Ammonia Strategy Consultation High Level Report

April 2024

DRAFT AMMONIA STRATEGY FOR NORTHERN IRELAND HIGH LEVEL REPORT OF CONSULTATION RESPONSES

Question 1 - What are your views on the Northern Ireland wide 2030 targets outlined in the 3.1 Targets section?

Outcome

There were 343 responses to this question. Of the total, 31 responses were from organisations, 168 were from individuals, and 144 were from campaign response A.

Key themes

Targets should be more ambitious

• Ten organisations (7 environment focused, 1 rural focused, 1 Council, 1 political party/representative) and 2 individuals stated that the Northern Ireland wide 2030 targets outlined in the 3.1 Targets section should be more ambitious.

Supportive of the targets

• Three organisations (2 Councils, 1 AD focused) and 5 individuals were supportive of the targets.

Qualified support of the targets

 Two farming focused organisations and 1 individual were supportive of the targets while noting concerns.

More information and detail required

 Ten organisations (6 farming focused, 2 environment focused, 1 water focused, 1 Council) and 76 individuals sought more information and details on the Northern Ireland wide 2030 targets.

Significant financial concerns cited

Campaign response A and 50 individuals cited significant financial concerns.

Not supportive

• Six organisations (five farming focused 1 political party/representative) and 23 individuals were not supportive of the targets.

No comments

• Eleven individuals had no comment to make or felt they did have enough involvement in the detail to comment.

Question 2 - What are your views on the proposed pillars of the Ammonia Strategy?

Outcome

There were 347 responses to this question, of which 26 were from organisations, 177 were from individuals, and 144 were from campaign response A.

Key themes

Pillars should go further/suggestions made

Seven organisations (5 environment focused, 1 rural focused, 1 water focused) and two
individuals suggested the proposed pillars of the Ammonia Strategy should go further.

Supportive of the proposed pillars

• Five organisations (2 environment focused, 2 farming focused and 1 Council) and 4 individuals were supportive of the pillars.

More detail needed on measures, farm level impacts and full RIA

Eleven organisations (7 farming focused, 2 Councils, 1 environment focused and 1
political party/representative), campaign response A, and 153 individuals sought more
details on the proposed measures including the farm level impacts and a full Regulatory
Impact Assessment.

Not supportive of the proposed pillars

• One farming focused organisation and 15 individuals were not supportive of the pillars.

No comment on the proposed pillars

 One farming focused organisation, 1 Council, and 3 individuals had no comment to make on the proposed pillars.

Question 3 - What are your views on how DAERA will enable this strategy?

Outcome

There were 352 responses to this question, of which 28 were from organisations, 180 were from individuals, and 144 were from campaign response A.

Key themes

More urgency needed

• Five organisations (4 environment focused, 1 rural focused) sought more urgency in implementation and delivery of the strategy.

Qualified support

• Four organisations (2 Councils, 1 farming focused, 1 environment focused) and one individual had qualified support for how DAERA proposes to enable the strategy.

Need for a strategy budget/financial concerns cited

• Eight organisations (7 farming focused, 1 political party/representative) and 11 individuals cited financial concerns in relation to the strategy.

More information/clarification and alignment with other strategies sought

• Eight organisations (4 farming focused, 3 environment focused, 1 water focused) and 121 individuals sought further information and clarification and cited the need for alignment with other strategies.

Need for full RNIA, EQIA, consideration of LFAs

 A Council, campaign response A and 31 individuals stated the need for a full RNIA, EQIA, and consideration of LFAs.

Not supportive

Eleven individuals were not supportive of how DAERA proposes to enable the strategy.

No comment

• Two organisations (1 Council and 1 political party/representative) and 5 individuals had no comment to make on this question.

Question 4 - Do you have any comments on the proposals for low emission livestock housing?

Outcome

There were 352 responses to this question, of which 28 were from organisations, 180 were from individuals, and 144 were from campaign response A.

Key themes

Need for urgency

 Two environment focused organisations stated that proposals for low emission livestock housing should reflect the need for urgency, and that the option to make the measure mandatory be retained.

Support or qualified support

• Four organisations (2 environment focused, 1 political party/representative and 1 water focused) and 24 individuals were supportive of, or had qualified support of, the proposals.

