

Submitted to Consultation on the Strategic Environmental Assessment – Environmental Report for the combined Proposed Ammonia Strategy and Revised Operational Protocol  
Submitted on 2025-05-21 17:15:27

## Introduction

1 What is your name?

Name:  
Peter McEvoy

2 What is your email address?

Email:  
peter.mcevoy@ulsterwildlife.org

3 On what basis are you responding?

Non Government Organisation

Other:

4 Do you have any comments or feedback on the Environmental Report Non-technical Summary?

Please enter comments in box below:

5 Do you have any comments or feedback on chapter 1 of the Environmental Report?

Please enter comments in box below:

General Response to SEA Chapters 1–3 – Context and Process

Ulster Wildlife welcomes the structure and scope of the Strategic Environmental Assessment and supports the use of best available scientific evidence and international policy frameworks in its development. We recognise that Chapters 1 to 3 provide the necessary context, legal basis, and methodological framework for assessing the environmental implications of the Proposed Ammonia Strategy and Revised Operational Protocol. We are pleased to see alignment with the Environmental Assessment of Plans and Programmes Regulations (NI) 2004 and the integration of stakeholder consultation, policy mapping, and risk assessment methodologies throughout the SEA process. The inclusion of Strategic Environmental Objectives across a wide range of themes (biodiversity, air, water, soils, etc.) is welcome, and we support the use of matrix assessments to inform policy decisions.

6 Do you have any comments or feedback on chapter 2 of the Environmental Report?

Please enter comments in box below:

General Response to SEA Chapters 1–3 – Context and Process

Ulster Wildlife welcomes the structure and scope of the Strategic Environmental Assessment and supports the use of best available scientific evidence and international policy frameworks in its development. We recognise that Chapters 1 to 3 provide the necessary context, legal basis, and methodological framework for assessing the environmental implications of the Proposed Ammonia Strategy and Revised Operational Protocol. We are pleased to see alignment with the Environmental Assessment of Plans and Programmes Regulations (NI) 2004 and the integration of stakeholder consultation, policy mapping, and risk assessment methodologies throughout the SEA process. The inclusion of Strategic Environmental Objectives across a wide range of themes (biodiversity, air, water, soils, etc.) is welcome, and we support the use of matrix assessments to inform policy decisions.

7 Do you have any comments or feedback on chapter 3 of the Environmental Report?

Please enter comments in box below:

General Response to SEA Chapters 1–3 – Context and Process

Ulster Wildlife welcomes the structure and scope of the Strategic Environmental Assessment and supports the use of best available scientific evidence and international policy frameworks in its development. We recognise that Chapters 1 to 3 provide the necessary context, legal basis, and methodological framework for assessing the environmental implications of the Proposed Ammonia Strategy and Revised Operational Protocol. We are pleased to see alignment with the Environmental Assessment of Plans and Programmes Regulations (NI) 2004 and the integration of stakeholder consultation, policy mapping, and risk assessment methodologies throughout the SEA process. The inclusion of Strategic Environmental Objectives across a wide range of themes (biodiversity, air, water, soils, etc.) is welcome, and we support the use of matrix assessments to inform policy decisions.

8 Do you have any comments or feedback on chapter 4 of the Environmental Report?

Please enter comments in box below:

Chapter 4 – Biodiversity, Flora and Fauna

As a wildlife charity, Ulster Wildlife strongly supports the SEA's emphasis on biodiversity loss driven by ammonia emissions, noting that almost half

(48.5%) of designated site features (excluding earth science features) are in unfavourable condition and an alarming 98% of Northern Ireland's priority habitats are experiencing nitrogen deposition rates exceeding critical loads.

We particularly welcome the Site Nitrogen Action Plans (SNAPs) approach, which offers a practical, site-specific mechanism for working with surrounding land-use and occupants to reduce overall ammonia and protect high-value habitats. We urge DAERA to ensure SNAPs are comprehensively supported with facilitation, funding, and alignment with broader habitat restoration targets under 30x30 and the Nature Recovery Strategy. Their successful implementation will require long-term investment in both nature-based solutions (e.g. wetland buffers, woodland planting), capital measures for businesses and farm-level advisory support.

#### 9 Do you have any comments or feedback on chapter 5 of the Environmental Report?

Please enter comments in box below:

##### Chapter 5 – Water

We welcome the SEA's clear recognition of ammonia's role in worsening water quality, particularly through its interaction with phosphorus pollution. The Lough Neagh crisis is a stark reminder of the need to tackle both diffuse and point-source nutrient losses - which also threaten most lowland water bodies. Slurry dewatering, increasingly promoted for phosphorus control, can reduce runoff risks but may lead to higher ammonia emissions from concentrated solids and digestate, particularly when transported to anaerobic digestion (AD) plants or stored without adequate covers. This highlights the importance of joined-up policy: tackling water pollution must not undermine air quality objectives, but due to the importance of reducing phosphorous into water courses, there must be pragmatic solutions to removing barriers and upscaling the dewatering and AD processes. As a positive, the centralisation of the solid waste and digestate transfers the issues from diffuse to a point source issue, which may be easier to monitor and mitigate, but may require a regulatory framework that ensures best available techniques and ammonia capture are standard practice.

