

Nutrients Action Programme Consultation

September 2026

The Rivers Trust is the umbrella body for the rivers trust Movement across Great Britain, Northern Ireland and the Republic of Ireland.

We represent over 65 rivers trusts across these islands, 21 of which are on the island of Ireland. All river trusts are working across defined whole-catchment areas to achieve better outcomes for water quality in our rivers, loughs, groundwaters and near-shore environments, as well as protecting and restoring biodiversity, and building climate resilience.

Collectively we work directly with those who own and manage the land and our waterways, as well government and statutory bodies, local authorities, non-government organisations, researcher institutions, businesses, recreational users of our waterways and wider community stakeholder, to achieve our vision of **wild, healthy, and natural rivers, valued by all**.

This consultation response is made by The Rivers Trust. Some members of the rivers trust Movement may also be providing independent comments. If you would like to discuss anything in this document further, we would be happy to do so.

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Introduction

The Rivers Trust welcomes this opportunity to comment on the revised Nutrient Action Programme (NAP) consultation, following our involvement in the Northern Ireland Environment Link delegation of eNGO representatives to the NAP Stakeholder Task and Finish (T&F) Group, established by Minister Muir, and effective between October 2025 and July 2026.

The Rivers Trust's vision is for wild, healthy and natural rivers, valued by all; and it is with this vision that we entered the NAP T&F Group process and further comment on the consultation here.

For The Rivers Trust, during this process the focus has been on:

1. reducing the impact of agricultural practices on water quality and water dependant species and habitats;
2. supporting a just transition for the agri-sector towards sustainable and water friendly farming practices, through win-win solutions for agriculture and environment, and;
3. embedding cross-sectoral design and on-going review principles into this NAP, so that progress towards achieving intended targets can be monitored and adapting accordingly to achieve the best outcomes for our water environment and a sustainable agri-sector.

We believe that the revised NAP proposals do have the potential to deliver on the above points, providing that they are:

1. delivered in full;
2. complied with in the spirit in which they are intended,
3. properly enforced by the Department of Agriculture, Environment, and Rural Affairs and its Northern Ireland Environment Agency and;
4. properly resourced by the Northern Ireland Assembly and Executive.

All the above is predicated on the NAP successfully being passed by the Assembly in the current mandate, ending in May 2027. With the timeline for passing this legislation through the Assembly already being extremely tight, and the urgency with which both our water environment requires tighter protections and the agri-sector require clarification to underpin sustainability, we expect that relevant stakeholders and political representatives and their parties will support the adoption of the revised NAP. Urgent, collective, and direct action must be taken now to prevent any further deterioration of our water environment and the associated damage to freshwater species, habitats, source drinking water supply and economic and social losses incurred through a degraded freshwater environment.

It is also imperative that the proposed NAP is compliant with legal requirements and obligations set out in other pieces of legislation, for example The Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017; and The Conservation (Natural Habitats, etc.) (Amendment) Regulations (Northern Ireland) 2026; and policies, for example the Programme for Government; and the Environmental Improvement Plan for Northern Ireland, designed to protect the environment. The latter contains an explicit target that by 2028, there must be a 50% reduction in the amount of phosphorus applied to land in chemical fertiliser, compared to 2023. The targets set in this NAP must be assessed against these and other agreed targets to ensure parity across all legal and policy frameworks.

Furthermore, The Rivers Trust believes that it is also imperative that the proposed NAP measures are monitored for any environmentally negative unintended consequences arising

from the measures themselves and/or divergence with the approach taken to NAP in the Republic of Ireland. We believe that one of the great strengths of this proposed NAP is its tailored approach to the circumstances in Northern Ireland, but careful monitoring and review must be undertaken, and corrective action taken, if negative, unintended consequences emerge.