Must be economically viable and supported

• Twelve organisations (7 farming focused, 3 Councils, 1 environment focused, 1 political party/representative), campaign response A, and 136 individuals stated the need for the proposals to be economically viable and supported.

More information/detail sought

Seven organisations (4 farming focused, 2 environment focused, 1 rural focused) and 7 individuals sought further information on the proposals.

Need for full RNIA, EQIA, consideration of LFAs

 Five individuals were supportive of how DAERA would enable the strategy but cited concerns relating to the Rural Needs Act 2016, the Human Rights Act 1998 and Equality duties under Section 75.

Not supportive

Four individuals were not supportive of the proposals.

No comment

• Three organisations (1 farming focused, 1 environment focused and 1 Council) and 4 individuals had no comments on the question.

Question 5 - Do you have any comments on the proposals for emerging technologies?

Outcome

There were 341 responses to this question, of which 30 were from organisations, 167 were from individuals, and 144 were from campaign response A.

Key themes

Need for urgency

• One environment focused organisation stated that the proposals are appropriate but must be introduced with an appropriate sense of urgency, based on best available science and practical research with new technologies introduced as they become available.

Supportive of the proposals

 Eight individuals were supportive of the investigation and the implementation of emerging technologies.

Financial support required

• Five individuals had the view that the proposal would require substantial finance and continued government support, and that few could justify the technologies financially.

Technologies must be proven and cost effective/ suggestions made

• Twenty-five organisations (13 farming focused, 6 environment focused, 3 Councils, 2 political parties/representatives, 1 water focused), campaign response A, and 139 individuals held the view that emerging technologies must be proven and cost effective.

The potential role for anaerobic digestion (AD)

• Two AD focussed organisations outlined the potential role for anaerobic digestion.

Not supportive

• Nine individuals were not supportive of emerging technologies.

No comment

• Two organisations (1 environment focused, 1 Council) and 6 individuals had no comment on this question.

Question 6 - Do you have any comments on the proposed additional progression point in the move towards LESSE adoption requiring slurry which is being exported between farms to be spread by LESSE from 1st January 2025?

Outcome

There were 321 responses to this question, of which 27 were from organisations, 150 were from individuals, and 144 were from campaign response A.

Key themes

Need for greater urgency

Four organisations (3 environment focused and 1 political party/representative) and 1 individual held the view that there should be greater urgency in the move to LESSE adoption.

Supportive of the proposal

• Three organisations (2 Councils,1 environment focused) and 62 individuals were supportive of the proposal that all slurry and digestate which is being exported from the farm/site of production should be spread by LESSE.

Qualified support

 Three organisations (2 environment focused, 1 farming focused) and 5 individuals were supportive of the proposals where the measure is appropriate, taking into consideration individual circumstances.

Further suggestions made or matters raised

• Four organisations (3 farming focused and 1 environment focused) and 3 individuals made further suggestions in relation to this proposal.

Concerns about impact on small farms

• Six organisations (4 farming focused, 1 Council and one political party/representative), campaign response A, and 38 individuals were concerned about the impact on small farms.

Financial concerns

Eleven individuals had financial concerns related to the additional costs arising as a result
of the proposal.

Not supportive of the proposal

 Three farming focused organisations and 14 individuals were not supportive of the proposal.

No comment

• Four organisations (2 farming focused, 1 environment focused,1 water focused) and 15 individuals had no comment to make on this question.

Question 7 - What are your views on the proposal to require all slurry to be spread by LESSE by 2026?

Outcome

There were 330 responses to this question, of which 26 were from organisations, 160 were from individuals, and 144 were from campaign response A.

Key themes

Need for greater urgency

• Four organisations (3 environment focused and one political party/representative) stated a need for greater urgency or ambition around this target.

Supportive of the proposal

• Three organisations (1 farming focused and 2 Councils) and 6 individuals agreed with the proposal.

Concerns about safe use of equipment and slurry residues in silage

• One farming focused organisation and 45 individuals cited concerns regarding safe use of equipment and slurry residues in silage.

Concerns about impact on small farmers and silage contamination

Campaign response A, a Council, and 33 individuals are concerned for small farmers
who may not be able to afford to buy such equipment and asked what the specific
proposals are to deliver grant aid to those farmers and farm contractors who want this
equipment but require financial support to purchase the machines.

Concerns about cost and funding of LESSE

 A farming focused organisation and 12 individuals cited concerns about the costs of this measure.

Concerns about impact on small farms

 A farmer focused organisation and 16 individuals had concerns about the impact of the proposal on small farms.

More information sought or suggestions made

 Five organisations (2 environment focused, 2 farming focused, 1 water focused) and 4 individuals sought more information or made further suggestions in relation to the proposal.

Support LESSE use with caveats

• Four organisations (2 environment focused and 2 farming focused) and 22 individuals responded to this question.

Opposed to or not supportive of the proposal

• Three farming focused organisations and 16 individuals are opposed to the proposal.

No comment

• Three organisations (1 farming focused, 1 environment focused, 1 Council) had no comment to make on the proposals or stated that it was not relevant to their sector.

Question 8 - Do you have any comments on the proposals to encourage implementation of longer grazing seasons?

Outcome

There were 334 responses to this question, of which 26 were from organisations, 164 were from individuals, and 144 were from campaign response A.

Key themes

Need for greater urgency

 One environment focused organisation stated that the proposals are appropriate but must be introduced with an appropriate sense of urgency, based on the best available science and practical research, and new technologies introduced as they become available.

Supportive of the proposals

• Three organisations (2 farming focused and 1 environmental focused) and 6 individuals were supportive of the proposal.

Grazing season determined by weather and ground conditions

 Seven organisations (four farming focused, 1 political party/organisation, 2 Councils), campaign response A, and 136 individuals stated that the length of grazing season is determined by weather and ground conditions.

Further suggestions made

• Fourteen organisations (6 environment focused, 5 farming focused, 1 political party/representative, 1 Council, 1 water focused) and 9 individuals made further suggestions in relation to this proposal.

Not supportive of the proposals

• Six individuals were not supportive of the proposal.

No comment

Eight individuals had no comment to make on this proposal.

Question 9 - Do you have any comments on how to reduce ammonia emissions from chemical fertiliser, including the potential introduction of a prohibition on the use of unprotected urea fertiliser?

Outcome

There were 320 responses to this question, of which 26 were from organisations, 150 were from individuals, and 144 were from campaign response A.

Key themes

Need for urgency

 An environment focused organisation stated that measures must be introduced with an appropriate sense of urgency, based on the best available science and practical research, and new technologies introduced as they become available.

Supportive of prohibition

• Six organisations (3 farming focused, 2 Councils and 1 political representative) and 63 individuals were supportive of prohibiting the use of unprotected urea fertiliser.

Support use of inhibitor, not supportive of a ban on unprotected urea

• Four organisations (1 environment focused, 1 farming focused, 1 political party/representative, 1 Council), campaign response A, and 31 individuals supported greater use of an inhibitor but did not support an all-out ban.

Concerns about costs and benefits

• Three farming focused organisations and 4 individuals cited concerns regarding the potential increase in fertiliser costs.

Concerns about shelf life

Five individuals cited concerns about the shelf life of protected urea.

More information needed/other proposals

• Six organisations (3 environment focused, 2 farming focused and 1 water focused) and 24 individuals sought more information on the proposal or made other proposals.

Not supportive of prohibition

• Six organisations (2 farming focused, 1 environment focused) along with 13 individuals were not supportive of this proposal.

No comment

 Three organisations (2 environment focused, 1 farming focused) and 10 individuals had no comments to make on this proposal.

Question 10 - Do you have any comments on the proposals to reduce crude protein levels in livestock diets?

Outcome

There were 347 responses to this question, of which 28 were from organisations, 175 were from individuals, and 144 were from campaign response A.

Key themes

Greater urgency required

 An environment focused organisation stated that measures must be introduced with an appropriate sense of urgency, based on the best available science and practical research, and new technologies introduced as they become available.

Supportive of the proposals

 Four organisations (1 farming focused, 1 environment focsued,1 Council and 1 political party/representative) and 8 individuals were supportive of proposals to reduce crude protein in livestock diets.

Qualified support

• Ten organisations (5 farming focused, 2 Environment focused, 2 Councils, 1 political party/representative) along with 6 individuals had qualified support for this measure.

Support if performance not affected

• Sixty-eight individuals supported this measure as long as there were no negative effects on animal growth rates and performance.

Uses processor's recommendation

• One farmer focused organisation, and 52 individuals stated that their feed is blended as per processors recommendations with no choice given.

Financial support required

- Campaign response A and 2 individuals stated that DAERA must recognise the importance of ensuring a balanced livestock diet that achieves acceptable productivity. This will require financial support to ensure farm business remain sustainable.
- Twenty-five individuals stated that financial support will be required to ensure farm businesses remain sustainable.

More information needed/other proposals

• Six organisations (3 environment focused, 3 farmer focused) and 5 individuals sought further information or made further proposals.

Not supportive

• Nine individuals were not supportive of this measure. Further detail from responses is summarised below.

No comment

• Four organisations (1 water focused, 1 environment focused, 1 farming focused, 1 Council) and two individuals had no comment to make in relation to this question.

Question 11 - What are your views on the proposals relating to improving feed efficiency through genetic improvement?

Outcome

There were 335 responses to this question, of which 27 were from organisations, 164 were from individuals, and 144 were from campaign response A.

Key themes

Need for greater urgency

 An environment focused organisation stated that measures must be introduced with an appropriate sense of urgency, based on the best available science and practical research, and new technologies introduced as they become available.

Supportive of the proposals

• Five organisations (3 farming focused, 1 Council, 1 political representative) and 24 individuals were supportive of proposals to improve feed efficiency through genetics.

Qualified support

 Nine organisations (7 farming focused, 2 environment focused), campaign response A, and 28 individuals were supportive of the proposal while making further comments and proposals.

Poultry producers do not select genetics

• Seventy-nine individuals stated that their poultry are provided, and they do not select the genetics.

Further information/research required

• Five organisations (3 environment focused,1 farming focused, 1 political party/ representative) and 11 individuals sought further information, including more on the provision of sufficient evidence for validation of measures.

Financial support required

• Four individuals were supportive of the proposals, as long as there was financial support for them.

Not supportive of the proposals

• Eight individuals were not supportive of the proposals. Two were not supportive of changing genetics, 1 felt it should be driven by industry and three provided no reason.

No comment/no firm views

 Seven organisations and 10 individuals had no comment or firm views on these proposals.

Question 12 - What are your views on the proposals to encourage tree plantations around livestock housing?

Outcome

There were 320 responses to this question, of which 28 were from organisations, 148 were from individuals, and 144 were from campaign response A.

Key themes

Need for greater urgency

• One environment focused organisation stated that there needs to be greater urgency based on the best available science and practical research.

Supportive of the proposals

• Four organisations (2 Councils, 1 farming focused, 1 rural focused), campaign response A, and 24 individuals were supportive of the proposals to encourage tree plantations around livestock housing.

Qualified support

• Eleven organisations (5 farming focused, 3 environment focused, 2 Councils, 1 water focused) and 86 individuals had qualified support for the proposals.

More detail/information sought

 Six organisations (4 environment focused, 1 farming focused, 1 political party/representative) and 6 individuals sought more detail and information on the proposals.

Not supportive of the proposals

• Five organisations (4 farming focused, 1 political party/representative) and 17 individuals were not supportive of the proposals.

Needs financial support

 Thirteen individuals cited the need for financial support for tree planting and loss of value to farmland.

No comment

• One farming focused organisation and 2 individuals had no comment to make in relation to the proposals.

Question 13 - What are your views on how to encourage the safe covering of existing above ground slurry stores and lagoons?

Outcome

There were 306 responses to this question, of which 30 were from organisations, 132 were from individuals, and 144 were from campaign response A.

Key themes

Measure should go further

• Four environment focused organisations and 2 individuals felt this measure should go further.

Supportive of the measure

• One farming focused organisation and 63 individuals were supportive of the measure.

Financial support required

 Two farming focused organisations and 29 individuals stated that the measure requires financial support.

Further considerations raised

• Fifteen organisations (5 farming focused, 3 environment focused, 3 Councils, 1 water focused, 1 political party/representative, 1 AD focused, 1 planning focused), campaign response A, and 19 individuals raised further considerations in relation to the proposals.

Not supportive of the measure

• Five organisations (4 farming focused, 1 political representative) along with 10 individuals were not supportive of the proposal.

No comment

Three organisations (1 environment focused, 1 council focused, 1 farmer focused) and 10 individuals had no comment in relation to this question.

Question 14 - What are your views on DAERA's plans to support ammonia reduction measures through Green Growth and future agricultural policy?

Outcome

There were 325 responses to this question, of which 28 were from organisations, 153 were from individuals, and 144 were from campaign response A.

Key themes

All policies must be joined up

• Nine organisations (6 environment focused, 3 farming focused,) and 1 individual cited the need for policies to be joined up.

Supportive of the plans

• A Council and 4 individuals were supportive of DAERA's plans.

More detail and information needed/suggestions made

 Eleven organisations (8 farming focused, 1 environment focused, 1 Council, 1 AD focused) and 60 individuals required more detail and information or made further suggestions.

Financial support needed

Three organisations (1 Council, 1 environment focused, 1 rural focused) and 39 individuals stated the need for financial support.

Not supportive of the plans

• Three organisations (1 Council, 1 farming focused, 1 political party/representative) campaign response A, and 41 individuals were not supportive of the plans.

No comment

Seven individuals had no comment to make on the plans.

Question 15 - What are your views on DAERA's plans for knowledge transfer and education on ammonia reduction?

Outcome

There were 300 responses to this question, of which 24 were from organisations, 132 were from individuals, and 144 were from campaign response A.

Key themes

Supportive of the plans

 Seven organisations (3 farming focused, 3 Councils, 1 environment focused) and 38 individuals were supportive of DAERA's plans for knowledge transfer and education on ammonia reduction.

Qualified support

• Fifteen organisations (8 farming focused, 5 environment focused, 1 AD focused, 1 water focused), campaign response A, and 70 individuals had qualified support for DAERA's plans for knowledge transfer and education on ammonia reduction.

Importance of research and science stated

• Six individual responses stated the importance of research and science-based evidence.

Funding focused response

 Six individual responses focused on funding; 5 of these responses did not support ammonia reduction measures being funded through a new future agriculture policy, and 1 sought clarity on funding and support.

Not supportive of the plans

• Seven individuals were not supportive of DAERA's plans for knowledge transfer and education on ammonia reduction.

No comment

• Two organisations (1 Council and 1 environment focused) and 5 individuals had no comment to make in response to the question.

Question 16 - What are your views on the proposals for spatially targeted measures around designated sites?

Outcome

there were 322 responses to this question, of which 28 were from organisations, 150 were from individuals, and 144 were from campaign response A.

Key themes

Proposed measures should go further

• Five environment focused organisations and one individual stated that the proposals for spatially targeted measures around designated sites should go further.

Supportive of the proposals

• An environment focused organisation and 1 individual expressed support of the proposals for spatially targeted measures around designated sites with no further comments.

Qualified support/further suggestions

 Six organisations (3 Council, 2 environment focused, 1 farming focused, 1 water focused) and 7 individuals had qualified support or made further suggestions on the proposals for spatially targeted measures around designated sites.

Further information sought and recommendations made

• Eight organisations (7 farming focused, 1 environment focused) and 91 individuals sought further information on the proposal or made recommendations.

Concerns about impact assessment and LFAs

• A Council, campaign response A, and 31 individuals cited substantial or significant concerns with the proposed spatially targeted measures having a negative financial impact on farms which are located in the specific areas.

Concerned about and/or opposed to the measures

• Five organisations (4 farming focused, 1 political representative) and 14 individuals expressed concerns about the impact of the proposed measures.

No comment

• Six individuals had no comment to make in relation to this question.

Question 17 - What are your views on the proposed conservation actions to restore habitats and support sustainable development?

Outcome

There were 304 responses to this question, of which 25 were from organisations, 135 were from individuals, and 144 were from campaign response A.

Key themes

Greater urgency required

 Three environment focused organisations cited the need for greater urgency in restoring habitats.

Supportive of the proposed actions

 Seven organisations (3 Councils, 2 environment focused, 1 farming focused, 1 water focused) and 12 individuals were supportive of proposed conservation actions to restore habitats and support sustainable development.

Further information sought and recommendations made

• Thirteen organisations (8 farming focused, 3 environment focused, 1 Council, 1 AD focused), campaign response A, and 113 individuals sought further information on the proposed conservation measures or made further suggestions.

Not supportive of the proposed actions

• One farming focused organisation and 6 individuals were not supportive of the measures.

No comment

• One farming focused organisation and 4 individuals had no comment on the proposals.

Question 18 - What are your views on the appropriate delivery and funding mechanisms to deliver habitat restoration?

Outcome

There were 321 responses to this question, of which 23 were from organisations, 154 were from individuals, and 144 were from campaign response A.

Key themes

Policies should go further

• An environment focused organisation and an individual made suggestions on how policies in this area should go further.

Supportive of habitat restoration

• Two Councils and 5 individuals were supportive of habitat restoration.

More information/detail required on the proposals

• Six organisations (4 farming focused, 2 environment focused), campaign response A, and 6 individuals sought more detail on the proposals.

Funding information sought on funding or suggestions made

• Ten organisations (5 environment focused, 4 farming focused, 1 water focused) and 132 individuals sought information on funding or made suggestions about funding.

Not supportive

Four individuals were not supportive of habitat restoration programmes.

No comment

• Three organisations (2 Councils, 1 farming focused) and 7 individuals had no comment to make in relation to the question.

Question 19 - Do you have any comments on what evidence or issues should be considered when assessing these impacts?

Outcome

There were 286 responses to this question, of which 23 were from organisations, 119 were from individuals, and 144 were from campaign response A.

Key themes

Need for a clear assessment process

• Four organisations (2 environment focused, 2 farming focused) and 73 individuals responded with concerns including the need for a clear assessment process.

Further considerations raised

 Fourteen organisations (6 farming focused, 4 environment focused, 3 Councils, 1 water focused) and 15 individuals raised further considerations.

Concerns regarding impact assessments

• Three organisations (2 farming focused, 1 environment focused), campaign response A, and 11 individuals had concerns regarding specific impact assessments.

Funding needed

A farming focused organisation and seven individuals stated the need for funding.

Not supportive

 Two individuals were not supportive; one stated that land is for food production, and this should be maximised and supported; and another stated that this was a waste of farmers time and energy.

No comment

One Council and 12 individuals had no comment to make in relation to the question.

Question 20 - What are your views on how DAERA should work with stakeholders to inform the direction and delivery of the strategy, and the detail of the various measures?

Outcome

There were 299 responses to this question, of which 25 were from organisations, 130 were from individuals, and 144 were from campaign response A.

Key themes

Supportive of stakeholder engagement

• Eighteen organisations (9 farming focused, 4 environment focused, 3 Councils, 1 water focused, 1 rural focused) and 99 individuals were supportive of stakeholder engagement.

Feedback provided on stakeholder engagement

• Five organisations (3 farmer focused, 2 environment focused) and 12 individuals had concerns provided feedback on stakeholder engagement.

EQIA concerns stated

• Campaign response A and 9 individuals stated that DAERA should act in partnership with farmers. Equality Commission in their advice to public authorities encourage 'Early, ongoing and meaningful engagement with those directly affected by a proposed policy'. It is clear from DAERA's assessment this has not happened.

Other suggestions made

• One environment focused organisation and 4 individuals made other suggestions in relation to stakeholder engagement.

No comment

• A Council and 6 individuals had no comment to make in relation to the question.

Question 21 - Do you have any other comments or contributions on this document?

Outcome

There were 517 responses to this question, of which 31 were from organisations, 171 were from individuals, 144 were from campaign response A, and 171 were from campaign response B.

Key themes

Strategy should go further

 Two organisations (1 environmental, 1 political) campaign response B and 1 individual responded that the strategy should go further.

Supportive of the strategy

• Three individuals were supportive of the measures to reduce ammonia emissions

Further information sought or suggestions made

• Twenty-eight organisations (11 farming focused, 7 environment focused, 3 Councils, 2 planning focused, 2 AD focused, 1 political party/ representative, 1 water focused, 1 rural focused), campaign response A, and 143 individuals cited a range of concerns relating to more detail required on the proposed measures and targets.

Concerns related to food security

Seven individuals stated concerns related to food security and self-sufficiency.

Not supportive

• Nine individuals were not supportive of the measures and targets in the draft strategy and raised a number of areas.

No comment

A Council and 8 individuals had no comment to make in relation to the question.