: Do you agree that applying additional focused measures is an appropriate way to improve water quality in areas where it is most needed, rather than applying these additional measures to every farm?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1419 responses to this question and 356 responded to the second part of the question.

Table 82 Citizen Space responses to Question 38

Option	Total	Percent
Strongly Agree	190	12.87%
Agree	436	29.54%
Neutral	273	18.50%
Disagree	167	11.31%
Strongly Disagree	353	23.92%
Not Answered	57	3.86%

Respondents who disagreed with the proposal to apply additional focused measures only in areas most needed to improve water quality raised concerns about fairness, transparency, and unintended consequences. Many felt the designation of “high-risk” areas lacked clear criteria and risked penalising well-managed farms simply due to location. There were fears that such designation could become permanent, creating inequality and regulatory burden without guaranteed support. Respondents also criticised the lack of evidence for the environmental benefits and the disproportionate impact on small farms and rural economies.

Alternatives suggested included catchment-based voluntary approaches, advisory-led support, financial incentives, and broader stakeholder engagement. Many advocated for a balanced, evidence-based strategy that includes other polluters like NI Water and urban sources, rather than focusing solely on agriculture.

Written Responses

Table 83 Written responses to Question 38

Individuals, Organisations and Key Representatives – Responded 25	Total	Percent
Agree	9	36%
Neutral	3	12%
Disagree	13	52%
Total	25	100%

Some respondents agreed that focusing additional interventions on high-risk or sensitive areas is a more effective and proportionate approach than imposing such measures uniformly across all farms. Supporters of this approach said that it enables resources and actions to be directed where they will have the greatest environmental benefit. Evidence from previous catchment-based schemes was cited to demonstrate the effectiveness of spatially targeted actions, and several respondents highlighted the importance of using scientific evidence, such as soil nutrient risk maps, to identify priority areas. There was also support for integrating nature-based solutions, including floodplain meadow restoration, and for ensuring that farmers in these areas receive robust advice, tailored support, and adequate funding to implement the required measures.

However, many respondents who agreed with the principle of focused measures expressed significant reservations about the proposed implementation. Common concerns included a lack of detail on how high-risk areas would be identified, the criteria for selecting sites, the timescales for improvement, and the mechanisms for monitoring and enforcement. There was apprehension about the potential for mandatory regulatory measures and the threat of curtailing farming activity if improvements are not achieved within set timeframes. Respondents stressed that water quality improvements can take many years to materialise

and are influenced by factors beyond agriculture, such as climate and non-agricultural pollution sources.

Many opposed the proposal as set out in the consultation. The main reasons for opposition included concerns about fairness, transparency, and the potential for negative economic and social impacts on farmers in designated areas. Some respondents said that the approach risks creating regional inequalities, devaluing land, and undermining the viability of farming communities. Others felt that the proposal unfairly singles out agriculture, when water quality issues are caused by a range of sources, including domestic sewage, industrial discharges, and outdated wastewater infrastructure.

Several alternative approaches were suggested. Many respondents advocated for the expansion of voluntary, advisory-based catchment programmes, such as the Sustainable Catchment Programme and similar initiatives, which have demonstrated success in improving water quality. There was also support for non-regulatory measures, including knowledge transfer, advisory farm visits, financial support for implementing buffer zones and pollution prevention measures, and the use of nature-based solutions. Some respondents called for a whole-of-society approach to water quality, with all sources of pollution being addressed, not just agriculture. Others emphasised the need for meaningful stakeholder engagement, clear technical guidance, and adequate resourcing to ensure the success and fairness of any targeted measures.

Enforcement and Sanctions

Questions 39 to 41 related to proposals around enforcement and sanctions as part of the revised action programme.

Question 39: Do you agree that inspections should focus on key areas of non-compliance and in areas of poor water quality?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1428 responses to this question and 318 responding to the second part of the question.

Table 84 Citizen Space responses to Question 39

Option	Total	Percent
Strongly Agree	151	10.23%
Agree	427	28.93%
Neutral	325	22.02%
Disagree	198	13.41%
Strongly Disagree	327	22.15%
Not Answered	48	3.25%

Respondents who disagreed with the proposal to focus inspections on key areas of non-compliance and poor water quality expressed concerns about fairness, transparency, and the disproportionate impact on compliant farms located in designated high-risk zones. Many felt that such an approach risked penalising responsible farmers simply due to geography, while ignoring other contributors to pollution such as NI Water, urban runoff, and domestic sources. There was widespread anxiety about increased stress, financial burden, and mental health impacts, especially for small and family-run farms. Respondents criticised the lack of clarity around how high-risk areas would be defined and the cumulative burden of inspections on farm.

Alternatives suggested included a balanced inspection strategy combining targeted and rotational visits, prioritising education and advisory support over enforcement, catchment-based collaboration, and ensuring inspections are constructive, evidence-based, and part of a wider system that includes support, infrastructure investment, and accountability for all polluters.

Written Responses

Table 85 Written Responses to Question 39

Individuals, Organisations and Key Representatives – Responded 26	Total	Percent
Agree	10	38%
Neutral	3	12%
Disagree	13	50%
Total	26	100%

A variety of perspectives were expressed in response to the proposal that inspections should be targeted at key areas of non-compliance and regions with poor water quality. Some respondents agreed with the principle of focusing inspections where they are likely to have the greatest environmental benefit. Supporters of this approach said that prioritising high-risk areas and significant breaches would make the most effective use of limited resources and could help address the most pressing threats to water quality. There was also support for using transparent, evidence-based criteria to guide inspections, and for ensuring that the process remains fair for farmers. Some respondents emphasised the importance of coupling inspections with advice and education, so that farmers are supported in understanding and meeting requirements, rather than facing solely punitive measures.