Related to the above, The Rivers Trust considers robust governance, monitoring and review arrangements essential to the effective implementation of the NAP. The new approach outlined in the consultation document is a critical component of the revised measures and was fundamental to securing environmental NGO support. We therefore strongly urge that the proposed review and governance mechanism is embedded in the regulations through clear statutory obligations, with the NAP Steering Group given an explicit statutory remit and role. The Group should agree review metrics and targets as a matter of urgency, providing clarity for the regulated community and assurance to all stakeholders that the programme is delivering pathways towards improved water quality. In line with the consultation document's emphasis on transparent reporting, The Rivers Trust also recommends establishing a public-facing dashboard through which interested parties can monitor progress against relevant metrics.

In the current NAP proposal, there is a greater emphasis on voluntary measures than in previous NAPs or in the May 2025 consultation proposals. Considerable reliance is placed on guidance and support to help landowners make informed decisions about sustainable land management. This must be underpinned by tailored, meaningful and effective training that meets the needs of farmers and landowners, communicates relevant technical agricultural and environmental information, and explains the wider environmental context, the urgency of action and the consequences of inaction. Given the importance of this guidance and support, to the success of the implementation of this NAP, The Rivers Trust insists that this must be properly resourced, and the content codesigned with relevant stakeholders to ensure its suitability and effectiveness.

The Rivers Trust believes that the NAP should be viewed within the broader transition towards a more sustainable and resilient food production system in Northern Ireland. While the NAP is a critical tool for reducing nutrient pollution and improving water quality, lasting environmental improvement will require a wider strategic vision for agriculture that balances food production with the protection and restoration of the natural environment, supports viable farm businesses and strengthens rural communities. The Rivers Trust therefore urges DAERA to develop and publish a long-term strategy for sustainable agriculture that explicitly addresses nutrient surpluses, water quality recovery, climate resilience, biodiversity restoration and farm profitability in an integrated manner. The NAP should form part of this wider framework and be aligned with Northern Ireland's environmental obligations and targets. Without a clear strategic direction for the future of the agri-food sector, there is a risk that successive NAP reviews will focus on managing the symptoms of nutrient pollution rather than addressing its underlying causes. A more ambitious and joined-up approach is needed to deliver the transformational change required to restore Northern Ireland's rivers, lakes and estuaries while supporting a thriving and resilient farming sector.

The Rivers Trust welcomes the measures proposed within this NAP, and this opportunity to further comment of the proposals in the current consultation.

Nutrient Management - Balanced Nutrient Use, Fertiliser and Manure Controls

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

Agree

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

The Rivers Trust recognises that the proposed advisory approach to managing chemical phosphorus fertiliser on grassland is more workable at farm level than the measure consulted on in 2025 and could contribute to reducing Northern Ireland's excessive phosphorus surplus. However, with phosphorus identified as a major cause of poor water quality and monitoring showing deterioration across Northern Ireland's waters, guidance alone will not provide sufficient assurance. The regulations must require robust, independent/non-regulatory advice and support which is properly resourced, effective controls on fertiliser use and sales, reliable data collection, and transparent reporting of outcomes. The proposed two-year review is therefore critical and should be placed on a statutory footing, with progress assessed against the Environmental Improvement Plan commitment for phosphorus reduction. If monitoring shows that this reduction has not been achieved, or that water quality is not improving, the regulations should trigger immediate additional mandatory controls, including reconsideration of the stronger approach proposed in this consultation. Northern Ireland's rivers, lakes and coastal waters cannot sustain further delay. The NAP must deliver measurable reductions in phosphorus losses and enable prompt corrective action where voluntary measures are shown to be failing.

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

Agree

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

The Rivers Trust supports the proposal to establish pathways to reduce Northern Ireland's national average phosphorus surplus by 30% from the 2024 level over the 2027-2030 NAP period. Excess phosphorus is a major driver of poor water quality, and reducing the amount retained within the agricultural system is essential to limiting further losses to rivers, loughs and coastal waters. The proposed pathways provide greater flexibility for farm businesses while directing action towards improved nutrient efficiency, including lower phosphorus inputs, better use of soil and farm nutrient data, and targeted reductions by farms with the greatest surpluses. However, flexibility must not weaken delivery. The 30% reduction should be treated as a clear, measurable minimum outcome, supported by credible farm-level data, transparent annual reporting and robust oversight by the Department and the NAP Steering Group. Progress should be reviewed regularly, with timely advice and support for farmers, but the regulations must also specify mandatory corrective measures where agreed milestones are missed or water quality does not improve. Northern Ireland cannot afford another NAP cycle in which nutrient surpluses remain high while its waterways continue to deteriorate; these pathways must deliver demonstrable reductions in phosphorus losses from agriculture and related measurable improvements in the water environment.