#### 10 Do you have any comments or feedback on chapter 6 of the Environmental Report?

Please enter comments in box below:

##### Chapter 6 – Air

The SEA highlights that Northern Ireland is an outlier in the UK, with ammonia emissions rising here while declining elsewhere. This not only endangers biodiversity but also significantly affects human health. Ulster Wildlife urges stronger emphasis on the role of ammonia in the formation of fine particulate matter (PM2.5), a major health risk. Evidence shows that ammonia contributes to secondary PM2.5 formation through reactions with other air pollutants, posing cardiovascular and respiratory issues. The Revised Protocol must be seen not just as an environmental tool but as a public health imperative. There is a strong case for more widespread air quality monitoring across rural areas to quantify exposure levels.

We support the polluter pays principle but also recognise that responsibility lies across the food system — not solely with farmers. The ultimate polluters are the retailers and consumers, whose expectation of cheap, high-volume animal protein drives intensification. Policy must recognise this and ensure a fair transition for farmers through adequate funding and supply chain reform.

#### 11 Do you have any comments or feedback on chapter 7 of the Environmental Report?

Comments section:

##### Chapter 7 – Material Assets

We agree that ammonia pollution undermines key natural assets like peatlands, soils, and ancient woodlands. These habitats are not just biodiversity hotspots but provide vital ecosystem services including carbon storage, water regulation, and flood resilience. We support prioritised restoration in areas most affected by ammonia and see a strong role for SNAPs in targeting these interventions. Investment in nature-based solutions at the landscape scale can unlock multiple benefits and build resilience across farming and nature sectors.

Ulster Wildlife recognises that agricultural land and associated infrastructure are key material assets. We support public investment in capital infrastructure improvements, particularly where this replaces outdated facilities with low-emission alternatives (e.g. sealed slurry stores, low-emission housing). However, we do not support expansion of enterprises where this would increase overall emissions, especially near designated sites. Infrastructure funding must be aligned with emission reduction, biodiversity recovery, and land use planning objectives to ensure environmental gains are not undermined by unregulated expansion.

#### 12 Do you have any comments or feedback on chapter 8 of the Environmental Report?

Please enter comments in box below:

#### 13 Do you have any comments or feedback on chapter 9 of the Environmental Report?

Please enter comments in box below:

#### 14 Do you have any comments, feedback, or additional evidence to present on the Environmental Report?

Please enter comments in box below:

#### 15 Do you have any comments or feedback on the Proposed Ammonia Strategy?

Comments :

##### Response to the Update on the Proposed Ammonia Strategy

The Proposed Ammonia Strategy reflects a necessary shift towards joined-up, science-based environmental policy. We support the tiered approach combining mandatory national measures, voluntary on-farm improvements, and spatially targeted interventions at sensitive sites through SNAPs. However, the level of ambition must match the urgency of the problem. With every SAC and ASSI currently exceeding ammonia critical levels, and PM2.5

pollution posing major health risks, delay is no longer acceptable.

Nature-based solutions, technological innovation, and farmer support must all be scaled up. The polluter pays principle should guide cost-sharing, with consumers and supply chains part of the solution. Public investment in environmental goods is a key policy ask, and implementation should be transparent, enforceable, and monitored.

16 Do you have any comments, feedback or additional evidence to present on the Revised Operational Protocol?

Comments:

Response to the Revised Operational Protocol

Ulster Wildlife supports the Revised Operational Protocol as an overdue improvement to defining how planning and permitting decisions account for air pollution impacts. The updated thresholds based on the latest evidence, and the structured assessment process involving De-Minimis and Site-Relevant Thresholds, offer scientific rigour and practical flexibility. However, we believe the most important addition is the role of SNAPs — Site Nitrogen Action Plans — which are essential for site-level action and should be rolled out urgently.

The effectiveness of the protocol will depend on its effective implementation, particularly with the ongoing planning stalemate on many agricultural applications. The absence of planning decisions, or a clear framework to assess ammonia impacts, is harming both environmental protection and farming businesses seeking to invest in better infrastructure. We would like to see a functioning planning regime that can balance economic and environmental interests.

17 Do you have any other comments, feedback or additional evidence to provide on the impact assessments in this consultation?

comments: