Rialtas na hÉireann
Government of Ireland

Draft **Sixth Nitrates Action Programme**

2026 - 2029

Prepared by the Department of
Housing, Local Government and Heritage
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1 Introduction

Ireland's Nitrates Action Programme (NAP) gives effect to the requirements of the Nitrates Directive (Council Directive 91/676/EEC)[1]. Its purpose is to prevent pollution of surface waters and groundwater from agricultural nutrients, and to protect and improve water quality. The Minister for Housing, Local Government and Heritage is responsible for publishing the NAP, in consultation with the Minister for Agriculture, Food and the Marine. The Nitrates Directive requires Member States to develop a NAP every four years, and this document sets out Ireland's draft Sixth NAP 2026 - 2029. The first NAP was published as the European Union (Good Agricultural Practice for the Protection of Waters) Regulations ('The GAP Regulations') in 2006, with subsequent NAPs published in 2010, 2013, 2017 and 2022.

In developing the draft Sixth NAP for public consultation, the Ministers sought scientific advice from the Nitrates Expert Group (NEG). The Department of Housing, Local Government and Heritage (DHLGH) and the Department of Agriculture, Food and the Marine (DAFM) co-chair the group, which comprises senior scientific experts from DHLGH, DAFM, the Environmental Protection Agency (EPA) and Teagasc. In addition, DAFM facilitated engagement with farming organisations and agri-industry through the Agriculture Water Quality Working Group[2].

1.1 Ireland's Nitrates Action Programme

The Nitrates Directive (91/676/EEC) is a protective (basic) measure under the Water Framework Directive (WFD) and aims to reduce water pollution caused or induced by nitrates from agricultural sources. Although not required by the Directive, Ireland includes phosphorus in the Nitrates Action Programme, as phosphorus is a key limiting nutrient in many of our surface waters, particularly in areas with poorly draining soils.

[1] https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1561542776070&uri=CELEX:01991L0676-20081211

[2] https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/press-releases/agriculture-water-quality-working-group-meets/

The Nitrates Directive places a number of obligations on Member States, and Table 1 sets out the Nitrates Directive requirements, with a summary of how Ireland complies with them.

Table 1 Nitrates Directive requirements

Nitrates Directive Requirement	How is this addressed?
Develop and implement an action programme to reduce and prevent pollution from agriculture, and review and update on a four-year cycle.	• This document sets out the detail of the draft Sixth NAP 2026 – 2029. Five NAPs have been implemented to date. • The NAP is a basic measure under the WFD. The Water Action Plan 2024 (Ireland's Third Cycle River Basin Management Plan) cites the NAP and additional or supplementary agricultural measures to achieve WFD environmental objectives where agriculture is a pressure.
Identify waters that are polluted or are liable to pollution by nitrates from agriculture.	EPA report series: • EPA Nitrates Directive Article 10 report (latest 2020 – 2023)[3] • EPA Water quality monitoring report on nitrogen and phosphorus concentrations in Irish waters (2024[4]) • EPA Water quality in Ireland report (2019 - 2024[5])

[3] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/Nitrates-Article-10-Report-for-Ireland-2020-2023.pdf

[4] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/water-quality-monitoring-report-on-nitrogen-and-phosphorus-concentrations-in-irish-waters-2024.php

[5] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/

Nitrates Directive Requirement	How is this addressed?
	• EPA Evidence-based targeting of agricultural measures to reduce nitrogen in catchments to achieve water quality objectives (2025[6]) • EPA Early insights indicator report: Nitrogen concentrations in selected major rivers (2024[7]) and (January – June 2025[8]) • EPA characterisation and the 'Farm and Landscape measures for Agriculture' (FLAG) map[9]
Identify the area or areas to which an action programme should be applied to protect water from pollution from nitrates from agricultural sources, known as Nitrates Vulnerable Zones.	• Ireland takes a whole-of-territory approach in relation to Nitrates Vulnerable Zones in its NAP (compared to an EU average of 45% territorial coverage).

[6] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/evidence-based-targeting-of-agricultural-measures-to-reduce-nitrogen-in-catchments-to-achieve-water-quality-objectives.php

[7] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/early-insights-indicator-report-nitrogen-concentrations-in-selected-major-rivers-january-december-2024.php

[8] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/early-insights-indicator-report-nitrogen-concentrations-in-selected-major-rivers-january-june-2025.php

[9] https://gis.epa.ie/EPAMaps/agriculture

Nitrates Directive Requirement	How is this addressed?
Establish codes of Good Agricultural Practice.	• NAP established on a statutory basis through the European Union (Good Agricultural Practice for the Protection of Waters) Regulations.
Monitor the effectiveness of the action programme and any unforeseen impacts.	EPA report series: • EPA Nitrates Directive Article 10 report (2020 – 2023) • EPA Water quality monitoring report on nitrogen and phosphorus concentrations in Irish waters (2024) • EPA Water quality in Ireland report (2019 – 2024) • EPA Evidence-based targeting of agricultural measures to reduce nitrogen in catchments to achieve water quality objectives (2025) • EPA Early insights indicator report: Nitrogen concentrations in selected major rivers (2024) and (January – June 2025) • EPA characterisation and the Farm and Landscape measures for Agriculture (FLAG) map • And the Teagasc Agricultural Catchments Programme[10]

[10] https://teagasc.ie/environment/water-quality/agricultural-catchments/

Nitrates Directive Requirement	How is this addressed?
Ensure compliance and enforcement.	• National Agricultural Inspection Programme (NAIP) established under the Fifth NAP[11] • Additional inspections undertaken under the GAP Regulations on behalf of local authorities by DAFM • DAFM derogation inspections • DAFM CAP Strategic Plan Conditionality On-Farm Inspections and 100% administration checks
Report to the EU Commission on progress.	• EPA Nitrates Directive Article 10 report (2020 – 2023)

[11] https://www.epa.ie/our-services/compliance--enforcement/support-and-supervision-of-local-authorities/national-agricultural-inspection-programme-naip/

1.1.1 Regulatory and Non-Regulatory Approaches

Ireland uses a combination of regulatory and non-regulatory approaches to the implementation of measures under the Nitrates Action Programme. Regulations are necessary to set limits, ensure good practice and allow for compliance assessment and enforcement. The regulatory measures in the NAP are implemented through the European Union (Good Agricultural Practice for the Protection of Waters) Regulations, which reflect the cumulative measures implemented and amended since the first NAP in 2006. These are commonly known as the GAP Regulations and include regulations to address the requirements set out in Annex III of the Nitrates Directive. New regulations will be put in place to implement the Sixth NAP and the previous regulations will be revoked.

Non-regulatory measures can also play a significant role in the protection of water quality from agricultural nutrients, as it is sometimes not possible to adequately target regulations at field level due to the evidence-base not being sufficiently robust at this scale. However, scientific tools such as the EPA Pollution Impact Potential (PIP) maps are powerful signposting tools to support targeting of non-regulatory measures. The draft Sixth NAP therefore, also includes a number of non-regulatory measures, supported by financial incentives and free advice, to encourage farmers to undertake targeted actions at field level.

The Nitrates Directive sets a limit of 170 kg of manure nitrogen per hectare (kg N/ha) however Annex III permits Member States to set a higher rate, based on a number of criteria and subject to approval by the European Commission and Member States, with the maximum rate approved by the Commission of 250 kg manure N/ha. This is commonly known as the Nitrates Derogation. Ireland sought and was permitted this derogation in all five previous programmes and is seeking to renew the derogation under the Sixth NAP. The Fifth NAP underwent an interim review as well as a two-year water quality review as part of the conditionality attached to the 2022-2025 Nitrates Derogation. Following those reviews, in line with scientific evidence provided by the EPA, a reduction to 220 kgN/ha was applied for most derogation farms[12]. In

[12] https://assets.gov.ie/static/documents/MaximumNitratesDerogationStockingRateLimitsMap20252000325.pdf

seeking the derogation, Ireland is required to present to the European Commission Nitrates Committee three times, agreeing the approach with the Commission before they will allow it to move forward and table a vote with the Member States. If permitted, the Commission then issues an implementing decision on the derogation, which is transposed into the GAP Regulations as an amendment. DAFM is responsible for the derogation, supported by DHLGH, and the Minister for Agriculture, Food and the Marine is responsible for approving individual derogations.

The European Commission launched an evaluation of the Nitrates Directive in December 2023, which is ongoing, and Ireland will continue to engage with that process and review the GAP Regulations in line with the outcome of that evaluation, as may be required.

1.2 Water Framework Directive

The Water Framework Directive (WFD)[13] was adopted by Member States in the year 2000, and is transposed into law in Ireland through the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003), as amended. It requires an integrated and harmonised approach to water policy, protection and management across Europe. Under the WFD, all waters (rivers, lakes, groundwater, estuaries, coastal waters, canals and reservoirs) are protected and measures must be put in place to ensure quality of these waters is restored to at least 'good' status or good potential (with some exceptions) by 2027 at the latest. The WFD applies to all activities that may have an impact on this objective or on the quality or quantity of water. The WFD requires an integrated approach to water protection and restoration across all policy sectors, and requires that a River Basin Management Plan (RBMP) is published to set out the measures necessary to protect and improve the quality of our waters. Ireland's third cycle RBMP is published as the Water Action Plan 2024[14]. The Nitrates Directive forms an integral part of the WFD as a basic measure in Article 11 and is the key legislative instrument in the protection of waters against agricultural nitrogen.

[13] https://environment.ec.europa.eu/topics/water/water-framework-directive_en

[14] https://assets.gov.ie/static/documents/water-action-plan-2024.pdf

Furthermore, the WFD is linked to, and reinforces, other EU environmental directives including directives relating to the protection of biodiversity (the Birds and Habitats Directives), daughter directives related to specific uses of waters (drinking water, bathing waters, shellfish waters and urban wastewater directives) and to directives concerned with the regulation of activities undertaken in the environment (Industrial Emissions and Environmental Impact Assessment directives).

1.3 Agriculture and Water Quality in Ireland

Access to clean water is essential to our health & wellbeing, our communities, our economy and our ecosystems. Our rivers, lakes and groundwater are our drinking water sources; clean water supports agriculture, industry and other key economic areas such as tourism and recreation; clean water supports numerous species and habitats, and our rivers and lakes are central features of many of our communities.

Agriculture is the most common land use in Ireland, accounting for almost 70% of the land area, and consequently has been identified as the most prevalent pressure on water quality, impacting over 1,000 water bodies[15]. In two thirds of water bodies where agriculture is a significant pressure, additional pressures have also been identified. The most common water quality issue arising from agriculture is the loss of nutrients to water, namely phosphorus and nitrogen, from both organic and inorganic sources. While both nutrients can contribute to eutrophication, controlling phosphorus levels is particularly important in our rivers and lakes whereas managing nitrogen is more critical to our groundwater, estuaries and coastal waters.

1.4 Water quality monitoring

To ensure compliance with the WFD, Ireland's national Water Quality Monitoring Programme provides an overview of the ecological and chemical status of surface waters (rivers, lakes, transitional and coastal waters) and the quantitative and chemical status of groundwater. It was established to meet the monitoring requirements under Article 8 of the WFD but also to ensure it supported the monitoring requirements of other water related legislation, such as the Nitrates

[15] https://www.catchments.ie/significant-pressures-agriculture/

Directive. The current water quality monitoring programme covers the period 2022 to 2027[16], which aligns with the third River Basin Management Plan for Ireland (Water Action Plan 2024), and represents 60% of the total number of water bodies nationally (2,429 river water bodies, 224 lakes, 80 transitional water bodies, 45 coastal waters, 16 canals and 121 groundwater bodies).

The latest Water Quality in Ireland report (2019 - 2024), published in October 2025, is based on the assessment of over 4000 surface water bodies and 514 groundwater bodies through monitoring or extrapolation[17,18]. The report highlighted that 52% of surface water bodies are at good or better ecological status, a decline from 54% in the preceding reporting period. For groundwater, 92% are in good chemical status, a slight improvement from 91% in the previous report. Transitional waters, which includes estuaries and coastal lagoons, are in the poorest condition, with 70% unsatisfactory. The report highlights that there have been improvements in phosphorus levels in priority areas for action, and reductions in nitrogen were detected in a number of rivers, but more needs to be done, as many improvements are being offset by declines elsewhere. Nevertheless, the levels of nutrients detected in waters has declined, which should in time lead to a positive ecological response, and the report demonstrates that improvements can be achieved where positive, targeted action is taken.

Nitrates Directive Article 10 Report

Ireland is required to produce a report every four years in accordance with the requirements of Article 10 of the Nitrates Directive[19]. This report is prepared by the EPA, with assistance from DHLGH, DAFM and Teagasc, and is required to contain:

1. A statement of the preventive action taken pursuant to Article 4.
2. A map showing the following:

[16] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/irelands-national-water-quality-monitoring-programme-20222027.php

[17] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/

[18] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/Appendix-A---Unmonitored-river-status-methodology-2016-2021.pdf

[19] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/Nitrates-Article-10-Report-for-Ireland-2020-2023.pdf

(a) waters identified in accordance with Article 3(1) and Annex I indicating for each water which of the criteria in Annex I was used for the purpose of identification;

(b) the location of the designated vulnerable zones, distinguishing between existing zones and zones designated since the previous report.

3. A summary of the monitoring results obtained pursuant to Article 6 of the Nitrates Directive, including a statement of the considerations that led to the designation of each vulnerable zone and to any revision of, or addition to, designations of vulnerable zones.
4. A summary of the action programme.

In compiling the report, Ireland uses data from the national Water Quality Monitoring Programme to satisfy the reporting requirements of Article 10. The most recent report covers the seventh reporting period from 2020 – 2023, and indicated nitrate concentrations in groundwater, riverine and transitional waters have increased since the sixth reporting period, based on the four-year average over the reporting period, with evidence of eutrophication in the south east, in particular the River Suir catchment. Eight of the 63 transitional waters were eutrophic, with a further 33 designated as “could become eutrophic”. These were mainly in the south east and along the southern seaboard, which had six of the eight transitional waters. The nitrate concentrations are still amongst the lowest in Europe, however nitrate levels fluctuate year to year, with a reduction detected in 2024 offset by an increase detected in the ‘EPA Early insights indicator report: Nitrogen concentrations in selected major rivers, January – June 2025’. These fluctuations are due to source loading, agricultural land management and weather patterns, and the EPA is investigating the drivers over time.