In addition, The Rivers Trust considers that there is greater clarity required on the obligations applying to poultry farms operating below the IPPC threshold. These farms must

not be permitted to retain a high phosphorus surplus indefinitely while awaiting off-farm or “end-of-pipe” solutions. The Department should set a clear and enforceable timeframe for the development and deployment of off-farm poultry litter/manure-processing capacity, alongside interim requirements for every farm to demonstrate measurable reductions in its phosphorus surplus. Delivery must be adequately funded and supported through more than just a further commitment to the SULM’s scheme. The Department must also work proactively with the poultry sector, technology providers, processors, investors and other relevant partners to identify viable routes to commercial scaling, remove barriers to adoption and accelerate the deployment of proven and emerging technologies for processing manure off farm. Without a funded implementation pathway, defined milestones and clear accountability, there is a significant risk that technological solutions will be delayed while nutrient surpluses continue to damage Northern Ireland’s rivers, loughs and coastal waters.

Finally, The Rivers Trust insists that a clear timeframe is set out within which ‘Tier 2’ farms within the Nutrient Stewardship Programme reach the target of 10kg of P per hectare per year. We want to emphasize strongly that the 10% reduction required over the period of this NAP should not be seen as an end point or final target. As a cross-sectoral representative body, the NAP Steering Group should agree a reasonable timeframe within which Tier 2 farms can achieve this initial reduction target. This should be incorporated within regulations so that all stakeholders are clear as to the longer-term requirements and can plan accordingly. Further detail is provided in our answer to consultation question 15.

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

Strongly agree

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

No further comments

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

Strongly agree

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

No further comments

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

Strongly agree

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

No further comments

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

Strongly agree

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

No further comments

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

Strongly agree

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

No further comments

Manure Storage and Application Requirements – Ammonia Implications

8) i. To what extent do you agree or disagree with the proposal to reduce the maximum single application rate of slurry from 30 m³/ha to 25 m³/ha during the month of February and the period of 30th September to 15th October?

Strongly agree

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

Reducing the maximum single application rate of slurry from 30 m³/ha to 25 m³/ha during February and the period from 30 September to 15 October is a proportionate measure that will help reduce the risk of nutrient losses to water at times of the year when soils are more vulnerable to runoff and crop nutrient demand is lower.

Smaller slurry applications are more likely to match the nutrient uptake requirements of the receiving crop and reduce the amount of phosphorus and nitrogen available for loss during rainfall events. This should be expected to contribute to lowering the risk of phosphorus entering rivers and loughs through surface runoff, helping to address eutrophication and improve water quality.

The Rivers Trust considers this to be a sensible and evidence-based measure that forms an important part of the wider package of actions proposed to reduce Northern Ireland's phosphorus surplus and improve the condition of the aquatic environment. Its effectiveness, however, will depend on strong compliance, monitoring and enforcement, together with complementary measures such as nutrient planning, low-emission slurry spreading and reductions in overall farm nutrient surpluses.

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

Strongly agree

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

No further comments

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

Agree

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

The Rivers Trust supports the proposed phased rollout of Low Emission Slurry Spreading Equipment (LESSE) based on farm size. This is a more practical and proportionate approach than the blanket implementation proposed in the May 2025 consultation, recognising both the environmental benefits of LESSE and the practical constraints facing the sector. The tiered approach appropriately prioritises larger farms, where the greatest environmental gains can be achieved, while allowing smaller farms additional time to adapt and avoiding the risk of equipment supply and contractor capacity being overwhelmed by a rapid, universal requirement. By balancing environmental ambition with deliverability, this approach is more likely to secure high levels of adoption, compliance and long-term improvements in nutrient use efficiency, air quality and water quality.

