

Sustainable Agriculture Policy Group Response to the NAP Consultation Northern Ireland Environment Link – June 2025

The Sustainable Agriculture Policy Group (SAP) of Northern Ireland Environment Link (NIEL) is a subgroup that recognises the importance of agriculture for delivering food and nature. The group seeks to ensure a sustainable future for the industry through sustainable food production and nature positive practices, funded through agri-environment and through returns in the market that account for the costs of production and maintenance of the environment.

SAP welcomes the opportunity to respond to the consultation on the Nutrient Action Programme (NAP). We strongly support the objective of improving water quality and addressing nutrient pollution from farming, recognising that farming is considered the most significant contributor to poor water quality in Northern Ireland.

However, we are concerned that the current proposals need to reflect the scale and complexity of the challenges facing Northern Ireland's farming system and provide a fair and coherent roadmap for transition. Whilst we don't share the agri-food sector's negative reaction to the consultation process and content. It is understandable that there is incompatibility of 'business as usual' and the NAP targets and the industry wishes to protect the 'status quo'. To address this, there needs to be a clear vision from Government that business as usual is not sustainable, and a vision of a different pathway for a diverse and profitable agriculture sector in Northern Ireland delivered in wider policy messaging.

In addition to the pro-forma response submitted by NIEL, we expand below on a number of these overarching issues from the perspective of our working group.

1. The Need for a Just and Differentiated Transition

The expansion of Northern Ireland's dairy industry is a good example of growth that has occurred under the direction of past DAERA policy, particularly 'Going for Growth' and with the backdrop of the removal of dairy quotas in 2015. Whilst we support our NI dairy industry, the current levels of inputs and outputs are no longer sustainable. High dependency on imported feed and phosphorus surpluses are symptoms of a system that has exceeded the environmental carrying capacity of the land. The policy response must acknowledge this trajectory, identify a 'sweet-spot' for lower input systems and commit to a just transition over at least 5–10 years, allowing both the industry and the land to adjust in a fair and supported way.

Whilst not categorically linked, there has been a pronounced correlation in the growth of agriculture and the decline of environmental indicators, resulting in an 'unbalanced scorecard' in terms of the annual statistics issued by DAERA on agriculture and the environment. See Appendix 1 for examples.

More generally, a twin-track policy approach for agriculture is essential to recognise the fundamental differences between the fewer larger, high-input farms and the more plentiful smaller, and often more biodiverse, family farms that do not appear to be as vocal or well-

represented in stakeholder negotiations despite their demographics (*79% of NI farms classed as 'very small' in DAERA's 2024 agricultural census*).

Whilst the NAP appears to target those larger and more productive farms, there is a risk that the blunt application of the wider suite of farming policies and initiatives focus too much on productivity and risk driving small farms out of business, consolidating land into larger units that may be less beneficial for biodiversity and community cohesion.

2. Policy Coherence and Strategic Roadmap

The consultation presents a set of proposals without a coherent policy direction. The legacy of 'Going for Growth' remains influential and the carbon emissions policies focus on increasing efficiency predicated on high production, which are generally incompatible with wider environmental goals.

There is an urgent need for a strategic roadmap that moves Northern Ireland beyond reactive environmental compliance when issues are flagged by the OEP and others, and toward a sustainable food and farming system. Whilst this long-term vision will be unwelcome from some areas of agri-business it will provide the certainty and vision to drive investment and behavioural change.

The consultation also **lacks adequate detail** on proposed measures and associated support, contributing to understandable resistance from industry. The hostile response from the agri-food sector reflects not just the content of the proposals but the **absence of trust** and insufficient clarity on implementation and funding. A more collaborative and transparent approach is required. The eNGO sector is willing to work with DAERA and agri-food in this space to look at a 'balanced scorecard' for NI farming where production is balanced with environmental outputs and other public goods.

3. Targeting Investment and Measure

The current emphasis on low emission slurry spreading equipment (LESSE) risks over-prioritising technological fixes. While LESSE is very effective in reducing ammonia emissions, it may not represent the best use of public funds, particularly for smaller farms or those with landscape constraints such that preclude the use of machinery. Timing of applications to avoid wet weather events, and nature-based solutions (NBS), including riparian buffers, cover crops, low-input grasslands, and multi-species swards are likely to provide a better return on investment by delivering co-benefits for biodiversity, water, and carbon. To be most effective, LESSE should be strategically targeted at intensive systems and areas of ammonia sensitivity.