However, others expressed reservations or outright opposition to the proposal as currently set out. Several respondents said that the overall number of inspections should be increased, not just targeted, in order to improve compliance with both existing and new measures. There was concern that the current inspection regime is insufficient to act as a deterrent, and that a more robust and visible enforcement presence is required. Some respondents called for inspections to be extended beyond agriculture, to include all significant sources of pollution, such as industrial discharges and domestic wastewater, to ensure that all polluters are held accountable.

A recurring theme was the need for a more collaborative, advisory-led approach, rather than one focused primarily on enforcement and sanctions. Many respondents felt that education, incentivisation, and proactive engagement with farmers would be more effective in achieving long-term improvements in water quality. Examples were given of successful partnership schemes, such as the Sustainable Catchment Programme, which have supported farmers in adopting best practices through advice and financial assistance. There was concern that an overemphasis on inspections and penalties could create anxiety, undermine trust, and discourage participation in voluntary schemes.

Some respondents also highlighted the administrative burden associated with multiple inspections, particularly for farms already subject to various assurance schemes and regulatory checks. There were calls for greater coordination between inspection regimes, and for recognition of compliance through participation in quality assurance or agri-environment schemes.

A number of alternative proposals were put forward. These included increasing the overall number of inspections, expanding the scope to cover all pollution sources, adopting a more flexible system that allows farmers to rectify minor breaches before penalties are applied, and investing in new technologies to improve the efficiency and targeting of inspections. There was also support for the creation of an independent Environmental Ombudsman's Office, and for strengthening enforcement powers to include cost recovery and civil actions for habitat restoration.

Question 40: Do you agree that the number of inspections should be increased in these areas?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1423 responses to this question and 287 responded to the second part of the question.

Table 86 Citizen Space responses to Question 40

Option	Total	Percent
Strongly Agree	85	5.76%
Agree	199	13.48%
Neutral	390	26.42%
Disagree	309	20.93%
Strongly Disagree	440	29.81%
Not Answered	53	3.59%

Respondents who disagreed with the proposal to increase the number of inspections in key areas of non-compliance raised concerns about fairness, effectiveness, and unintended consequences. Many felt that increasing inspections would unfairly target compliant farmers in high-risk zones, create a punitive atmosphere, and increase stress and mental health issues, particularly for small and family-run farms. There was widespread criticism of the lack of transparency, poor scientific justification, and disproportionate burden on agriculture compared to other polluters like NI Water and urban sources. Respondents said that more inspections alone would not improve water quality unless paired with education, advisory support, and infrastructure investment.

Alternatives suggested included a partnership-based approach, risk-based inspections with clear criteria, voluntary improvement plans, catchment-level collaboration, and reserving penalties for persistent or serious breaches. Many called for a shift from enforcement to engagement, with better communication, training, and respect for the realities of farming.

Written Responses

Table 87 Written Responses to Question 40

Individuals, Organisations and Key Representatives – Responded 20	Total	Percent
Agree	5	25%
Neutral	3	15%
Disagree	12	60%
Total	20	100%

A range of views was expressed in response to the proposal to increase the number of inspections in certain areas. Many respondents opposed the idea, arguing that inspection programmes should be fair, proportionate, and commensurate with the risk of non-compliance. They expressed concern that increasing the number of inspections would add further complexity and stress for farmers, many of whom are already subject to multiple inspection regimes. Some suggested that earned recognition should be considered for those participating in independent quality assurance schemes, and that resources might be better allocated to education, guidance, and support rather than additional inspections.

A smaller group supported increasing the number of inspections, arguing that this would improve compliance with existing and additional measures, and that robust verification and transparent sanctions are necessary to ensure accountability and act as a deterrent to non-compliance. Some called for the use of new technologies to make inspections more efficient and better targeted, thereby reducing unnecessary administrative burdens.

Some respondents said that the focus should not be solely on agriculture, and that inspections should be extended to all sectors contributing to water quality issues, including domestic and industrial sources. They felt that a balanced and holistic approach is required to address all sources of pollution, ensuring that all polluters are held equally accountable.

Across the responses, there was a strong preference for a collaborative, advisory-led approach, with greater emphasis on education, guidance, and support for farmers. Many called for a flexible system that allows farmers to rectify minor breaches before penalties are applied, and for the adoption of earned recognition for those demonstrating compliance through participation in quality assurance or agri-environment schemes.

Question 41: Do you agree that fixed/variable monetary penalties should be introduced to help act as a deterrent against non-compliances?

If you disagree, please let us know why and if there is an alternative solution, if you could please provide the supporting evidence for the alternative solution via email at NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 1424 responses to this question with 396 responding to the second part of the question.

Table 88 Citizen Space responses to Question 41

Option	Total	Percent
Strongly Agree	105	7.11%
Agree	162	10.98%
Neutral	297	20.12%
Disagree	340	23.04%
Strongly Disagree	520	35.23%
Not Answered	52	3.52%

There was strong opposition to the proposal to introduce fixed or variable monetary penalties as a deterrent against non-compliance. The main reasons cited included the disproportionate impact on small and family-run farms, the risk of penalising genuine mistakes or administrative oversights, and the erosion of trust between farmers and regulators. Many felt that such penalties would create a punitive and divisive environment, discourage cooperation, and fail to address the root causes of non-compliance, which often stem from unclear guidance or practical challenges. Concerns were also raised about the lack of economic modelling, transparency, and scientific justification, as well as the potential for increased stress and mental health issues in rural communities.

Alternatives suggested included advisory-based compliance support, warning notices, voluntary improvement plans, and reserving penalties for persistent or serious breaches. Respondents advocated for a more balanced, risk-based, and educational approach that supports farmers in achieving compliance rather than punishing them.

Written responses

Table 89 Written Responses to Question 41

Individuals, Organisations and Key Representatives – Responded 25	Total	Percent
Agree	10	40%
Neutral	5	20%
Disagree	10	40%
Total	25	100%

Some respondents strongly agreed with the introduction of such penalties, arguing that they would act as an effective deterrent and should be scaled appropriately to reflect the costs of prevention and remediation. Supporters of this approach emphasised the importance of robust enforcement mechanisms, suggesting that penalties should be sufficiently substantial to encourage compliance and that the polluter pays principle should be applied. Some also called for the use of penalty funds to support sustainable practices and environmental restoration.

Others were neutral or offered conditional support, stating that penalties should be reserved for cases of deliberate or repeated non-compliance, and that genuine errors should be addressed through education and support rather than fines. There was a common view that penalties must be fair, transparent, and proportionate, with clear guidance on their application and an appeals process in place. Some respondents noted that further detail is required before they could fully support the proposal, particularly regarding how penalties would be implemented, the level of fines, and the interaction with existing compliance schemes.

Two thirds of respondents disagreed with the proposal citing similar views as those expressed on citizen space. They said that farmers are already subject to multiple layers of regulation and that additional penalties could lead to duplication and disproportionate punishment. Some felt that an advisory and education-first approach would be more effective in achieving compliance and improving water quality, with penalties used only as a last resort. Others highlighted the need for a holistic approach, ensuring that all sectors contributing to water quality issues are held equally accountable, not just agriculture.

Alternative proposals included the adoption of a system similar to improvement or prohibition notices, allowing for rapid corrective action before the imposition of fines, and the expansion of independent advisory support and education. Some respondents called for a full impact assessment and further consultation before introducing new penalty regimes, to ensure that the approach is proportionate, fair, and effective.

Impact Assessments

As part of the consultation package there were a number of impact assessments completed and questions 42 to 51 related to these assessments.

Equality Screening

Question 42: Are there any equality comments you wish to raise at this point?

Citizen Space

There were 563 responses received on Citizen Space to this question.

Those responding to this question expressed their frustrations, related to the consultation and proposed measures. This included the feeling that farmers were being disproportionately blamed for water pollution and related environmental issues. They said that other significant contributors such as water companies including sewage treatment plants are not held to the standards or scrutiny.

Common amongst the responses is that all polluters should be treated equally, with many demanding that water companies and other industries face the same level of regulation and enforcement and penalties as farmers. Instead of penalising the farmer as it is perceived that the farming industry is the easier target.

Other concerns raised in response to this question and frequently referred to throughout the consultation responses was lack of meaningful consultation and engagement with the farming community during the policy development process. Many felt that the consultation

was rushed, poorly communicated and inaccessible. The complexity and volume of documentation, combined with the limited time to review added to the stress and anxiety that is felt across the sector. Many respondents highlighted that the impact of the proposals on the rural community has not been reflected, especially for smaller family farms which are seen to be vulnerable to the financial and administrative burdens imposed by the proposals.

Written Responses

Table 90 Written responses to Question 42

Individuals, Organisations and Key Representatives – Responded 13	Total	Percent
Raised Equality Concerns	7	54%
No Equality Comments/No Concern	5	38%
Neutral/Unclear	1	8%
Total	13	100%

Of the thirteen respondents, just over 50% raised concerns about the equality implications of the proposed NAP measures. Several highlighted that the consultation process may not have met basic standards of fairness and transparency, with some suggesting that the rights of farmers under the European Convention on Human Rights, particularly the right to a fair process and respect for private and family life, could be infringed. There were calls for the consultation to be reconsidered, with requests for additional time, clearer information, and greater support to enable stakeholders to fully understand the proposals.

Some respondents said that the Section 75 screening and Rural Needs Impact Assessment conducted by DAERA were insufficient, noting that the conclusion of “no adverse impact” was not supported by the experiences of rural communities. They pointed out that the NAP could disproportionately affect older farmers and small family farms, particularly in rural areas, and that focusing solely on agriculture overlooks other significant sources of nutrient pollution. It was suggested that a more holistic approach is needed, one that addresses all major contributors to water quality issues, not just the agricultural sector.

There were also concerns that the Equality Impact Assessment (EQIA) did not fully consider the potential differential impacts of the proposed measures on various sectors and communities. Some responses highlighted that the phosphorus balance and buffer strip

proposals could have significant negative effects on the agri-food sector, with wider implications for rural communities, especially those more economically dependent on agriculture. The EQIA was also said to have overlooked the implications of requiring the pig sector to adopt certain measures earlier than other sectors, and the potential equality issues arising from the focused approach. Respondents recommended that a revised EQIA be undertaken as part of the next consultation phase, with a more detailed assessment of the potential impacts on different sectors, regions, and rural communities.