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

Strongly agree

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

No further comments

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

Strongly agree

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

No further comments

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

Agree

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

The Rivers Trust supports the proposal to manage the use of urea fertiliser through a seasonal requirement for protected urea applications from 1 April each year. This represents an important measure to reduce ammonia emissions while recognising the practical and economic considerations associated with a year-round requirement. We welcome DAERA's proposed balanced approach, which seeks to deliver environmental improvements while facilitating adoption across the farming sector.

However, support for the seasonal approach must be accompanied by a clear commitment to review its effectiveness. The Rivers Trust considers it essential that compliance rates and the resulting ammonia emission reductions are assessed as part of the proposed two-year review process. If compliance levels are found to be insufficient, or if monitoring and modelling demonstrate that the seasonal approach, either alone or in combination with other measures, is not delivering the ammonia reductions required to meet environmental objectives, the regulations should contain a clear mechanism to trigger mandatory use of protected urea throughout the year. This would provide certainty that the measure can be strengthened if necessary and ensure that the NAP remains capable of delivering its intended environmental outcomes

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

Agree

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

The Rivers Trust supports the proposed controls on anaerobic digestate and recognises that anaerobic digestion can play an important role in improving the management of livestock manures and reducing the risks associated with nutrient losses to the environment. In particular, measures that improve the tracking, reporting and responsible land application of digestate should help ensure that nutrients are used more efficiently and reduce the risk of phosphorus entering rivers and loughs. Given the significant contribution that phosphorus pollution makes to poor water quality across Northern Ireland, it is important that all organic nutrient sources, including digestate, are subject to robust controls and nutrient accounting requirements.

However, The Rivers Trust wishes to emphasise that anaerobic digestion should not be viewed as a 'golden bullet' solution to Northern Ireland's phosphorus problem. While AD can alter the form in which nutrients are stored and transported, it does not remove phosphorus from the system. Unless phosphorus is physically exported out of catchments or recovered through processing and reuse pathways, the underlying nutrient surplus remains. Therefore, anaerobic digestion should be considered one tool within a wider nutrient management strategy, rather than a substitute for reducing overall phosphorus surpluses at source.

The Rivers Trust therefore supports the proposal, provided it is implemented alongside wider measures to reduce phosphorus surpluses, improve nutrient use efficiency and facilitate the movement of excess nutrients away from areas of greatest environmental risk. Only through a combination of these approaches will Northern Ireland achieve the sustained reductions in phosphorus losses required to restore and protect water quality.

Farming Practices to Improve Nutrient Use and Water Quality

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

Agree

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

The Rivers Trust supports the introduction of the Nutrient Stewardship Programme (NSP) as a potentially important mechanism for improving nutrient efficiency and reducing nutrient losses to Northern Ireland's waterways. We recognise the need to bring farms currently operating at high nutrient loading rates outside the existing derogation framework into a more structured, monitored and accountable system. The NSP has the potential to place these farms on a pathway towards more sustainable nutrient management while contributing to improved water quality outcomes.

However, the success of the NSP will depend on robust monitoring, clear regulatory safeguards and demonstrable environmental outcomes. The consultation proposes a two-tier approach, with Tier 1 for farms meeting the phosphorus balance standard of no more than 10 kg P/ha/year surplus and Tier 2 for farms that do not yet meet that standard but are working towards it. Tier 2 entrants may join with a higher phosphorus surplus provided they achieve a minimum 10% reduction over four years or reach the 10 kg P/ha/year target.

The Rivers Trust strongly emphasises that Tier 2 must be a transitional category, not a permanent management option. The proposed 10% reduction should be seen as an interim milestone rather than the end point. It is therefore essential that a clear and legally enforceable timeframe is established for Tier 2 farms to achieve the Tier 1 standard of no more than 10 kg P/ha/year surplus. The NAP Steering Group should be tasked with agreeing this timeframe, and it should be incorporated directly into the regulations so that farmers, regulators and other stakeholders have certainty regarding long-term expectations.