Related to this, the proposal for slurry spreading distances of 30 miles may work on paper but are unrealistic in practice and will continue to be open to fraud and where these, or shorter, distances are feasible, will exacerbate competition for land, disadvantaging smaller farms for conacre and land rental.

Agri-environment schemes are currently underfunded and a key delivery mechanism for wider biodiversity improvements and farm profitability. But they cannot be viewed as a way to mitigate the externalities of intensive production and sustaining 'business-as-usual' pollution. A well-designed agri-environment programme should contribute positively to water quality through maintaining and enhancing priority habitats that are performing important ecosystem service roles on high nature value farms, whilst also providing habitat creation and nature-based solutions in more intensive systems alongside more sustainable production systems.

4. Market and Financial Considerations

The current agri-food system incentivises production efficiency and scale, driven largely by supermarket and processor demands. Farmers, particularly small and medium-sized, are being squeezed by conflicting pressures: environmental regulation on one side and commercial pressure for growth on the other. A transition to low-input, high-margin systems is both environmentally and economically viable, but requires better education, business planning support, and demonstration, as well as commercial returns for environmental goods. This 'profit centre' for environmental goods was much lauded by DAERA in the design phases of Farming with Nature but has recently been dropped and now risks undermining the success of this new scheme where farmers won't see the environment as part of their farming output.

In Great Britain, private investment is beginning to support biodiversity and clean water initiatives, but Northern Ireland remains heavily reliant on public subsidy. This dependency may be preventing innovation and limiting opportunities to unlock co-financing. The eNGO "Scale of Need" report <https://www.wildlifetrusts.org/sites/default/files/2024-07/Scale%20of%20Need%20Report%20July%202024%20FINAL.pdf> highlights the level of investment required in agriculture to deliver good environmental outcomes. Where the public purse cannot deliver this level of support, mechanisms need to be developed to leverage private finance.

5. Consultation Process and Dialogue

Many of the questions within the consultation offer binary choices, when the appropriate policy responses are more nuanced and site-specific. In several areas, there is insufficient evidence or clarity to make an informed judgment, but we remain committed to continued dialogue with the Department, industry, and wider stakeholders to achieve an urgent and coherent outcome to the challenges around agriculture and water quality.

We support the development of a co-design or stakeholder body with clear milestones, production of sound scientific evidence for actions, recognition of the differentiated interventions for different farm types, and mechanisms to review the impacts of NAP measures.

In parallel, DAERA should work with CAFRE to integrate whole-farm resilience planning, NBS education, and technical support/business analysis tools for low-input systems,

ensuring the next generation of farmers is equipped to meet both environmental and economic challenges.

Conclusion

The Sustainable Agriculture Policy Group supports the ambition of the NAP but believes the current consultation can be strengthened with a post-consultation process that has a clearer strategic vision, well evidenced science, better support for farms (particularly smaller farms), a more integrated policy outlook, and a commitment to delivering environmental outcomes through cost-effective, nature-positive solutions. The scale and urgency of action must now be matched by coherent planning and investment. Through NIEL as an umbrella body, the eNGO sector is keen to continue to work with DAERA and other stakeholders to deliver a better future for farming, water, and biodiversity in Northern Ireland.

Appendix 1 - DAERA's 'unbalanced scorecard' between agriculture and the environment

All data from DAERA agricultural census and business data and annual Environmental Statistics report

Dairy production has been steadily increasing, with concurrent increases in imported feed to sustain the increasing outputs per cow. Whilst efficiency gains mean less emissions per unit of output, overall sectoral emissions have been increasing and agricultural ammonia levels are also rising in Northern Ireland (whilst reducing in the rest of the UK).

The scale of investment in the NI environment is in decline as well as some key indicators of ecosystem health (of which there are limited datasets).

After a period of improvement, river phosphate levels are increasing again from a low of around 2014/2015.

Farmland bird indices have been in decline from 2010. Agri-environment investment peaked in 2013 and has decline ever since, with the replacement of CMSNI with EFS resulting in a step-change reduction in the level of support to farmers.

The area of land being designated as ASSI has effectively stalled since 2016 despite many more sites meeting the criteria.