1.4.1 The EPA's assessment of the catchments that need reductions in nitrogen concentrations to achieve water quality objectives

The EPA report, "Evidence-based targeting of agricultural measures to reduce nitrogen in catchments to achieve water quality objectives 2020 – 2024"[20] was published in August 2025. It provides three inter-related updates to the evidence base to support the Water Action Plan 2024 approach of "the right measures in the right place" as follows:

i. an assessment of the catchments that require nitrogen reductions;
ii. an assessment of the changes in the nitrate distances-to-target since 1990 for these representative catchments; and
iii. the Farm and Landscape measures for Agriculture (FLAG) map, (formerly known as the Targeting Agricultural Measures map), has been updated to indicate where agricultural measures should be targeted to restore water quality.

In undertaking the assessment of catchments that require nitrogen reductions, the EPA assessed 20 representative catchments. The results of the assessment indicate that nitrogen losses in our catchments have decreased in recent years and consequently, the amount of nitrogen that must be reduced to meet ecological targets has also declined across all but one location, (the Blackwater catchment), compared to the previous assessment based on the 2017–2019 reporting period.

Based on data from 2022–2024, seven of the 20 catchments still require nitrogen reductions, ranging from 2% to 38%, with the highest reductions needed in the Barrow, followed by the Slaney. The five other catchments needing nitrogen reductions are the Bandon, Blackwater, Boyne, Nore and Suir catchments. These are referred to as the Catchments of Concern[21].

[20] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/evidence-based-targeting-of-agricultural-measures-to-reduce-nitrogen-in-catchments-to-achieve-water-quality-objectives.php

[21] A number of catchments have been identified as catchments of concern due to elevated nitrogen concentrations: https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/evidence-based-targeting-of-agricultural-measures-to-reduce-nitrogen-in-catchments-to-achieve-water-quality-objectives.php

In rural catchments, more than 85% of the sources of nitrogen are from agriculture. A range of agricultural measures have been implemented over the last 4-5 years and have likely contributed to a decline in nitrate concentrations across many catchments detected in 2024 when compared to 2023. These measures include regulatory measures and non-regulatory measures, improvements in nitrogen use efficiency, greater awareness, and unprecedented engagement across the entire agri-food industry to drive improvements in water quality. Climate and weather patterns, a stabilisation in the national herd and a reduction in chemical nitrogen sales over the period also contributed to the reduction. Despite the increase in nitrogen concentrations reported in the subsequent Early Insights report for the first six months of 2025, (see overleaf), levels are still lower than those reported for 2023.

The report recommends that the agriculture sector builds on the current momentum, and continues to implement measures in a targeted way, appropriate to the soil type and catchment setting, and nutrient of concern, the latter indicated on the EPA FLAG and PIP maps. There is also a requirement for resilience to be built into mitigation measures to account for changing climate and weather patterns.

As a requirement under the European Union (Good Agricultural Practice for Protection of Waters) Regulations, and to support the evaluation of Ireland's nitrates derogation, the EPA also publishes an annual 'Water quality monitoring report on nitrogen and phosphorus concentrations in Irish waters'[22]. These reports are based on data from a cohort of monitoring stations within the national monitoring programme that are representative of the impact of agriculture on water quality, and cover a wider network of monitoring sites compared to the Early Insight indicator reports. The most recent report focusing on nutrient concentrations in 2024 found that that there was a 10% reduction in nitrate concentrations in rivers (albeit still too high in the south east, east and midlands of the country), in addition to reduced concentrations within lakes. Although remaining high, the south east was the only region in the country to experience a reduction in nitrate (8%) within groundwater. The number of estuarine and coastal water bodies that exceeded the median winter nitrogen threshold for Good Status increased by 2%, with the highest concentrations

[22] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/water-quality-monitoring-report-on-nitrogen-and-phosphorus-concentrations-in-irish-waters-2024.php

in the south and south east regions. The report noted that the reductions experienced within rivers may take some time to be reflected downstream in marine waters. Regarding phosphorus concentrations, there was no significant change, with 21% of sites in 2024 above the environmental quality standard for Good Status (0.035 mg/l). These are situated in areas with poorly drained soils such as Limerick, Monaghan and the northeast. While acknowledging the improvements, the report highlighted that further reductions in nutrients are required and that measures need to be targeted specifically towards the water quality issue and be reflective of the physical setting.

The latest EPA's Early Insights Indicator Report into nitrogen concentrations in 20 major rivers covers the period January to June 2025[23]. It is based on the monitoring data of 20 representative major river monitoring stations within the national monitoring programme, that are situated at the most downstream monitoring locations on these rivers around Ireland, including sites within Catchments of Concern located along the south, south east and east coasts[24]. The report provides a snapshot, and is indicative only, as it is based on a limited number of samples, taken at the most downstream location of major catchments, (i.e. the six-monthly report is based on six samples at each one of 20 sites). The report assessed previously unreported data and found an early indication that nitrate concentrations at these sites had increased when compared with the same period in 2024, however they are still lower than those reported in 2023.

Further information on water quality is available publicly and can be accessed at www.catchments.ie and https://gis.epa.ie/GetData/Download.

1.5 The Agricultural Catchments Programme

The Agricultural Catchments Programme (ACP), which is funded by DAFM and operated by Teagasc, was established in 2008. The ACP's principal objective is to

[23] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/early-insights-indicator-report-nitrogen-concentrations-in-selected-major-rivers-january-june-2025.php

[24] A number of catchments have been identified as catchments of concern due to elevated nitrogen concentrations: https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/evidence-based-targeting-of-agricultural-measures-to-reduce-nitrogen-in-catchments-to-achieve-water-quality-objectives.php

monitor and evaluate the effectiveness of the package of measures implemented under Ireland's Nitrates Action Programme.

The ACP works in partnership with 300 farmers and integrates bio-physical and socio-economic processes to assess the impact of agricultural activity on water in six intensively farmed river catchments that range from six to 31 km^2. These catchments cover a range of landscape/soil/farming combinations[25]. This intensive bio-physical monitoring undertaken by the ACP since 2008 has provided Ireland with a unique dataset, which has proved to be an invaluable resource in understanding nutrient losses from agriculture.

The ACP runs in four-year cycles and the fifth phase of the programme began in 2024, with an increased budget of 18%. This budget increase was to facilitate the necessary recruitment to deliver an enhanced programme. Within its current phase the ACP continues and expands the research and monitoring of water quality and climate change, while also providing a new emphasis on developing policy ready water and climate mitigation strategies.

Key Findings from the ACP

Table 2 summarises a number of key findings and recommendations from the ACP, which are directly relevant to the management of nutrients.

Table 2 ACP key findings

Key Finding[26]	Recommendations
• Underlying soil type and geology can override the effect of nutrient source pressures. • At the small-catchment scale (ca. 10 km) there is no clear link between stream nitrogen (N) and phosphorus (P) concentrations and nutrient source pressures.	• Targeted and efficient mitigation measures are required.