We are particularly concerned that farms operating at or above the 170 kg N/ha threshold could use Tier 2 as a means of delaying compliance with the Tier 1 phosphorus balance standard. Tier 2 should not become a route to maintain elevated nutrient surpluses indefinitely, nor should it facilitate further intensification while farms remain on a prolonged "journey" towards compliance. The NSP was designed to improve nutrient management and reduce environmental risk; its success should therefore be measured by the rate at which farms progress from Tier 2 to Tier 1, rather than by participation levels alone.

The Rivers Trust also considers that additional clarity is required regarding eligibility for Tier 2. To avoid creating incentives for further intensification, Tier 2 should be available only to farms already operating above the 170 kg N/ha threshold at an agreed baseline date. This would ensure that the NSP functions as intended, providing a regulated transition pathway for existing high-loading farms, rather than creating an opportunity for farms currently below the threshold to increase stocking rates and nutrient loading in order to access the scheme.

All NSP measures must be fully compatible with DAERA's legal obligations, including those arising under the Habitats Regulations. The regulations should therefore clearly define eligibility, progression requirements, review triggers and enforcement measures so that the NSP delivers genuine environmental improvement and contributes to the restoration of water quality across Northern Ireland.

Finally, The Rivers Trust welcomes the proposed name change from "Derogation" to "Nutrient Stewardship Programme" (NSP) and believes its significance should not be underestimated. The new terminology better reflects the programme's purpose of improving nutrient efficiency and environmental performance, moving the focus away from an exemption-based approach towards one of responsibility, stewardship and continuous improvement. By reframing participation as a commitment to better nutrient management rather than a permission to operate outside standard limits, the NSP has the potential to drive positive changes in mindset, behaviour and culture across the farming sector, supporting the wider objective of reducing nutrient losses and improving water quality.

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

Strongly agree

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

No further comments

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

Strongly Agree

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

The Rivers Trust supports the introduction of the proposed "Focused Approach" as an important complement to the regulatory measures contained within the NAP. We welcome the emphasis on providing additional advisory support, education and targeted recommendations in catchments and areas where water quality risks are greatest. The approach recognises that water quality challenges vary across Northern Ireland and that a more targeted, catchment-based approach can help ensure that interventions are directed where they will have the greatest environmental benefit.

Our support is informed by the success of our own Sustainable Catchment Programme (SCP), funded by DAERA, which has demonstrated that non-regulatory advice and farmer engagement can deliver meaningful environmental outcomes. Through targeted one-to-one support, farm visits, nutrient management advice and the funded implementation of practical measures to reduce diffuse and point source pollution, the programme has helped drive behavioural change towards more water-friendly farming practices. Importantly, monitoring undertaken by AFBI has shown measurable improvements in water quality indicators in a monitoring catchment in the Upper Bann River, where this approach has been implemented, providing strong evidence that advisory-led interventions can successfully complement regulation and accelerate environmental improvement.

The Rivers Trust therefore agrees that a focused, place-based approach should form part of the future NAP. However, its success will depend on adequate resourcing, robust monitoring and clear mechanisms for evaluating outcomes. The Focused Approach should not be viewed as an alternative to regulation, but as a vital tool for supporting farmers to adopt best practice, improve nutrient management and deliver lasting improvements in water quality in priority catchments across Northern Ireland.

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

Agree

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

The Rivers Trust supports the proposal to develop a Nutrient Efficiency Roadmap for Northern Ireland farming and welcomes the recognition that improving water quality will require a long-term, strategic approach to nutrient management beyond this, or any single NAP cycle. A clear roadmap will help farmers plan and adopt measures that improve nutrient use efficiency, reduce phosphorus and nitrogen surpluses, and make better use of both organic and inorganic nutrient sources. By providing a framework for innovation, advisory support and investment, the Roadmap will help drive sustained reductions in nutrient losses to the environment, addressing one of the root causes of poor water quality in Northern Ireland's rivers, loughs and estuaries. The Rivers Trust therefore considers this an important initiative that can support both farm resilience and the long-term recovery of Northern Ireland and transboundary aquatic ecosystems.

