

NAP Stakeholder Forum

Monday 27th July 2026
AFBI Hillsborough

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Department of
Agriculture, Environment
and Rural Affairs
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Topics to cover

- Development from 2025 NAP proposals.....

You Said....., We Did.....

- Proposed NAP measures on:
 - Phosphorus
 - Nutrient Stewardship Programme (NSP)



You Said, We Did...

Theme	You said...	We did...
Engagement and transparency	engagement and communication should be improved. greater transparency.	Established a NAPSTFG and specialist subgroups to co-design proposals. Committed to ongoing engagement, publication of supporting evidence, and clearer communication
Practical, workable measures	some proposals were not practical or reflective of real farm conditions. should be evidence-based	Developed proposals through a co-design process with the NAPSTFG and its subgroups. Greater emphasis on practical solutions that are workable at farm level, Supported by advisory services and phased delivery (e.g. Nutrient Stewardship Programme and the Tiered approach to LESSE).
One size does not fit all	A one-size-fits-all approach is not appropriate. Measures should be flexible and risk-based, particularly for buffer strips, LESSE and nutrient limits.	Proposing to introduce a focused, catchment-based approach to target action where risks are highest. Relevant measures include tiered and phased implementation, with flexible pathways to reflect differences between farms.

You Said, We Did...

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Cost and farm viability	costs and impacts on farm viability are a major concern, especially for smaller farms and in relation to measures requiring new equipment or infrastructure.	Proposing that some measures be delivered over time, allowing farms to adapt (e.g. phased LESSE implementation to 2030). Aligned proposals with financial support, including the Sustainable Agriculture Programme, and included measures to improve efficiency and reduce input costs. A detailed and rigorous Regulatory Impact Assessment has been prepared to accompany the NAP consultation. This provides the costs and benefits of implementing the revised proposed measures. A full Economic Impact Assessment will be finalised as part of the work of the NAPSTFG and this will be essential to help inform implementation.
Science and evidence	scientific basis for some proposals was unclear stronger evidence, transparency and alignment	The new proposals are based on expert input from specialist subgroups, the NAP Review Report and monitoring data. Proposing that some standard nutrient excretion values be updated to reflect current production systems, with a focus on

You Said, We Did...

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Efficiency and innovation	Support improved nutrient efficiency and circular approaches, but that greater clarity is needed on how these would work in practice.	Proposing to introduce measures to help support slurry processing, processed organic fertilisers, anaerobic digestate management, strengthen nutrient tracking and develop a Nutrient Efficiency Roadmap to guide longer-term improvements.
Advisory and voluntary approaches	advisory, voluntary and supported approaches are preferable in some areas, rather than additional regulation.	Proposing to introduce a mix of advisory, voluntary and regulatory measures, supported by CAFRE and wider advisory services. Measures such as liming, buffer strips and nutrient management are supported through guidance and knowledge transfer, alongside targeted regulation where needed.
	greater investment in advice, guidance and financial support is needed to help farmers comply with the regulations.	Proposing to expand advisory support including CAFRE, industry engagement, catchment-based advice and peer learning, alongside funding schemes and knowledge transfer measures. A Nutrient Efficiency Roadmap will be developed to support core advisory messages and implementation.

You Said, We Did...

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Administrative burden	concerns about complexity, paperwork and administrative burden, particularly for smaller farms and new digital systems.	Proposing systems to simplify and modernise record-keeping, including improved online reporting. Focused on proportionate, risk-based enforcement rather than blanket increases in inspection.
Phosphorus and nitrogen limits	concerns about proposed phosphorus and nitrogen limits, including feasibility, production impacts and lack of clarity.	Proposing a combination of measures to reduce nutrient surplus over time, rather than relying on a single limit. This approach focuses on improving efficiency while allowing flexibility for different farm systems to contribute to overall reductions.
Enforcement and penalties	the enforcement approach and penalties should be clearer and sufficient to incentivise compliance.	Proposing a clearer enforcement framework, including strengthened inspection provisions and measures addressing false or misleading information.

You Said, We Did...

Theme	You said...	We did...
Soil analysis and nutrient planning	soil analysis should be mandatory, and that fertiliser and manure applications should be based on crop need.	Proposing expanded requirements for soil testing and nutrient management planning, linking fertiliser and manure use to soil need and crop demand.
Air pollution (ammonia) controls.	nutrient controls should address air pollution as well as water pollution.	Proposing to introduce ammonia mitigation measures including LESSE, urea controls and slurry storage cover requirements, linked to wider air quality policy.
Contribution to Water Framework Directive objectives	the NAP should clearly demonstrate how measures contribute to Water Framework Directive objectives (WFD).	Set out in the legal framework (Part 2.2) how measures support WFD objectives, including reducing nutrient runoff and improving water quality to achieve “good status”.
Nutrient efficiency roadmap	a joined-up sector-wide roadmap is needed for improving nitrogen and phosphorus efficiency.	Proposing the development of a Nutrient Efficiency Roadmap for NI, co-designed with stakeholders and supported by governance arrangements.