Young farmers' representatives expressed concern that the proposed changes could have disproportionate effects on younger farmers, who often have smaller holdings and less capital. They noted that many young farmers feel they lack adequate information and advice on agricultural policy, and that the complexity of the NAP proposals, combined with the timing of the consultation during a busy period, may prevent meaningful engagement from the farming community.

Question 43: Do you have any evidence that would be useful to the Department?

If so, can you describe the evidence and provide a copy to

NutrientsActionProgramme@daera-ni.gov.uk

Please describe the evidence

Citizen Space

There were 275 responses to this question through Citizen Space.

The main equality concerns raised by respondents focused on the disproportionate impact of proposed regulatory changes on rural and farming communities, particularly small and family-run farms. Many highlighted that these groups already face significant challenges such as poor broadband access, limited digital literacy, and financial constraints, which could be exacerbated by increased bureaucracy and compliance demands. Respondents also noted that older farmers and those with disabilities may struggle with digital record-keeping and reporting systems.

Evidence provided included concerns of mental health pressures, generational farming practices, and the cultural significance of agriculture in rural areas. There were calls for inclusive policy design, better consultation with affected communities, and tailored support mechanisms to ensure fair treatment and avoid deepening existing inequalities.

Written responses

Table 91 Written Responses to Question 43

Option	Total	Percent
Provided Evidence	2	10%
Did Not Provide Evidence	17	81%
Neutral/Unclear	2	9%
Total	21	100%

In answering this question many respondents raised concerns with rights of farmers being infringed, called for the consultation to be reconsidered and for more time to be given for farmers to respond. It was pointed out that the NAP could disproportionately affect older farmers and small family farms, particularly in rural areas, and that focusing solely on agriculture overlooks other significant sources of nutrient pollution. It was suggested that a more holistic approach is needed, one that addresses all major contributors to water quality issues, not just the agricultural sector.

There were also concerns that the EQIA did not fully consider the potential differential impacts of the proposed measures on various sectors and communities. Some responses highlighted that the phosphorus balance and buffer strip proposals could have significant negative effects on the agri-food sector, with wider implications for rural communities, especially those more economically dependent on agriculture. Similar to the views expressed in response to Question 42 respondents felt the EQIA overlooked the implications of requiring the pig sector to adopt certain measures earlier than other sectors, and the potential equality issues arising from the focused area approach. Respondents recommended that a revised EQIA be undertaken as part of the next consultation phase, with a more detailed assessment of the potential impacts on different sectors, regions, and rural communities.

Again, like the responses to Question 42 Young farmers' representatives expressed concern that the proposed changes could have disproportionate effects on younger farmers for the reasons already outlined.

Some respondents also raised the issue of equality across sectors, arguing that agriculture appears to be the only sector targeted by the proposals, while other organisations, such as water utilities, are not held to the same level of accountability for pollution.

Rural Needs

Question 44: Are there any rural needs comments that you wish to raise at this point?

Citizen Space

There were 536 responses received to this question through Citizen Space.

Those responding to this question expressed their concerns relating to the proposals outlined in the consultation. Many respondents highlighted that farming is the backbone of rural life and the local economy supporting jobs, businesses and food security. It is felt that these proposals will disproportionately harm small and family-run farms making them economically unviable and leading to job losses and will be harmful to rural communities as a whole.

The responses emphasis that consideration needs to be given to economic impact of the proposals will have on the rural economy and it is stressed in the responses that they do not feel this has been adequately addressed. Respondents refer to the economic impact assessment carried out on behalf of the Agri-Food Sector by AgriSearch to support their comments and the impact the proposals will have on farming and the rural economy.

There was a strong emphasis in the responses for a need for more practical support, including grants and improved infrastructure (e.g. broadband) in rural areas.

Written responses

Table 92 Written Responses to Question 44

Option	Total	Percent
Raised Rural Needs Concerns	13	65%
No Rural Needs Comments/No Concern	6	30%
Neutral/Unclear	1	5%
Total	20	100%

A significant number of respondents raised concerns about the potential impact of the proposed NAP measures on rural communities. Many highlighted that the implementation of these measures could undermine the economic sustainability of Northern Ireland's rural economy, with particular risks for those communities heavily dependent on agriculture. Respondents warned of unintended social and environmental consequences, including threats to employment, local businesses, and the viability of family farms.

Others said that the Section 75 screening and Rural Needs Impact Assessment conducted by DAERA were insufficient, noting that the conclusion of "no adverse impact" was not supported by the experiences of rural communities. Several responses criticised the Rural Needs Impact Assessment (RNIA) and the consultation process, arguing that they failed to adequately consider the complexity of the agri-food supply chain and the cumulative impact on farm viability and food production. There was a recurring view that the RNIA did not sufficiently address the potential effects on jobs, poverty, and deprivation in rural areas, nor did it consider the needs of non-farming rural businesses and the wider rural community. Some respondents called for a revised RNIA and a comprehensive economic impact assessment to be undertaken before any further policy decisions are made.

Concerns were also raised about the lack of meaningful engagement with stakeholders during the consultation process, with some stating that the process was rushed and lacked transparency. There were calls for more time, clearer information, and greater support to enable rural stakeholders to fully understand and respond to the proposals.

A number of respondents emphasised the risk of demographic change, with the potential for younger generations to leave rural areas if farming becomes unviable, leading to rural decline

and a widening urban–rural divide. The impact on mental health and wellbeing was also highlighted, with increased anxiety and stress reported among farmers and their families.