The Rivers Trust emphasises that the success of the Nutrient Efficiency Roadmap will depend on adequate long-term resourcing, with advisory support delivered in formats that are practical, trusted and accessible to farmers, including one-to-one advice, peer learning and demonstration farms, to ensure the measures are both understood and adopted effectively across the farming community.

Utilising Technology

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

Strongly agree

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

The Rivers Trust strongly agrees with the proposal to introduce an enhanced online system for recording and verifying slurry and manure imports and exports. Accurate recording and traceability of nutrient movements are fundamental to effective nutrient management and are essential if the NAP is to deliver genuine reductions in nutrient surpluses and improvements in water quality. We therefore support the proposal for additional reporting and verification requirements for slurry and manure movements, which we see as a critical step towards improving transparency, accountability and regulatory oversight.

In particular, this measure has a critical role to play in addressing the long-standing issue of so-called "paper acres" and the inaccurate or fraudulent reporting of slurry exports. The Rivers Trust is aware that concerns have existed for some time regarding declared slurry movements that may not reflect actual nutrient transfers on the ground. Where nutrients are reported as having been exported but remain on nutrient-surplus farms, the result is a significant risk that regulatory controls are undermined and phosphorus losses to waterways continue unchecked.

A robust digital reporting and verification system should provide DAERA with greater confidence in the accuracy of nutrient accounts, improve the ability to identify anomalies and

high-risk activities, and support more effective targeting of inspections and enforcement. This will help ensure that reported slurry and manure exports represent genuine nutrient redistribution rather than paper transactions, thereby strengthening the credibility and effectiveness of the wider NAP framework.

The Rivers Trust therefore considers this proposal to be a highly important and overdue measure that will improve nutrient management, support compliance, and contribute to reducing phosphorus pressures on Northern Ireland's rivers, loughs and coastal waters.

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

Strongly agree

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

No further comments

Additional Measures to Support Environmentally Sustainable Farming

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

Strongly agree

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

Our experience through the Sustainable Catchment Programme has demonstrated that trusted, farm-focused advice can be highly effective in driving behavioural change, improving understanding of environmental requirements and reducing pollution risks. By combining regulation with practical support and knowledge transfer, DAERA can help farmers implement and maintain good nutrient and slurry storage practices, reducing the risk of nutrient losses to waterways and delivering long-term improvements in water quality. To maximise effectiveness, however, this commitment must be backed by significant and sustained investment in advisory services. The Rivers Trust recommends that DAERA provides dedicated long-term and multi-annual funding for on-farm advice, training, demonstration projects and catchment-based engagement, ensuring that support is delivered at sufficient scale and in formats that are practical, accessible and trusted by the farming community. Without adequate resourcing, there is a risk that the potential benefits of this proposal will not be fully realised

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

Agree

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

The Rivers Trust agrees with the proposal to strengthen the regulatory framework governing the storage of silage bales in fields, recognising the importance of ensuring that best practice is consistently applied and that risks to water quality are minimised. While the temporary storage of silage bales in fields is often necessary for operational reasons,

inappropriate siting can increase the risk of silage effluent, nutrient losses and polluted runoff entering nearby watercourses, particularly during periods of heavy rainfall. The proposed changes will provide greater clarity for farmers, improve consistency in practice and help reduce the risk of pollution incidents. The Rivers Trust supports a balanced approach that combines clear regulatory requirements with practical guidance and advisory support, ensuring that silage bales are stored in locations that protect water quality while remaining workable for farm businesses. Strengthening these safeguards represents a proportionate and sensible measure to help prevent avoidable pollution and contribute to the wider objectives of the NAP.