You Said, We Did...

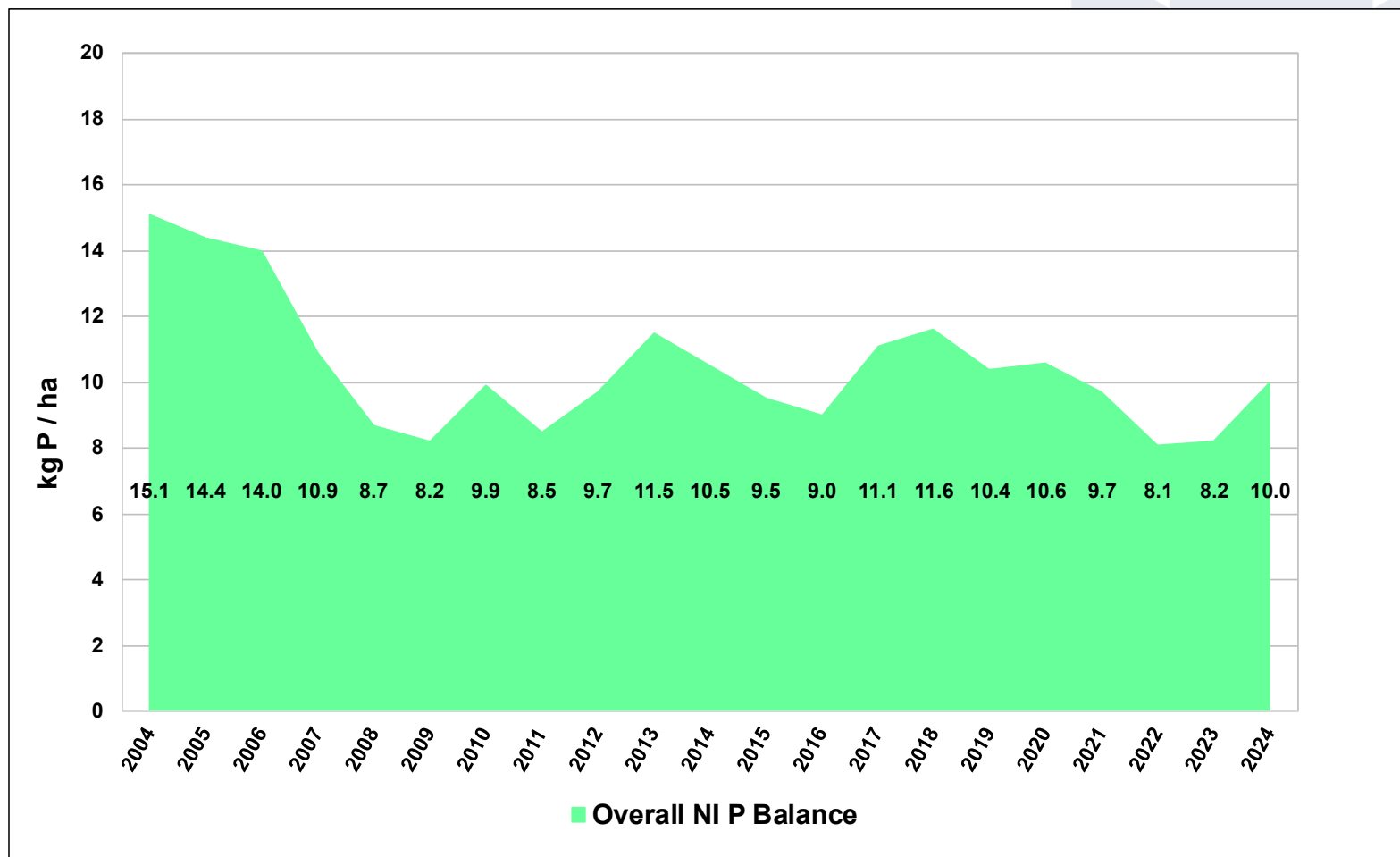
Theme	You said...	We did...
Review phosphorus balance targets for intensive farms	Proposed phosphorus balance targets, particularly for more intensive farms, should be reviewed to ensure they are sufficient to achieve environmental outcomes.	Proposing to introduce measures to reduce phosphorus surplus,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