[25] https://www.teagasc.ie/environment/water-quality/agricultural-catchments

[26] https://www.teagasc.ie/environment/water-quality/agricultural-catchments/publications/

Key Finding[26]	Recommendations
• Long-term weather shifts and short-term weather extremes influence N and P loss to water differently. • Extreme hydrological events (heavy rainfall and drought) have a direct impact on nutrient (N & P) concentrations leaving the catchments. • Climate and hydrological factors (i.e. level, distribution and flow of water) not just nitrogen sources, are the primary drivers and controls of nitrate loss. • Temporal changes in groundwater nitrate concentrations were related to both agronomic, meteorological and hydrogeological factors in two groundwater fed catchments.	• Weather needs consideration and may require different mitigation strategies and real time advice. • Targeted mitigation strategies, e.g. winter cover crops that minimise surplus N losses in well-drained soils when water flow and transport is high. • Nitrogen applications need to be reduced and/or tailored at time of restricted crop growth.
• Following heavy rainfall stream P concentrations were gradually reduced during the “closed period” and did not increase in the four-week period after the end of “closed period”. P concentrations remain higher during the closed period compared to the spreading period, across all catchments.	• Closed period is effective and required • Advice on soil moisture conditions during the spreading period can facilitate better decisions on the time and location for slurry spreading.
• The distribution of nutrient sources is needed within farms and across catchments.	• Advisory support and Knowledge exchange is needed for effective Nutrient Management Planning.

Key Finding[26]	Recommendations
• Reducing farm-gate nutrient surpluses and increasing N and P use efficiency is important from both the agronomic and environmental perspective. • Farmers prefer a flexible Nutrient Management Plan (NMP) approach. Factors such as fertiliser prices, stocking rates, land use potential, use of milk recording technology, contact with extension services and rainfall patterns influence the P balance and use efficiency.	
• There are time lags between agricultural pressures and water quality state, of ca 5 – 10 years. The response times mostly increase with catchment size.	• Time lags need consideration when linking agricultural pressure to water quality state.
• A growing acceptance of environmental benefits from regulation was found. The likelihood of adopting certain nutrient management practice is related to demographic and farm structural factors. • Economic, attitudinal and farm structural factors influence the willingness to adopt a mitigation measure such as a buffer zone. A total of 53% of the catchment	• Farmer cohorts should be considered for land use planning when tailoring policy measures and incentives • Incentives are needed for adoption of substantive buffer zones.

Key Finding[26]	Recommendations
farmers surveyed indicated a negative preference of a fenced 10 metre riparian buffer zone under a 5-year scheme.	
• While certain nutrient and water quality trends are encouraging, improvements in stream ecology require stressors beyond nutrients to be addressed, such as pesticide use and poor riparian habitat restorations.	• Effective physical and temporal measures exist, that seeks to minimise soil erosion and intersect the route for nutrient losses from land. Regular, clearer and stronger targeted communications of current measures is required.

1.6 Agriculture in Ireland

The agri-food sector is Ireland's most important indigenous sector, supporting approximately 170,000 jobs, and exports of almost €19 billion annually, accounting for approximately 6% of modified gross national income and 6% of national employment. More than 4.5 million hectares, some 65% of the total land area in Ireland, are farmed by approximately 135,000 farm families[27]. Government policy is to support a sustainable model of food production that ensures a viable farming sector while protecting the vital resource that is our environment, and the Nitrates Derogation is a critical component of the economic viability of farmers who avail of it. It helps to deliver a significant proportion of the raw material supplies for a dairy sector that delivered exports of over €6.3 billion in 2023, and makes a significant contribution to the rural economy.

Agriculture in Ireland is dominated by grassland with more than 4.2 million hectares growing grass, accounting for 92% of the total agricultural area. This is a result of our mild temperate climate and long grass-growing season, which creates ideal

[27] https://www.cso.ie/en/releasesandpublications/ep/p-fss/farmstructuresurvey2023/

conditions for growing grass, and consequently cattle and sheep spend most of the year outdoors at grass. This grassland system provides multiple benefits including:

- Lower GHG emissions per unit output
- Landscape diversity and biodiversity
- Soil organic carbon
- Feed self sufficiency
- Manure recycling within the holding
- Animal welfare benefits

Ireland's grass based system justifies and necessitates a higher livestock manure allowance than the normal 170kg Nitrogen per hectare.

Cereals are a much smaller proportion of agricultural land, accounting for approximately 270,000 ha, however government targets are to increase the area of tillage to 400,000 ha[28]. Ireland is therefore unique amongst Member States, with its grassland dominance, (see Figure 1).

[28] https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/publications/final-report-of-the-food-vision-2030-tillage-group/

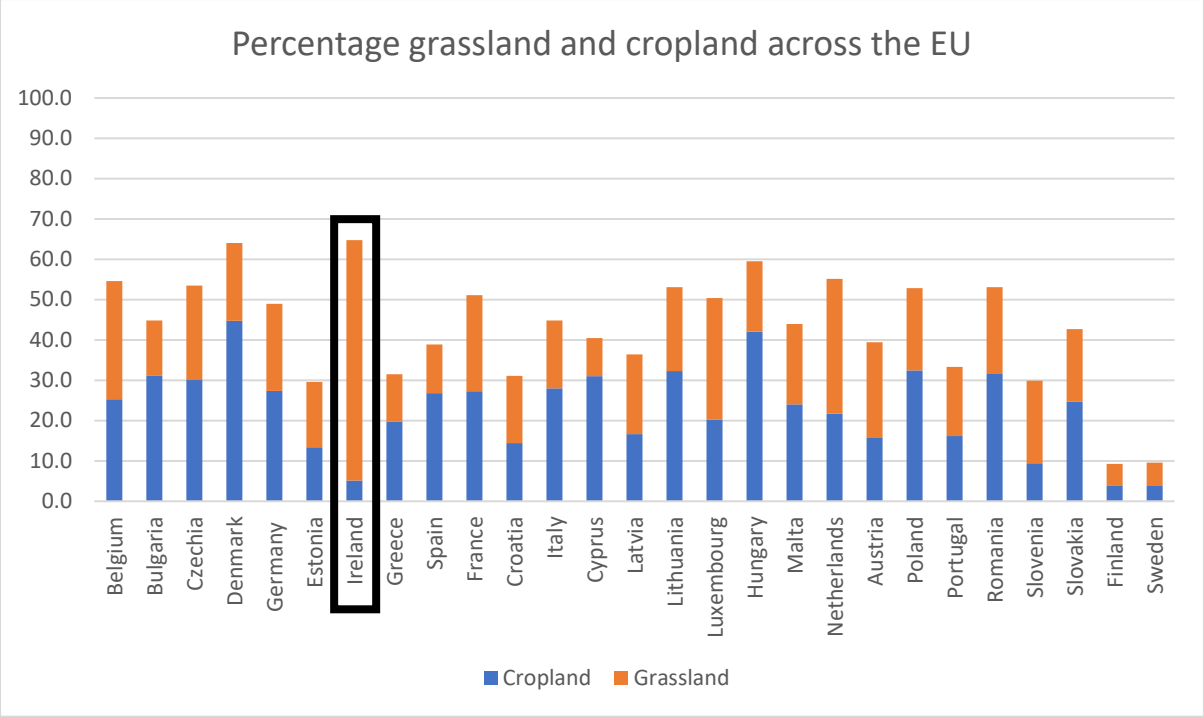

Figure 1 Percentage grassland and cropland across the EU. (Source: Eurostat land cover statistics 2018)[29]

As a result of this grassland system, a unique collaborative approach to agriculture has developed, with milk from farms being supplied to the farmer owned co-ops.