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

Agree

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

The Rivers Trust agrees with the proposal to introduce voluntary, uncultivated buffer strips alongside waterways in arable fields. Buffer strips are a well-established measure for reducing the movement of sediment, phosphorus and other pollutants from agricultural land into rivers and streams by intercepting runoff, slowing overland flow and increasing opportunities for nutrient retention before pollutants reach the aquatic environment. As such, they can make an important contribution to improving water quality, particularly in catchments where diffuse agricultural pollution is a significant pressure.

However, the success of this proposal will depend entirely on achieving meaningful uptake by farmers. The Rivers Trust therefore emphasises that the scheme must be supported by adequate and sustained funding, together with targeted advisory support to ensure farmers understand both the environmental benefits and practical implementation requirements. Without appropriate incentives and guidance, uptake is likely to be limited, and the potential water quality benefits will not be realised. In addition, robust monitoring and evaluation will be required to assess participation rates and environmental outcomes, ensuring that the measure is delivering measurable reductions in sediment and phosphorus losses and contributing to the wider objectives of the NAP. Where monitoring indicates insufficient uptake or limited effectiveness, further action should be considered to ensure that the intended water quality improvements are achieved.

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

Strongly agree

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

The Rivers Trust agrees with the proposal to continue raising awareness of the benefits of liming on suitable land, recognising that maintaining optimum soil pH can improve nutrient use efficiency and help farmers make better use of existing soil nutrients. However, we welcome the decision not to proceed with the proposal in the May 2025 consultation for mandatory liming as a means of "mining" phosphorus from soils. A universal liming requirement would not have reflected the diversity of soils, catchments and environmental sensitivities across Northern Ireland and could have resulted in unintended changes to soil and water chemistry, with potential impacts on water-dependent habitats and species. The

Rivers Trust therefore supports the revised approach of promoting liming through advice and guidance, ensuring that decisions are based on soil testing, local conditions and environmental considerations rather than a blanket regulatory requirement.

Definition Updates & Technical Amendments

Q25 – Q30

Strongly agree - No further comments

Implementation - Including Inspections/Enforcement

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

Strongly agree

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

Accurate reporting is essential to the effective operation of the NAP, particularly in relation to nutrient accounting and the transfer of organic manures. Extending this duty will strengthen accountability, improve the integrity of compliance data and help deter fraudulent or misleading declarations. Given longstanding concerns regarding the accuracy of nutrient movement records, The Rivers Trust considers this a necessary and proportionate measure that will support more effective enforcement, increase confidence in the regulatory system and help ensure that nutrient management controls deliver real environmental benefits and improvements in water quality.

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

Strongly Agree

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

The Rivers Trust strongly agrees with the proposal to introduce a more targeted, risk-based approach to inspections, ensuring that regulatory effort is focused on the farms and activities that present the greatest risk to the environment. We support the principle that inspection regimes should be proportionate, efficient and evidence-led, with increased scrutiny directed towards higher-risk farms and activities where the potential for nutrient pollution is greatest. The proposed approach, including differentiated inspection rates for NSP Tier 1, Tier 2 and non-participating high-loading farms, represents a positive step towards improving environmental outcomes while making better use of regulatory resources.

However, the success of this approach will depend on DAERA and NIEA being adequately resourced to undertake the increased level of inspection, monitoring and enforcement envisaged within the NAP. A risk-based system can only be effective if sufficient resources are available to maintain a credible regulatory presence and ensure that non-compliance is identified and addressed.

The Rivers Trust also believes that greater transparency is required around compliance and enforcement. NIEA should be required to review and publish its inspection programme annually, including the proportion of inspections undertaken on a risk-based and random basis, compliance rates, enforcement actions taken and outcomes achieved. In addition, NIEA's enforcement policy should be publicly available and routinely reported against. We recommend that these reporting requirements are placed on a statutory footing so that farmers, stakeholders and the public can have confidence that the regulatory system is operating effectively, consistently and transparently. Public reporting of compliance and enforcement outcomes would improve accountability, support confidence in the NAP and help demonstrate whether the measures are delivering the intended water quality improvements.

Impact Assessments

Q33 – Q37

Agree - No further comments