Phosphorus (P)

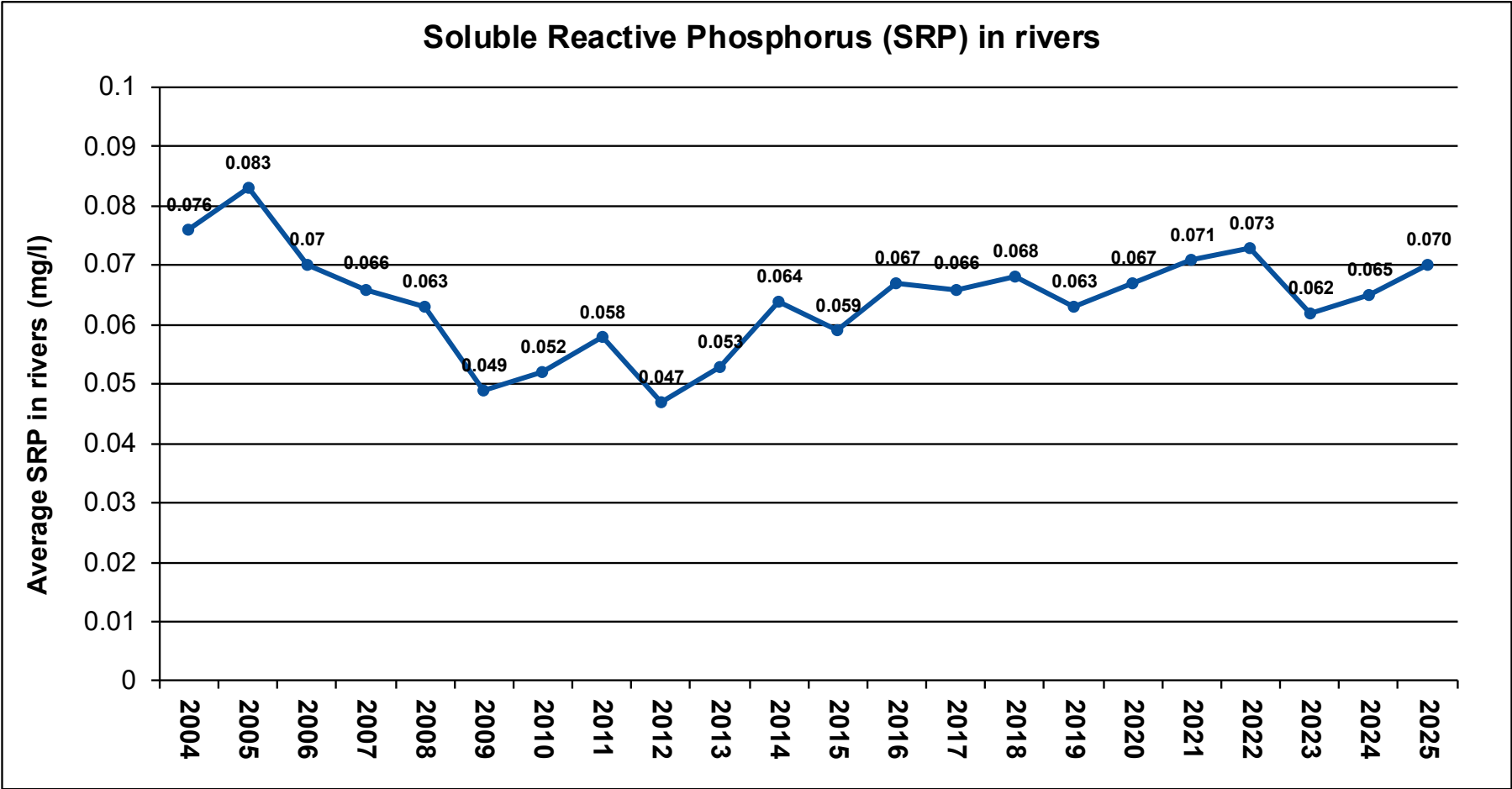
- NI Agricultural P Surplus and background context
- P reduction measures:
 - Chemical P Fertiliser
 - P Balance requirements



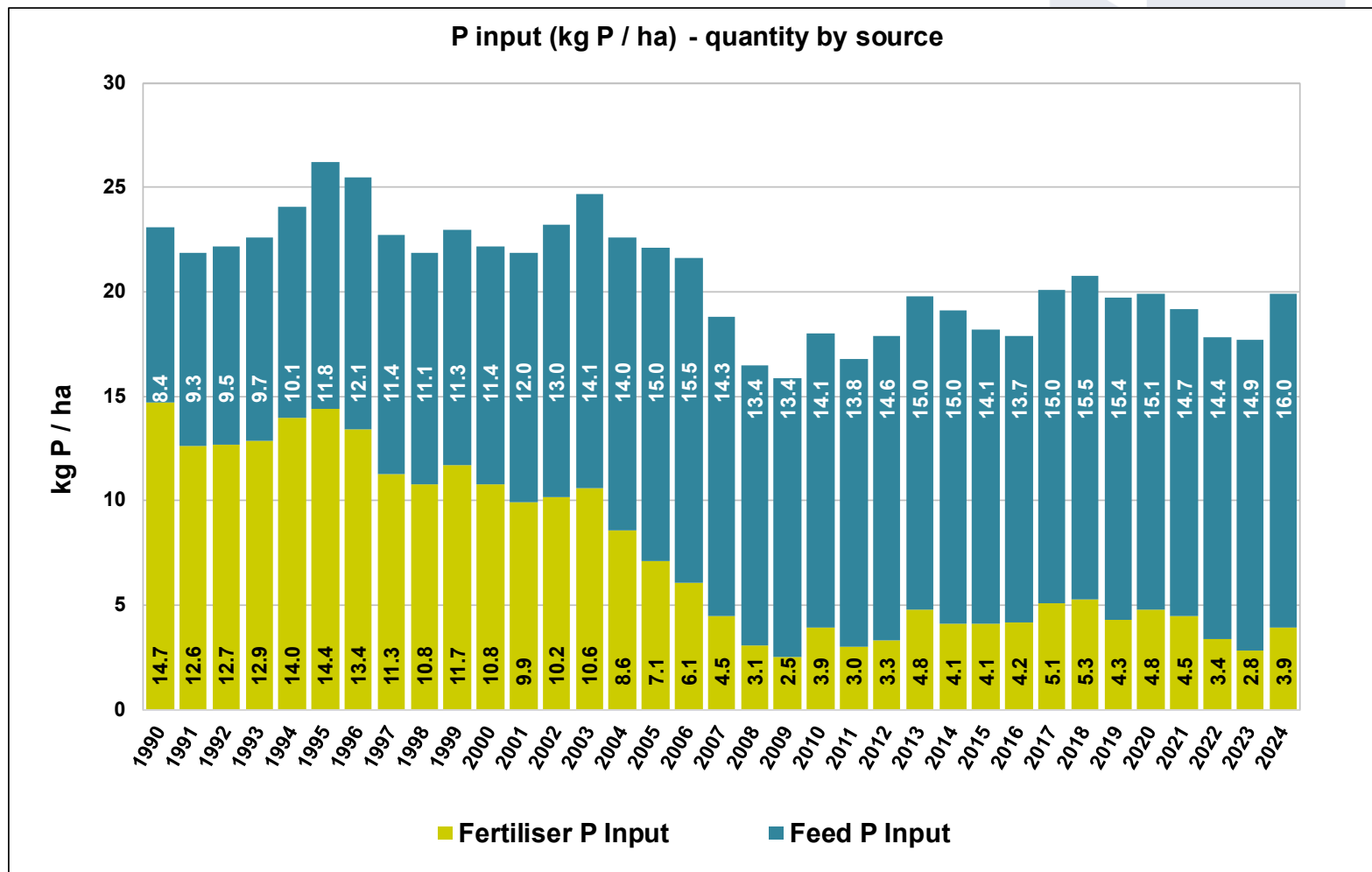
Overall NI Agricultural Phosphorus Balance



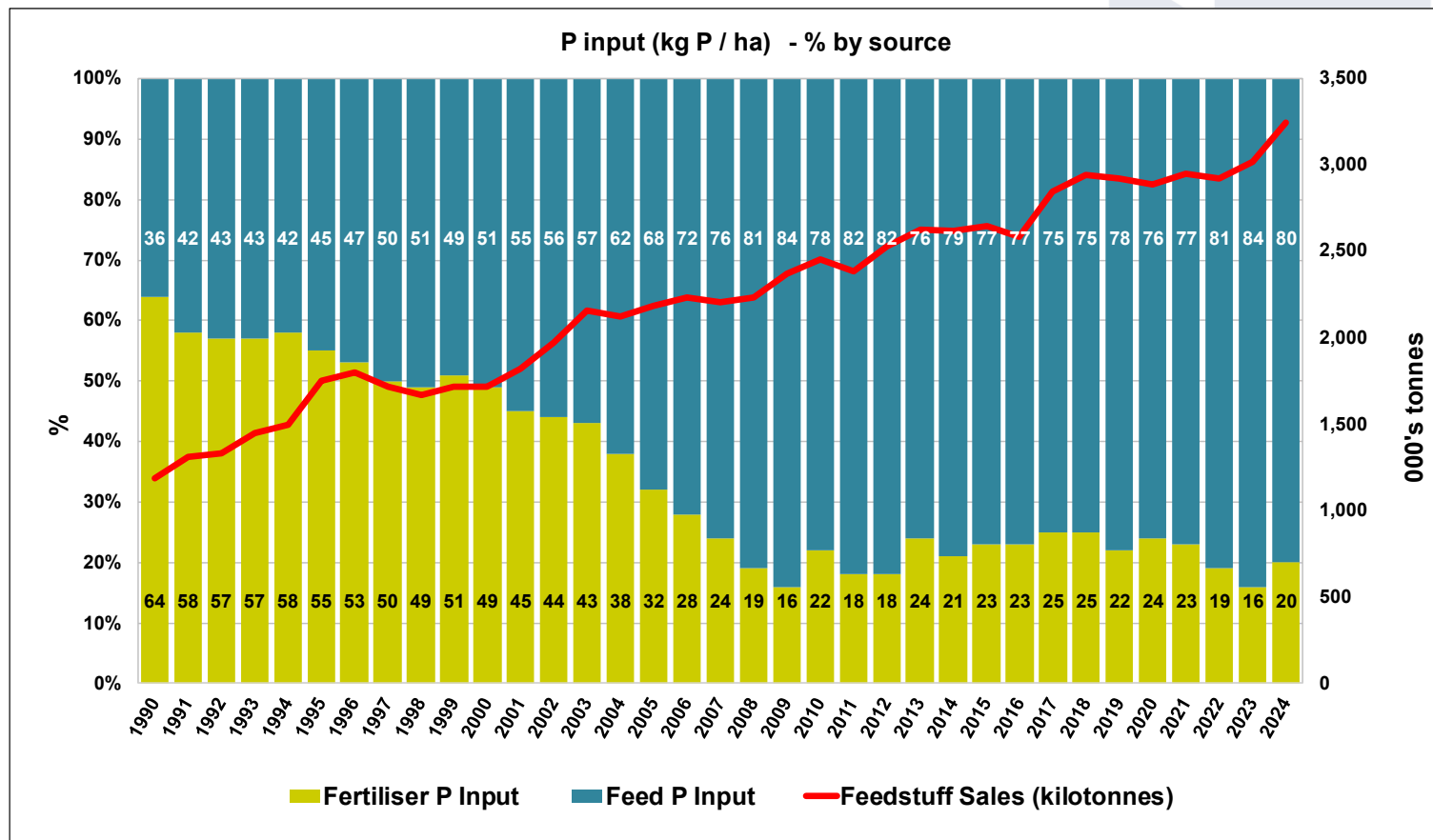
SRP levels in NI rivers



P inputs from Fertiliser and Feed



P inputs from Fertiliser and Feed



1990 - 36% Feed / 64% Fertiliser

2024 – 80% Feed / 20% Fertiliser



NI Phosphorus Balance - 2024

Inputs	
Fertiliser	3,426 t
Feed	13,957 t
Total Inputs	17,382 t

Outputs	
Grass-based livestock, beef, sheep and milk	4,710 t
Pigs, poultry & eggs	3,261 t
Arable	682 t
Total Outputs	8,653 t

P Balance	
Inputs	17,382 t
Outputs	8,653 t
Balance	8,729 t

P Surplus = 8,729 t

Livestock Feed – average P content = 0.43%



Phosphorus - context

- The Northern Ireland agricultural sector is operating at a phosphorus surplus. This surplus is a key driver of agriculture P reaching waterways
- Manure P alone exceeds crop needs (123% in Lough Neagh Catchment)
- Excess soil P in c. 40% of land increases diffuse pollution risk



Phosphorus - context

- Research has shown a direct link between the surplus soil test P in a catchment and SRP concentrations in rivers (Scott et al, 2024).
- Where soil P is above the agronomic requirement for a crop some of the P not taken up by the crop is available for loss to water
- Therefore, excess soil P is a significant source of diffuse nutrient pollution.