However, Ireland's farming population is ageing, with almost 38% of farmers over the age of 65, and this ageing trend has been continuing year on year, (see Figure 2). This has been one of the contributing factors to a decline in overall cattle numbers in Ireland. From 2015, there was a steady increase in total cattle numbers until 2022 but the numbers have since declined by 3%, returning close to the 2015 figures. It is anticipated that the total cattle numbers will follow this trend in 2025. While the proportion of dairy cows has increased within the national herd during this period the absolute numbers of dairy cows decreased by 1.4% between 2023 and 2024[30].

[29] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Land_cover_statistics#:~:text=roads%20or%20lakes).-,Land%20cover%20in%20the%20EU,and%20wetland%20(1.7%20%25).

[30] Crops and Livestock Survey Final Results June 2024: https://data.cso.ie/table/AAA09

National chemical fertiliser sales for nitrogen and phosphorus content fertilisers also fell by 549,555 tonnes between 2021 and 2023[31]. Compared to peak sales figures in 2018 the fertiliser sales of chemical nitrogen fertiliser reduced by 24%. Compared to the same period, chemical phosphorus fertiliser sales also reduced by 38%.

The reasons for these changes are down to a combination of regulatory changes, improved nutrient management on farms, international fertiliser prices and unfavourable weather conditions.

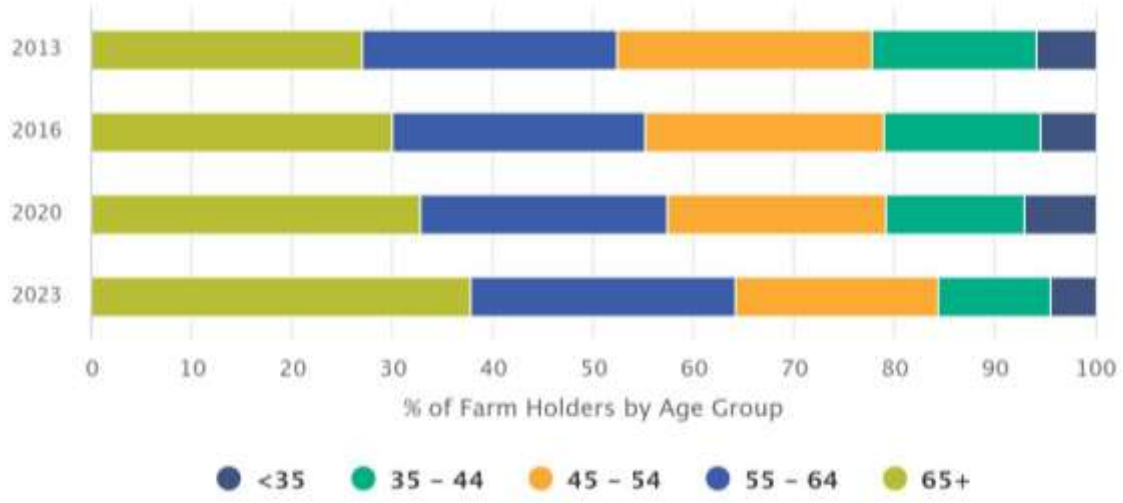

Figure 2 Percentage of farmers by age group. (Source: CSO Ireland)[32]

Farmers have implemented a significant number of measures with the aim of improving water quality and maintaining the nitrates derogation. The nitrates derogation will be a key component of continuing the momentum in the sector in relation to improving water quality.

[31] https://www.cso.ie/en/releasesandpublications/ep/p-fsa/fertilisersales2024/

[32] https://www.cso.ie/en/releasesandpublications/ep/p-fss/farmstructuresurvey2023/demographicprofileoffarmholders/

2 Policy Context

The draft Sixth NAP has been developed in the context of a range of other Government and EU policies, as well as relevant research and stakeholder input, and the programme aims to incorporate these through a coordinated and collaborative approach. Chapter 4 of the Strategic Environmental Assessment Environmental Report (SEA ER) provides more detail on how the objectives and environmental considerations of other plans and programmes have been taken into account during the preparation of the draft Sixth NAP.

2.1 Government Policy

2.1.1 Programme for Government

Ireland's Programme for Government 2025[33] sets out a strong commitment to agriculture and food , as one of Ireland's oldest and largest indigenous employers. Included in this is a commitment by the Government to do "everything within its power to make the case at EU level to secure the retention of the Nitrates Derogation given our unique grass-based production model." As part of the Programme, the Government has committed to:

- Establish a Cabinet Committee on Water Quality chaired by the Taoiseach to coordinate water quality improvements across all sectors.
- Work with farmers and industry to secure Ireland's nitrates derogation at EU level, by implementing the Nitrates Derogation Renewal Plan in support of retention[34].
- Expand the Agricultural Sustainability Support and Advisory Programme (ASSAP)[35].
- Continue to support the Farming for Water European Innovation Partnership (EIP) by increasing funding. This vital scheme improves water quality in

[33] https://www.gov.ie/en/department-of-the-taoiseach/publications/programme-for-government-2025-securing-irelands-future/

[34] https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/press-releases/mcconalogue-publishes-nitrates-derogation-renewal-plan-water-and-agriculture-a-collaborative-approach/

[35] https://teagasc.ie/environment/water-quality/farming-for-water-quality-assap/assap-in-detail

priority areas nationally and directly aids farmers with advice, support and resources.

- Enhance collaboration on water testing by improving partnerships between farmers, Teagasc and the EPA in order to uphold water quality.

Other commitments relating to agriculture include supports for organics; inter-generational farm succession; harnessing renewable energy in the agriculture sector; driving food security and sustainability; implementation of the National Women in Agriculture Action Plan[36], strengthening animal welfare; improving farm safety, and support for innovation and research.

2.1.2 Water and Agriculture – A collaborative approach

Published in 2024 by the Minister for Agriculture, Food and the Marine, "Water and Agriculture – A collaborative approach" [37] sets out the Government's position to work towards retaining Ireland's nitrates derogation, given its importance to Irish agriculture and the wider Irish economy. This policy sets out a pathway through five key areas, namely:

1. Regulatory measures – including a reduction in chemical nitrogen limits and a move to Low Emission Slurry Spreading (LESS) equipment.
2. Government financial supports for farmers – including the provision of financial supports for farm advisers and the €60m Farming for Water EIP.
3. Government, industry and farmers working in tandem – including the Teagasc 'Better Farming for Water' campaign,[38] and engagement with the sector through the Farming for Water EIP and the Local Authority Waters Programme (LAWPRO).
4. Further measures and actions – including environmental and economic assessments, and further research led by Teagasc.
5. Securing Ireland's next nitrates derogation.

[36] https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/publications/women-in-agriculture/

[37] https://assets.gov.ie/static/documents/water-and-agriculture-a-collaborative-approach.pdf

[38] https://teagasc.ie/environment/water-quality/better-farming-for-water/

Many of the actions set out in the policy document are now underway and the draft Sixth NAP commits to delivering on these key areas.

2.1.3 Food Vision 2030 – A World Leader in Sustainable Food Systems

The Food Vision Strategy is a ten-year Strategy for the Irish agri-food sector[39]. Published in 2022, its Vision is that Ireland will become a world leader in Sustainable Food Systems over the next decade. This will deliver significant benefits for the Irish agri-food sector itself, for Irish society and for the environment. By adopting an integrated food systems approach, Ireland will seek to become a global leader of innovation for sustainable food and agriculture systems, producing safe, nutritious, and high-value food, while protecting and enhancing our natural and cultural resources.

The Strategy consists of 22 goals, grouped into four high-level missions for the sector to work towards:

1. A climate smart, environmentally sustainable agri-food sector;
2. Viable and resilient primary producers with enhanced wellbeing;
3. Food which is safe, nutritious and appealing, trusted and valued at home and abroad;
4. An innovative, competitive and resilient agri-food sector, driven by technology and talent.

Included under each mission is a subset of key indicators with an associated 'Target', which can be tracked, along with the Mission Progress, on a dashboard[40]. The target for Mission 1 is "A climate-neutral food system by 2050, with verifiable progress to be achieved by 2023, encompassing emissions reductions, carbon sequestration, improvements in air quality, restoration and enhancement of biodiversity, improvements in water quality, development of diverse forests, enhanced seafood sustainability, exploring the bio-economy and strengthening Origin Green." One of the key indicators under Mission 1 is 'Water Quality', which can be tracked on the dashboard, demonstrating how the importance of water quality

[39] https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/policies/food-vision-2030-a-world-leader-in-sustainable-food-systems/

[40] Food Vision Dashboard

is considered in all governmental strategies relating to the agriculture and food sector.

2.1.4 Rural Development Policy – Our Rural Future 2021 - 2025

45% of the national population lives in rural Ireland[41]. However, this can be much higher regionally, for example in the Western Region, (Donegal, Sligo, Leitrim, Mayo, Roscommon, Galway and Clare), the rural population is 63%[42]. This is compared to an average rural population in the EU of less than 25%[43]. The national Rural Development Policy[44], led by the Department of Rural and Community Development, and the Gaeltacht, sets out a vision for a thriving rural Ireland. It aims to enhance the rural economy, and improve connectivity and sustainability, while emphasising environmentally sustainable practices in agriculture and rural development. It will achieve this through targeted actions in a number of key areas, among them "Supporting the Sustainability of Agriculture, the Marine & Forestry". This chapter of the policy highlights the importance of the agri-food sector to the Irish economy and to rural Ireland, and sets out policy objectives in relation to the environmental sustainability of agriculture.

2.1.5 National Biodiversity Action Plan 2023 – 2030 and EU Biodiversity Strategy 2030

Ireland's 4th National Biodiversity Action Plan[45] (NBAP) sets the national biodiversity agenda for the period 2023-2030 and aims to deliver the transformative changes required to the ways in which we value and protect nature[46].

The 4th NBAP strives for a "whole of government, whole of society" approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen,

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41 https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Urban-rural_Europe_-_introduction#Source_data_for_tables_and_graphs

42 https://westerndevelopment.ie/insights/key-statistics-from-census-2022-for-the-western-region-and-its-counties/#_ftn1- Western Development Commission

43 https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Urban-rural_Europe_-_introduction#Information_on_data

44 https://www.gov.ie/en/department-of-rural-and-community-development-and-the-gaeltacht/publications/our-rural-future-rural-development-policy-2021-2025/

45 https://www.npws.ie/legislation/national-biodiversity-action-plan

46 https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en

community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, while also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to “act for nature”.

This National Biodiversity Action Plan 2023-2030 builds upon the achievements of the previous Plan. It will continue to implement actions within the framework of five strategic objectives, while addressing new and emerging issues:

- Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity
- Objective 2 - Meet Urgent Conservation and Restoration Needs
- Objective 3 - Secure Nature’s Contribution to People
- Objective 4 - Enhance the Evidence Base for Action on Biodiversity
- Objective 5 - Strengthen Ireland’s Contribution to International Biodiversity Initiatives

The EU Biodiversity Strategy for 2030 is a key component of the European Green Deal[47]. It aims to halt biodiversity loss in Europe and restore natural ecosystems by 2030 through a number of actions and goals, including:

- Expansion of Protected Areas to at least 30% of EU land and sea areas and strictly protect 10% of these areas.
- Set Nature Restoration Targets by restoring degraded ecosystems, removing river barriers and reversing the decline of pollinators.
- Improve biodiversity in agricultural systems and increase organic farming.
- Reduce the use and risk of chemical pesticides and tackle invasive alien species.
- Enable implementation through allocation of funds, integrating biodiversity into all EU policies and improving enforcement.

[47] https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en

- Position the EU as a global leader.

In developing the measures for the draft Sixth NAP, the National Biodiversity Action Plan and EU Biodiversity Strategy were considered. The draft Sixth NAP therefore includes measures with co-benefits for biodiversity and the natural environment.

2.1.6 National Adaptation Framework

The National Adaptation Framework (NAF) was published in 2024, and is Ireland's second such framework[48]. It sets out the strategy to reduce vulnerability to climate change including impacts from extreme weather events such as flooding and drought. The Climate Change Sectoral Adaptation Plan for Agriculture, Forest and Seafood[49] was published by DAFM under the National Adaptation Framework, and sets out how the sector will "build resilience to the effects of climate change and weather related events in the agriculture, forest and seafood sector, reduce any negative impacts where possible, take advantage of any opportunities and contribute to achievement of DAFM Statement of Strategy Goals."

2.1.7 Clean Air Strategy for Ireland

Ireland's first clean air strategy is a whole of government commitment and provides the high-level strategic policy framework necessary to identify and promote integrated measures across Government policy that are required to reduce air pollution and promote cleaner ambient air, while also delivering on wider national objectives[50]. This includes meeting reduction commitments for air pollutants, including for ammonia, 99% of which comes from agriculture.

An increase in cattle numbers following the removal of milk quotas in 2015, led to Ireland becoming non-compliant with the ammonia emissions reduction target of the National Emissions reduction Commitments Directive (2016/2284/EU) (NECD) in 2020 and 2021.

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[48] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-adaptation-framework-naf/

[49] https://assets.gov.ie/static/documents/agriculture-forestry-and-seafood-department-of-agriculture-food-and-the-marine.pdf

[50] https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/clean-air-strategy/

However, measures introduced in the Nitrates Action Programme, including the use of low emission slurry spreading equipment, combined with the use of inhibited urea and a reduction in the national herd, are lowering emissions. As a result, Ireland came back into compliance with the NECD reduction target for ammonia in 2023, and this is projected to be maintained provided the planned mitigation measures are implemented[51].

2.1.8 Code of Good Agricultural Practice for Reducing Ammonia Emissions from Agriculture

In 2021, DAFM published a Code of Good Agricultural Practice for reducing Ammonia Emissions from Agriculture, with a view to increasing the awareness of the options open to farmers[52]. This followed the Teagasc published Ammonia Marginal Abatement Cost Curve (MACC) outlining the cost-effectiveness of different measures to reduce ammonia and GHG emissions from agriculture to address compliance with the NECD ceilings. Increasing the proportion of slurry applied using LESS equipment was shown to achieve significant reductions in ammonia emissions over more traditional application methods. Switching to using protected urea was also shown to be a powerful measure.

2.2 National Water Policy: Water Action Plan 2024 (Ireland's 3rd River Basin Management Plan)

As mentioned previously, the Water Action Plan 2024 (WAP) is Ireland's third River Basin Management Plan for the period 2022 – 2027[53].

The overall approach of the plan is the "right measure in the right place", delivered through an increased level of ambition; role clarity and collaborative implementation; integrated catchment management; public participation; and focusing on multiple benefits.

[51] https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/IIR_Ireland-2025_web_v2.pdf

[52] https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/publications/code-of-good-agricultural-practice-for-reducing-ammonia-emissions-from-agriculture/

[53] https://www.gov.ie/en/department-of-housing-local-government-and-heritage/policy-information/river-basin-management-plan-2022-2027/

New targeted and effective measures are required to address declines in water quality and to protect those areas where progress has been made. In addition to improving overall water quality, sustainable water management is important in addressing and adapting to the impacts of climate change, with many of the required measures having co-benefits for climate mitigation and biodiversity. The WAP sets out over 150 actions to address activities impacting waters and to contribute towards the implementation of eleven EU Directives, including the Nitrates Directive. Implementing these measures will require ongoing and adequate financing and resources, reinforced by collaborative participation of stakeholders at national, regional and sectoral levels.

These actions will be delivered through Areas for Action of which there are 517 in total. The approach to selection expands on that taken for the second-cycle, where Priority Areas for Action were managed by the Local Authority Waters Programme. The third-cycle approach is designed to provide 'a place in the plan for everyone' by including a wider selection of Areas for Action incorporating Areas for Protection, Areas for Restoration and Areas for Catchment Projects (see Figure 3).

A key vehicle for delivery of the actions in the WAP is the ongoing work of the **Local Authority Waters Programme** (LAWPRO)[54]. LAWPRO is funded by DHLGH and works on behalf of 31 local authorities as a shared service, coordinating efforts to protect and restore the water quality of Ireland's rivers, lakes, groundwater and transitional and coastal water bodies. It is comprised of 60 specialist staff, working across catchment science and community engagement, and coordinates efforts between local authorities and relevant public bodies; engages with communities and stakeholders; undertakes catchment assessments in Priority Areas for Action; drives WFD governance particularly at regional level; and contributes to innovative approaches to improving water quality. Working with the **Agricultural Sustainability Support and Advisory Programme (ASSAP)**[55], LAWPRO is central to delivering the objectives of the WAP.

[54] https://lawaters.ie/

[55] https://teagasc.ie/environment/water-quality/farming-for-water-quality-assap/

ASSAP is a free and confidential advisory service provided to farmers to help improve water quality. It is comprised of more than 60 specialist advisers, and is co-funded by DHLGH, DAFM and the agri-food industry. When first introduced in the second RBMP cycle, DHLGH and DAFM provided 20 advisers, with the agri-food sector providing nine. It has since grown to include additional advisers, with the agri-food sector now providing 40 advisers, and some meat producers beginning to provide advisers as well as the dairy co-ops, demonstrating the buy-in that exists within the sector. Working with farmers on an individual basis, ASSAP advisers can support:

- Improved nutrient management with more targeted use of slurry and fertiliser.
- New approaches to land management to reduce nutrient losses from critical source areas.
- Better farmyard management and practices.

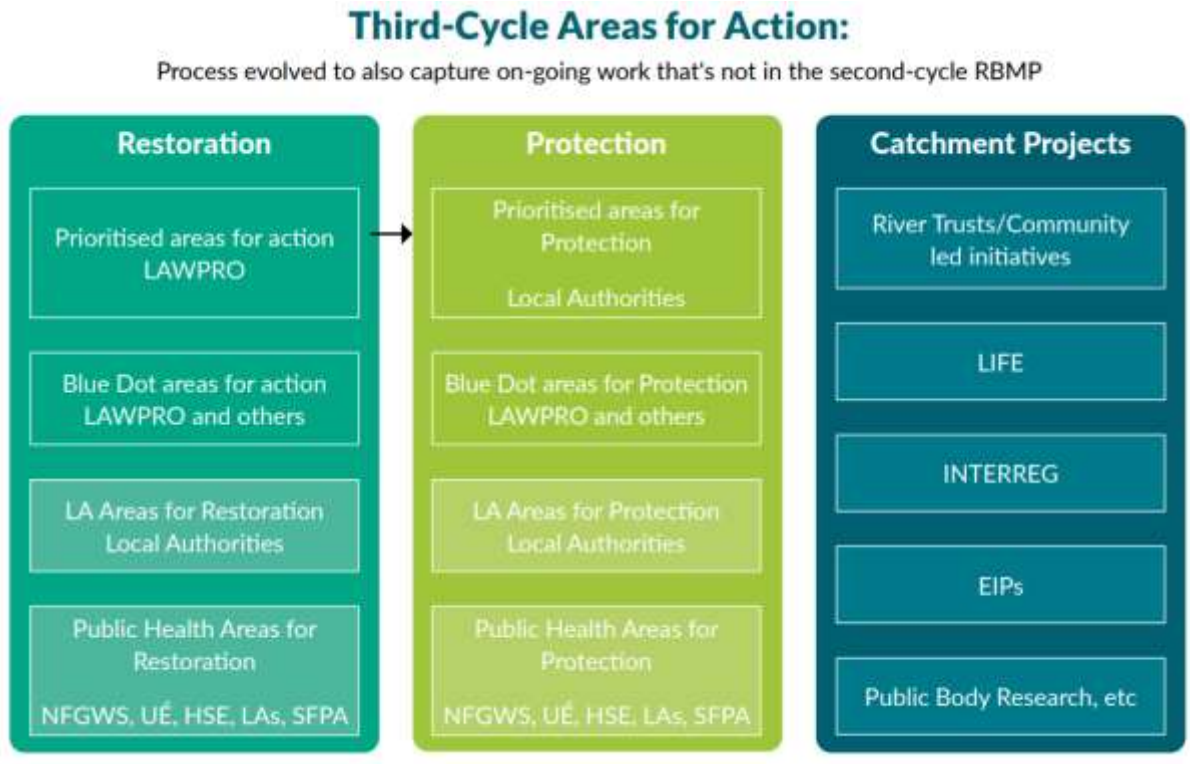

Figure 3 Third-Cycle Areas for Action Framework

In relation to agriculture as the most frequent pressure, the WAP cites the NAP, as put into effect through the GAP Regulations, as having a key role in addressing

agricultural pressures on water quality, alongside the Farming for Water EIP. The WAP sets out 12 actions to address agricultural pressures impacting on water quality as set out in Table 3.