Some respondents suggested alternative approaches, such as piloting the proposed measures with volunteer farmers before wider implementation, and ensuring that any new policy is co-designed with those most affected. There was also support for a more balanced, evidence-based approach that takes account of all three pillars of sustainability, environmental, social, and economic, rather than focusing solely on environmental outcomes.

Question 45: Do you have any evidence that would be useful to the Department?

**If so, can you describe the evidence and provide a copy to
NutrientsActionProgramme@daera-ni.gov.uk**

Citizen Space

There were 187 responses received through Citizen Space in response to this question.

Many of the views were the same as that expressed to the previous question (question 44). Those replying to this question in the main emphasised a strong opposition to the perceived unfair treatment of farmers compared to NI Water. Respondents repeatedly criticised NI Water for its role in pollution, arguing that farmers are being penalised more harshly despite contributing less to environmental damage.

Respondents referred to the Economic Impact Assessment carried out by AgriSearch and evidence to be considered by the Department and called for a full economic impact assessment to be carried out, once the proposals have been reconsidered.

Other areas of research referred to in the responses included: a study on sewage effects on waterways by University of Oxford, a report by a UK Scholar Gary Thompson “Fertiliser reduction a road map for UK dairy”, “A pathway to our Renewable Future”, Centre for Advanced Sustainable Energy (CASE) June 2023, and Renewable Energy by David Elliot (2020).

Written responses

Table 93 Written Responses to Question 45

Option	Total	Percent
Provided Evidence	3	13%
Did Not Provide Evidence	19	82%
Neutral/Unclear	1	5%
Total	23	100%

Most respondents did not provide additional evidence either stating they had nothing further to add, had no additional comments, or left the question unanswered.

Concerns about the splitting of interdependent Strategic Environmental Assessments (SEAs) was raised. It was said that this approach risked a fragmented analysis and an underestimation of greenhouse gas emissions by not considering total lifecycle trade-offs of mitigation and adaptation options across policies. It was also pointed out that the risk assessment referenced in the consultation relied on outdated survey data and failed to adequately address the impacts of the proposed changes on farmers and rural communities. The Department was encouraged to conduct a comprehensive and up-to-date rural needs assessment to ensure that the consequences of the proposed policy changes are fully understood.

It was suggested that the proposals could lead to a significant reduction in livestock numbers, with knock-on effects for farms, processing facilities, the transport industry, and the availability of locally produced food. This was presented as a logical outcome based on the scale of the proposed changes, rather than as formal evidence.

Regulatory Impact Assessment

Question 46: Are there any regulatory impact comments that you wish to raise at this point?

Citizen Space

There were 341 responses to this question received through Citizen Space.

As with the previous questions relating to other impact assessments similar concerns were raised in response to this question around viability of farming and the impact on the rural community and food security.

As previously stated, many asked for a full economic impact assessment to be carried out as it is felt that the Department has not adequately assessed the cumulative cost of compliance, equipment and administrative burden imposed by the proposals.

Written Responses

Table 94 Written Responses to Question 46

Option	Total	Percent
Raised Regulatory Impact Concerns	15	68%
No Regulatory Impact Comments/No Concern	6	27%
Neutral/Unclear	1	5%
Total	22	100%

Concerns were raised about the adequacy and scope of the Regulatory Impact Assessment (RIA) accompanying the NAP proposals. Many felt that the RIA failed to fully capture the economic, social, and operational implications of the proposed measures for farm businesses, the agri-food supply chain, and the wider rural economy. The RIA's cost estimates, particularly those relating to the adoption of LESSE, were suggested to be significant underestimates and it was felt these did not reflect the true financial burden on farmers, especially smaller and family-run enterprises.

Respondents also criticised the lack of a comprehensive economic impact assessment, noting that the RIA focused narrowly on environmental outcomes and did not sufficiently consider the broader social and economic consequences. There were repeated calls for a more robust, detailed, and farm-level economic analysis before any final decisions are made. Some respondents pointed to specific omissions in the RIA, such as the costs associated with pest and disease control in buffer strips, additional land requirements for silage storage, administrative burdens, and the impact on digital infrastructure.

A recurring theme was the need for greater policy integration and coherence. Several respondents said that the current approach risked “policy splitting” and “drip feeding” of consultations, which could lead to fragmented analysis, regulatory loopholes, and unintended consequences such as “pollution swapping” between policy domains. There were also concerns about inconsistencies between the consultation document and draft regulations, creating legal uncertainty and undermining stakeholder confidence.

Some respondents called for more nuanced and targeted regulation, suggesting that not all farm businesses should be subject to the same requirements, and that investment might be better directed towards supporting nature-based solutions and ambitious agri-environment schemes. Others emphasised the importance of considering transboundary impacts, particularly in relation to the export of anaerobic digestion (AD) process outputs, and ensuring compliance with international conventions.

There was also criticism that the regulatory focus appeared to be disproportionately on agriculture, with insufficient attention paid to other sectors contributing to nutrient pollution, such as wastewater management. Some respondents advocated for a more holistic, cross-sectoral strategy, with shared responsibilities across society and government bodies.

Alternative proposals included the establishment of a non-regulatory advisory service to support farmers, the introduction of incentives and support for the adoption of best practices, and the need for user-friendly and interoperable digital systems for compliance and reporting.

Question 47: Do you have any evidence that would be useful to the Department?

If so, can you describe the evidence and provide a copy to

NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 168 responses received through Citizen Space to this question.