Phosphorus (P) reduction measures

- Chemical Fertiliser P reduction measures
- Manure processing and nutrient export inc. SULS, SULM
- P Balance - Farming Practice to increase nutrient use efficiency

Supported by Nutrient Efficiency Roadmap, mandatory labelling of P content of Feed.

Responsible Phosphorus Management (RPM) campaign.



Options to Reduce Chemical P Fertiliser use

- **Option 1: Conditional Exemption**
 - Requires farmers to obtain exemptions before applying chemical P fertiliser under specific conditions like reseeding.
- **Option 2: Restrict Low-P Fertilisers**
 - Remove fertilisers with less than 15% P_2O_5 from sale to reduce habitual and unnecessary phosphorus applications by farmers.
- **Option 3: Responsible Phosphorus Management: Hybrid Approach**
 - Limiting P Fertiliser product availability, Fertiliser Merchants and P.O.S, RPM and review after 2 years.



Reducing Chemical P Fertiliser use

- **Option 3: Responsible Phosphorus Management: Hybrid Approach**
 - Existing NAP Requirement – P Fertiliser to crop need, soil test, NMP
 - Limit P Fertiliser product availability,
 - Grassland compound P Fertilisers (<15% P_2O_5) – 4 products, 4% P.
 - Fertiliser Merchants training on Water Quality
 - Fertiliser Merchants training on Nutrient Management Planning
 - P.O.S, RPM information campaign
 - Review progress after 2 years.



Farm P balance

Farming Practice to increase nutrient use efficiency



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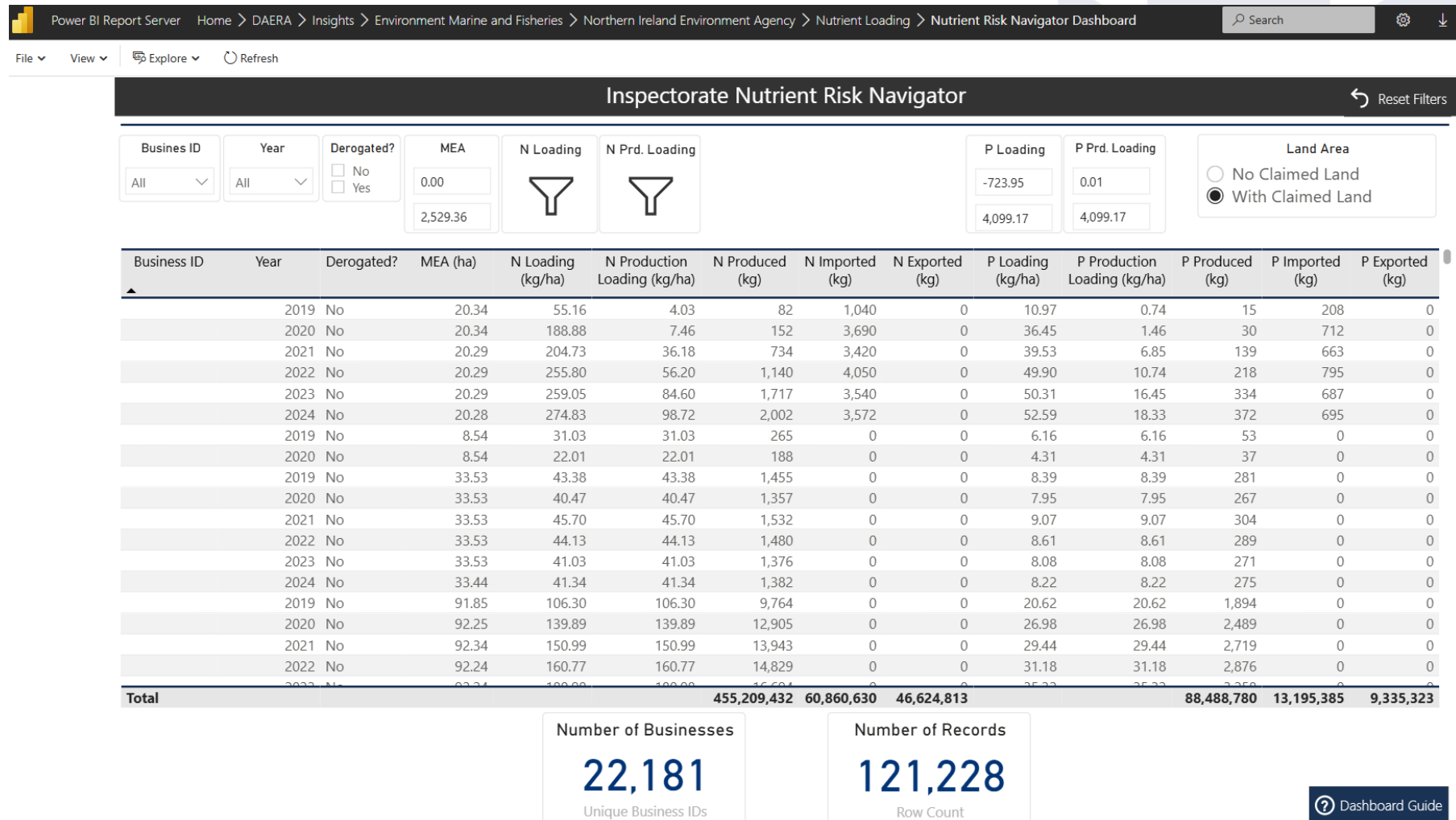
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Farms where P Balance will be required

