

# COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

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Dr Fiona Wilson  
Department of Environment  
Water Framework Team  
Planning and Natural Resources Division  
Calvert House  
23 Castle Place  
Belfast  
BT1 1FY

Dear Dr Wilson

## **Consultation Paper on the Nitrates Action Programme Regulations (Northern Ireland) 2010**

Thank you for the opportunity to comment on this consultation and CNCC has the following points to make on the Nitrates Action Programme Regulations (NI) 2010.

With eutrophication remaining as a significant problem with water quality, further efforts to reduce nutrient input from agriculture are welcomed.

However, we do have concerns over the proposals to change the steeply sloping ground criteria. Given that these are a proxy for taking account of factors such as proximity to waterways, soil condition, ground cover and rainfall, there is potential to significantly disadvantage farmers with steep land where no significant risk of impact on water quality exists. We also wonder about the practicalities for both farmer and inspector of assessing field slope and suggest that a GIS solution should be sought in the long term, with a view to providing farms with a map showing areas unsuitable for nutrient application.

Farmers sometimes come under pressure from contractors to spread slurry when conditions are not suitable. We welcome the extension of "the appropriate person" to include individuals permitted by the controller to carry out, on their behalf, activities described in the Regulations, as it would mean that contractors could be held directly responsible for any pollution they caused.

Yours sincerely



**PATRICK CASEMENT  
CHAIRMAN**