The responses to this question revealed widespread opposition, primarily from farmers and rural stakeholders to proposed regulatory changes under the NAP, particularly concerning mandatory LESSE, phosphorus and nitrogen limits, and increased administrative burdens. Key concerns include the financial and operational impracticality of LESSE for small farms, rigid phosphorus caps (10 kg/ha by 2027, 8 kg/ha by 2029) threatening livestock viability, and calendar-based slurry spreading restrictions that ignore weather and terrain realities. Respondents said these measures lack scientific justification, disproportionately target agriculture while ignoring pollution from NI Water and urban runoff, and risk undermining food security, rural economies, and mental health.

Supporting evidence includes economic modelling (e.g., AgriSearch estimating £1.56bn annual losses), references to AFBI and Teagasc studies, anecdotal pollution incidents, and critiques of flawed consultation processes and data inconsistencies. Many called for risk-based, farm-specific, and collaborative approaches, with better education, grant support, and recognition of existing good practices.

Written responses

Table 95 Written Responses to Question 47

Option	Total	Percent
Provided Evidence	5	18%
Did Not Provide Evidence	22	78%
Neutral/Unclear	1	4%
Total	28	100%

The need for more nuanced and targeted regulation, particularly regarding the mandatory use of LESSE was highlighted. It was suggested that not all farm businesses should be subject to the same requirements, and that some investment might be better directed towards supporting nature-based solutions and targeted agri-environment measures. There was also a call for greater consideration of transboundary impacts, especially in relation to the export of anaerobic digestion (AD) process outputs, and the importance of compliance with international conventions.

Some respondents emphasised the need for greater transparency and stakeholder engagement in decision-making, arguing that this would help build trust and compliance without the need for coercion, and ultimately achieve better environmental outcomes.

A few respondents reiterated that a full economic evaluation would provide a better understanding of the potential impacts of the proposals, and that the absence of such an assessment undermines the consultation process.

Strategic Environmental Assessment (SEA)

Question 48: Are there any comments you would like to raise at this time regarding the Strategic Environmental Assessment (SEA) Report at this point?

Question 49: Do you have any evidence that would be useful to the Department?

**If so, can you describe the evidence and provide a copy to
NutrientsActionProgramme@daera-ni.gov.uk**

Citizen Space

There were 288 and 149 responses received respectively to these questions through Citizen Space.

Key concerns raised included the view that the revised NAP measures lacked scientific rigour, and relied on flawed or unpublished data, and it failed to account for practical farming realities, especially for small and family-run farms. Respondents highlighted the disproportionate regulatory burden placed on agriculture while overlooking major pollution sources such as untreated sewage discharges from NI Water and urban infrastructure. They raised concerns that the assessment did not take into account the good practices in farming and that the report failed to take into account other sources of pollution and the impact on the economy, social and mental health impacts within rural communities.

Respondents also referred to inconsistencies between the SEA Report and the Consultation report which led to a perception of a flawed consultation process.

There were a few comments, which showed support for the environmental objectives and the need for action on water quality, it was agreed that there was a need for monitoring and enforcement but also a need for further detail on plans for implementation.

Written Responses

Most of the respondents combined their answered to these questions.

Table 96: Written Responses to questions 48 and 49

Option	Total	Percent
Agree	11	10%
Disagree	16	14%
Neutral/No comment	84	76%
Total	111	100%

Respondents to the Strategic Environmental Assessment (SEA) Report raised a number of substantive concerns regarding both the scope and methodology of the assessment. Many felt that the SEA lacked sufficient detail and failed to integrate related policies, such as the Ammonia Strategy and River Basin Management Plans. This fragmentation, they said, risked underestimating greenhouse gas emissions and limited the consideration of alternative approaches. Several respondents highlighted that the splitting of interdependent policy SEAs undermines the effectiveness of the assessment and the definition of viable alternatives.

A recurring theme among the responses was the need for the NAP proposals to be based on more robust scientific evidence and comprehensive economic impact assessments. While there was broad support for the aims of the NAP and the SEA, respondents emphasised that the NAP proposals focused too narrowly on environmental outcomes, neglecting the wider social and economic consequences for rural communities and the agri-food sector. Concerns were expressed about the disproportionate impact on older farmers and the potential for farm closures, reduced domestic food production, and the offshoring of emissions.

Implementation and enforcement of new measures were also key concerns. Respondents agreed with the SEA's conclusion that further detail is required on how these measures will be applied and monitored. The importance of geographic specificity was highlighted, with calls for focused interventions in high-risk areas. Some felt that a limited pilot approach would not be ambitious enough given the urgency of environmental issues. There was strong support for increased inspection rates and transparent enforcement to ensure the efficacy of both existing and proposed measures.

In terms of alternative proposals and solutions, respondents suggested adopting a more ambitious and focused approach to spatially targeted measures, supporting farmers equitably through a just transition to sustainable, nature-friendly farming, and establishing an independent environmental protection agency with stronger enforcement powers. Further research and modelling were recommended to assess the impact of proposed changes, particularly regarding fertiliser classification and nutrient management. Some respondents advocated incentivising buffer areas and encouraging the use of Soil Nutrient Health Scheme data to inform risk-based approaches.

Environmental Impact Assessment (HRA / RIAA)

Question 50: Are there any environmental impact comments you would wish to raise at this point?

Question 51: Do you have any evidence that would be useful to the Department?

If so can you describe the evidence and provide a copy to
NutrientsActionProgramme@daera-ni.gov.uk

Citizen Space

There were 368 and 156 responses received respectively in direct response to these questions.