- Identify farms which are likely to have high P surplus
- By focusing P Balance to these farms, greatest impact can be achieved from lowest number of farms.
- Farms with higher livestock density have higher N and P production.
- Other farms will contribute to P surplus reduction, primarily by reductions in Chemical P Fertiliser use.
- All derogated farms already operate within a P Balance of 10 kg/P/ha/year



Nutrient Risk Navigator Dashboard



2,110 Farms with N Production >=170 kg N/Ha - 2024

N Production (kg N / Ha)	P Production (kg P / Ha) does not include imports/exports					
	0 - 9.9	10 - 14.9	15 - 19.9	20 - 24.9	25 - 29.9	30+
170+	0	0	0	0	0	2,110

All 2,110 farms with N Production >= 170 kg N/Ha produce more than 30kg P/Ha

Farm P balance and Nitrogen production

- P Balance requirement applies to all farms with **N Production** ≥ 170 kg N/Ha .
- All pig and poultry farms must operate at an **N Loading** < 170 kg N/Ha
- Farms with grazing livestock may apply to operate under the Nutrient Stewardship Programme (NSP).
- Subject to the additional Nutrient Management requirements of NSP, farms may operate at an N loading of < 250 kg N/Ha.



Farm P balance : pathways for farmers

- Once calculated there are 3 options...
 1. below 10kg P ha/yr
 - no reduction required
 2. above 10kg P ha/yr
 - join the Nutrient Stewardship Programme
 - minimum 10% reduction or achieve 10kg P ha/yr
 3. above 10kg P ha/yr
 - minimum 15% reduction or achieve 10 kg P ha/yr



Farm P balance : pathways for farmers

- **Soil P Protocol**
- Farms must demonstrate that weighted average soil phosphorus levels are stable or decreasing by the end of the 4 year period .
- A farm may follow the terms of the Soil P Protocol as a complementary means of demonstrating effective soil P management.
- Protocols for pig and poultry farms to demonstrate sustainable management of P as a complementary means to a farmgate P Balance have also been developed.



Farm P balance : P Protocol

Clarification

The soil P protocol only applies as a complimentary option to the P Balance measure.

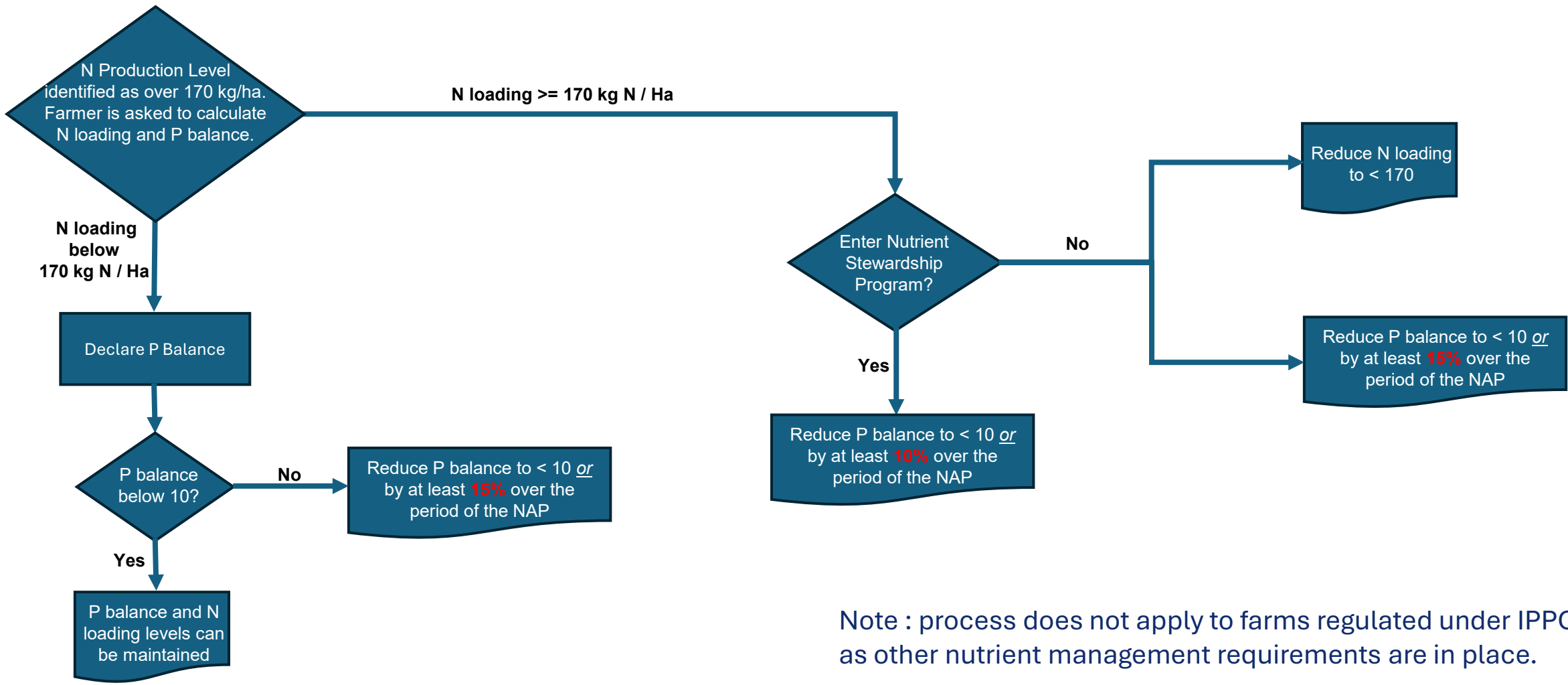
It is not an alternative to meeting the 170 kg N /ha/yr Nitrogen loading limit or other NAP measures.

Protocols for pig and poultry farms also only apply as a complimentary option to the P Balance.

They are not an alternative to meeting the 170kg N limit or other NAP measures such as applying high P manures to crop requirement in accordance with a soil test and NMP.



P Balance requirements: apply to farms with Livestock Manure Nitrogen production of ≥ 170 kg N/ha/year



Note : process does not apply to farms regulated under IPPC, as other nutrient management requirements are in place.

Potential impact of P surplus reduction

- **2024 P Surplus = 8,729 tonnes**
- 30% reduction = approx. 7 kg/P/ha National P Balance
 - 30% reduction in P surplus would remove 2,619 tonnes

Reduction to be achieved from:

- reduced Chemical P Fertiliser use
- manure processing and P export (Tully AD Phase 2, SULS, SULM, etc..),
- farm efficiencies resulting from P Balance (eg, lower concentrate feed rate per litre of milk)



Nutrient Stewardship Programme

- Aims to have an increased number of farms on a pathway to optimal nutrient efficiency,
- Lead to lower nutrient losses and encourage biodiversity-friendly farming.
- Support productive grass-based systems, lower fertiliser and feed imports, and improved farm resilience
- Better aligns the programme with NI soil conditions and wider agri-environmental policy goals



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Overview & Key Changes to Current Derogation Rules

- **Requirements to be Retained :**
- Grazing livestock requirement
- Annual nutrient planning (Fertilisation Plan & Account.
- Maximum Nitrogen loading limit ≤ 250 kg N/ha/year (ruminant only)
- Soil analysis every 4 years
- Slurry spreading rules (50% before 15 June; LESSE after)
- Cultivation timing controls



Proposed Changes : Nutrient Stewardship Programme

1. Grassland Area Requirement (80% → 70%)
2. Phosphorus Balance Reform
3. Removal of Clover & Legume Restrictions
4. Application Process Reform
5. New Inspection Regime
6. Training Requirements – mandatory for Tier 2
7. Programme Review after 2 and 4 years



Nutrient Stewardship Programme

- Two Tier structure

Tier 1:

- existing derogation farms
- new entrants meeting all criteria inc P Balance of 10kg P/ha
- one application for 4-year duration of NAP
- inspection rate 1%

Tier 2

- must meet all criteria except P Balance of 10kg P/ha
- must reduce P Balance by at least 10% over 4-year of NAP or to 10kg P/ha
- annual application each year
- inspection rate 5%



Thank you.

Q&A – at panel session.



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