The responses to this question revealed widespread and strongly negative sentiment toward the proposed environmental measures under the Habitats Regulations Assessment (HRA) within the NAP. Farmers and stakeholders expressed deep concern over the perceived lack of scientific evidence, impracticality, and disproportionate impact of proposals such as mandatory LESSE, rigid phosphorus and nitrogen limits, and calendar-based slurry spreading restrictions.

Respondents highlighted the unfair targeting of agriculture while overlooking major pollution sources like NI Water's untreated sewage discharges, quoting a figure of 20 million tonnes annually, and domestic runoff.

Environmental sector responses, agreed with the assessment of the Habitats assessment and called for urgent action to protect the environment and some were critical saying that the measures don't go far enough to protect already degrading habitats. They advised that recommendations within the Habitats Regulation Assessment must be taken onboard and included for example sufficient detail on the rationale behind the proposed measures as well as the methods of implementation should have been included in the consultation document.

While there was support for action and the direction proposed by the proposals among some of the responses, they asked the Department to give further consideration to the environmental impact concerns raised. There were concerns that some of the proposals could result in unintended environmental consequences, these should be addressed in the first instance. An example of the unintended consequences suggested was the risk of land abandonment and reduced land stewardship as a result of overregulation and financially unviable compliance costs.

Most respondents responding to this question expressed general concerns about the consultation and emphasised that there needs to be support provided especially for the family farm business. Overall, a strong theme coming through was that there needs to be a fair, proportionate and practical approach to nutrient management, one that not only supports environmental goals but are also workable at farm level.

Written Responses

In the written responses there was only a minority who replied directly to these two questions. A majority of the responses from individuals included references to the environment and the impact on the specific measures which have already been highlighted.

There was nothing further raised in the written responses that have not already been highlighted in the summary of the Citizen Space responses.

Overview of other written responses received

On review of the other written responses received they strongly opposed the proposals within the consultation. Most of the responses followed a general theme which we categorised based on the reasons provided in their written responses.

Table 97: Overview of other reasons within the written responses

Other Correspondence – individual responses	Total	Percent
Opposed main reason - Flawed Consultation	652	37.34%
Opposed main reason – Devasting Impact on Farms	208	11.98%
Opposed – Representation from Red Meat Sector	236	13.52%
Opposed – Additional personal opinions	650	37.23%
Total	1746	100%

The consultation process was viewed as significantly hindered by the inconsistent and staggered release of key documents, which led to confusion and made it difficult for stakeholders to fully understand the proposals. The presence of contradictory materials and the late addition of critical evidence further complicated efforts to provide meaningful feedback. In addition, the consultation period overlapped with the peak farming season, severely limiting the time available for stakeholders to review complex technical information. Public engagement was thought to be notably insufficient, with few accessible events or online resources, and questions submitted for clarification were neither answered nor made publicly available. These shortcomings have raised concerns about the fairness and transparency of the process, with stakeholders viewing it as failing to meet basic standards and potentially infringing rights protected by Articles 6 and 8 of the European Convention on Human Rights. In their responses, stakeholders have called for an extension of the consultation period, clearer and centralised information, and improved support for those affected.

Respondents expressed strong objections to the proposals, citing devastating effects on the viability of family farms. Specific concerns included forced reductions in livestock numbers, the necessity to acquire additional land, costly slurry export requirements, and the risk of farm closures due to financial infeasibility. Saying that documentation supporting the proposals was inconsistent and sometimes contradictory, with critical evidence added late in the process. Additionally, the scientific reliability of nitrogen and phosphorus data was

questioned, with particular concern that reducing nitrogen limits may be counterproductive, increasing costs and reliance on purchased phosphorus.

Stakeholder engagement was perceived as poor, with farmers feeling inadequately consulted during both the development and launch of the proposals. Many respondents reported increased stress, anxiety, and a sense of hopelessness caused by the proposals and the consultation process, which they said added to already high rates of mental health issues and suicide within the farming community.

There was a strong sense of generational loss and cultural erosion, with fears that the proposals will end the tradition of family farming and threaten rural heritage and food security. Respondents frequently questioned the scientific and economic rationale underpinning the proposals, alleging that the data used to justify the measures was flawed, manipulated, or selectively presented. Many criticized the absence of a comprehensive economic impact assessment and believed the proposals were driven by a predetermined agenda rather than robust evidence or genuine engagement.

A widespread sense of injustice was evident, with farmers feeling unfairly targeted as the primary source of water pollution, while other contributors such as NI Water, industry, and households were perceived as overlooked or insufficiently regulated. Despite significant efforts and investments already made by the agricultural sector to improve environmental outcomes, agriculture was seen as scapegoated for broader environmental issues.

Despite strong opposition to the current proposals, farmers expressed a willingness to protect the environment and improve water quality. Respondents advocated for a collaborative, evidence-based approach that recognizes the realities of farming and the contributions of other sectors. They called for practical, targeted and supported measures such as education, incentives, phased implementation and stakeholder partnership rather than blanket regulations that threaten the viability of family farms. While most submissions opposed the proposals as drafted a small minority supported the principle of environmental improvement provided it is pursued fairly and with adequate support for those affected. Some respondents proposed constructive alternatives including risk-based regulation, incentives for best practice and greater recognition of existing good stewardship within the farming community.

Recommendations within the Office of Environmental Protection (OEP) Advice Letter²

The Department received an advice letter from the Office of Environmental Protection on 6 June 2025, in response to the Consultation. The advice letter states that the Department must comply with its obligations under environmental law, notably the Habitats Regulations and the Water Framework Directive Regulations.

The letter of advice sets out the following recommendations to the Department:

Table 98: OEP List of Recommendations

	Recommendation
1	DAERA should review the proposed phosphorus balance targets for farms above 150kg N/ha/yr, to ensure they will be sufficient to achieve the intended environmental outcomes
2	To support achievement of the intended environmental outcomes, DAERA should include, in the revised NAP: a) a phosphorus balance target at national scale, and b) a nitrogen balance target at farm and national scale
3	In finalising the amended NAP Regulations, DAERA should provide a rationale for gaps in the regulations and detail the means by which these gaps will be addressed if the intended environmental outcomes are to be achieved
4	DAERA should set out its assessment of the expected contribution of the NAP measures to achieving Environmental Objectives under 6 OFFICIAL the Water Framework Directive Regulations, as part of its finalisation and publication of the amended NAP Regulations
5	In finalising the amended NAP Regulations, DAERA should ensure that the new provisions are sufficient to deliver the intended outcomes, taking into account the future effects of climate change, individually and in combination with other pressures.

² [OEP gives advice to DAERA Minister on Nutrients Action Programme Regulations consultation | Office for Environmental Protection](#)

	Recommendation
6	DAERA should work with the agri-food sector to bring forward a single, integrated roadmap covering both phosphorus and nitrogen efficiency on farms.
7	Alongside amendment of the technical standards of the NAP Regulations, if it has not already done so, DAERA should review incentives, advice and guidance to ensure the sufficiency of these mechanisms in supporting farmers to comply with the regime.
8	DAERA should determine how best to align the focused area approach proposed in the NAP consultation with the proposals for spatially targeted measures in the draft ammonia strategy.

Next Steps

In response to the overwhelming response to the Consultation from across all sectors, the Department acknowledges that the issues are complex and far reaching.

The Minister has been clear in outlining the next steps in the process include the establishment of a Nutrients Action Programme Stakeholder Task and Finish Group, which includes a range of stakeholders from farming, agri-food industry and the environmental sector. The role of this group will be to consider the responses received and any alternative proposals and to make recommendations for revised proposals for the Fifth Nutrients Action Programme.

These recommendations will be considered by Minister, who will determine the basis for the planned next consultation. The Department will engage with the public and stakeholders on the proposals through a further eight week consultation. This will give wider stakeholders and the public the opportunity to comment on the revised proposals.

Following the further consultation, responses will be taken into account before a final revised Nutrients Action Programme is taken forward to the Executive for approval and coming into effect.

Annex A

List of Organisations who responded to the Consultation

- Agricultural Lime Association
- AgriSearch
- Anaerobic Digestation and Bioresources Association
- Antrim and District Angling Association
- APB Food Group ()
- Aphaeas ()
- Ballinderry Bridge Angling Club
- BH Estates
- Carla Lockhart DUP
- Cefetra
- Centre for Advanced Sustainable Energy (CASE) Queens University Belfast
- Chartered Institute of Water and Environmental Management (CIWEM)
- Clean Water Sports Alliance NI
- Clinty Chemicals
- Crumlin and District Angling Association
- DAERA SEA Team SEA NAP
- Dale Farm
- Dairy Council NI
- Diana Armstrong MLA
- DPL
- Dumfries Freight
- Dunbia (Meat Processor)
- Fane Valley
- Farmers for Action
- Fermanagh and Omagh District Council
- Firmus Energy
- Foyle Food Group
- Friends of the Earth
- Geological Survey of Northern Ireland

- HED Response SEA Environmental Response
- Holstein NI
- Independent Fertilisers Limited ta Goulding NI
- Jubilee Veterinary Centre
- Lakeland Dairies
- Livestock and Meat Commission (LMC)
- Lough Neagh Partnership
- Lough Neagh Rivers Trust Waste Water Sampling Project
- Megaw Agricultural Contractors
- Mineral Products Association (Northern Ireland) Ltd (MPANI)
- Mutual Energy
- National Beef Association (NBA)
- National Trust (NT)
- Nature Friendly Farming Network (NFFN)
- NI Environment Link - Sustainable Agricultural Working Group
- NI Environment Link
- NI Food and Drink Association (NIFDA)
- NI Grain Trade Association (NIGTA)
- NI Marine Task Force (NIMTF)
- NI Meat Exporters Association (NIMEA)
- NI Water
- Northern Ireland Agriculture Producers Association (NIAPA)
- OEP Letter
- Phoenix Energy
- Preferred Capital Management
- Ready Eggs Group
- Robbie Butler MLA
- RSPB
- Sinn Fein
- Sofina Foods
- Stream Bioenergy
- The Lough Neagh Rivers Trust
- The Rivers Trust
- Thompson Feeds

- Tobermore
- UAF
- Ulster Arable Society
- Ulster Farmers Union (UFU)
- Ulster Pork and Bacon Forum
- Ulster Wildlife
- United Feeds
- Veterinary Surgeons Supply Company Ltd
- WD Meats
- World Animal Protection
- Yara
- Young Farmers Clubs of Ulster

For further information:

Environmental Farming Branch
Clare House
1st Floor West,
303 Airport Road West
Sydenham Intake
Belfast BT3 9ED

Email: NutrientsActionProgramme@daera-ni.gov.uk



Department of
**Agriculture, Environment
and Rural Affairs**

An Roinn

**Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe**

Depairtment o'

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