Table 3 Water Action Plan 2024 Agri-Measures (further details on each action can be found in Appendix 2 of the WAP)[56]

Measure	Measure outline
Agri 1	DHLGH and DAFM will oversee the implementation of the stronger and more targeted Nitrates Action Programme.
Agri 2	Local Authorities will strengthen the inspection and enforcement relating to agricultural diffuse pollution. A total of 57 new Inspectors in local authorities have been allocated for the National Agricultural Inspection Programme (NAIP) and five new staff have been allocated to the EPA to oversee the programme. An additional four staff have been allocated to the Local Authority Waters Programme to help in co-ordinating the activity and avoiding duplication where possible. Inspections will be targeted and risk-based using all the available evidence, on up to 4,500 farms per annum. DAFM will undertake 500 - 1,000 inspections per year under the GAP Regulations, focused in Q1 where risk of nutrient impact on water quality is high. DAFM has increased their derogation inspections from 5% to 10% of all derogation farms per year, and will undertake approximately 700 derogation inspections per annum.
Agri 3	DAFM will implement Ireland's CAP Strategic Plan with a strong emphasis on the achievement of a higher level of environmental ambition. This includes implementing the new Green Architecture of (1) Conditionality, (2) Pillar I Eco-Schemes and (3) the Pillar II Interventions such as ACRES and the new Farming for Water EIP.

[56] https://www.gov.ie/en/department-of-housing-local-government-and-heritage/publications/river-basin-management-plan-2022-2027-programme-of-measures-to-protect-and-restore-our-waters/

Measure	Measure outline
Agri 4	Eco-scheme measures will contribute to the protection of water quality. DAFM will promote and target the uptake of these measures in locations at farm level where they will maximise water protection. This will be achieved through training and farm advisory services and by using the Pollution Impact Potential (PIP) maps generated by the EPA.
Agri 5	The Farming for Water EIP project led by LAWPRO, in partnership with Teagasc and Dairy Industries Ireland, will focus on reducing losses of phosphorus, nitrogen, sediment and, where relevant, pesticides to water from agricultural lands, by promoting the adoption of innovative best practice in nutrient management, the application of Nature-based Solutions and other suitable measures. The project will aim to support up to 15,000 farmers in implementing on-farm water protection and mitigation measures.
Agri 6	DHLGH and DAFM will put arrangements in place to ensure independent assessments and reviews of the efficacy of the Nitrates Action Programme (NAP), the CAP Strategic Plan and the Farming for Water EIP (and other relevant measures) to bring the 1,000 water bodies impacted by agriculture up to good status and to prevent deterioration. They will identify additional measures, where necessary, which will be implemented during the lifetime of the plan or beyond, where justified under Article 4 of the WFD. Mechanisms for review will include; DHLGH monitoring & assessment of progress with the programme of measures, EPA's statutory role in assessing the NAP, EPA research projects and the CAP Strategic Plan Performance Monitoring and Evaluation Framework (PMEF).
Agri 7	In support of the Catchment Management Work Plans, the Department of Agriculture, Food and the Marine will publish an Agricultural Sectoral Action Work Plan to reduce nitrogen losses to waters in areas where levels are

Measure	Measure outline
	increasing or are too high, and to bring nitrogen, phosphorous and sediment losses to water from agricultural sources within sustainable levels by 2027.
Agri 8	Online Farm Sustainability Planning: Teagasc will develop an online Farm Sustainability Plan for farmers, complementing the existing Nutrient Management Planning online tool to support the wider Agricultural Knowledge and Information Systems (AKIS) programme.
Agri 9	Extend and expand the local authorities' water protection office. LAWPRO will be extended for the full duration of Cycle 3 up to 2027. The CCMA will identify the appropriate level of resources and involvement of LAWPRO to meet WFD objectives up to 2027 and beyond in future RBMPs.
Agri 10	Provide free on-farm advice to farmers. The sustainability advisory service (ASSAP) will be extended for the full duration of Cycle 3. The dairy industry has increased the number of advisers involved in ASSAP by six for the period 2022 to 2027, and additional supports are now also being provided by the meat industry.
Agri 11	To support the goal of targeting the right measure in the right place, all farm advisers involved in the 'Farming for Water' EIP will be provided with ongoing professional development, including an appropriate level of catchment science training, to ensure that measures are sufficiently targeted.
Agri 12	Upskill farmers and advisers to ensure they have the knowledge and tools to implement appropriate measures to reduce the impact on water quality and freshwater biodiversity from farming practices.

Water Action Plan – Agriculture Sectoral Action Work Plan (SAWP)

The development, implementation and tracking of Sectoral Action Work Plans (SAWP) are a requirement of the WAP for each of the sectors. These work plans outline actions by key sectors at a national scale aimed at ensuring that, over time, the relevant sector will no longer be a significant pressure impacting water bodies or causing deterioration in water quality. Sectors addressed include agriculture, pressures on hydromorphology, forestry, urban wastewater, activities impacting peatland, and invasive alien species, in addition to drinking water source protection (focusing on the development of drinking water safety plans). DAFM is the lead implementing body for the SAWP for agriculture. This particular work plan outlines the steps involved in implementing the 12 WAP actions for agriculture (and any other actions relevant to water quality), including targets, key performance indicators and delivery dates. Sector leads, such as DAFM, will review SAWPs annually and they will be publicly available on the Government's website here: www.gov.ie/RBMP.

Water Action Plan – Catchment Management Work Plans

Over the lifetime of the WAP and supported by the SAWPs, there will be 46 Catchment Management Work Plans (CMWP) developed to support the implementation of measures at the waterbody scale. Provision of spatial data on the measures implemented will be key to allow for an evidence-based evaluation of measures on water quality. Five pilot catchments have been identified to support the development of a template that will allow for the roll out of these CMWPs in 2026.

Local Authority Water Action Work Plans

The Local Authority Water Action Work Plans will set out the actions assigned to each local authority to protect and restore water quality in Ireland. These plans will outline the local authority roles and responsibilities in terms of their WFD obligations and will support better alignment with Recommended Minimum Criteria for Environmental Inspections (RMCEI) reporting. The plans will include detail on the activities currently reported under RMCEI, such as those carried out under the National Agricultural Inspection Programme, as well as other activities carried out to protect the water environment. LAWPRO is establishing a working group with membership from local authorities to design a template by Q4 2025 for full roll out in

2026. These plans will be public facing and will be integrated into the Catchment Management Work Plans that are informed by the Sectoral Action Work Plans.

Farming for Water European Innovation Partnership

The Farming for Water European Innovation Partnership (EIP) is an initiative under the European Innovation Partnership for Agricultural Productivity and Sustainability (EIP-AGRI)[57]. This €60m project enables collaboration among farmers, researchers, policymakers, and other stakeholders to co-develop and refine innovative solutions to deliver water quality and environmental benefits. It has a focus on developing targeted measures that are implementable and scalable to local, catchment and national levels. The Department of Agriculture, Food and the Marine (DAFM) and the European Commission (EC) are providing €50m, which is ring fenced for farmer payments to implement targeted actions on the ground, which are above regulatory requirements. The Department of Housing, Local Government and Heritage (DHLGH) is providing the administrative support for the project to the value of €10m. The Local Authority Waters Programme (LAWPRO) leads this initiative in partnership with Teagasc and Dairy Industry Ireland (DII). Where LAWPRO undertake a catchment assessment and identify agriculture as a pressure, the farm is referred to ASSAP, who engage with the farmer to identify and implement appropriate measures from a list of 43, which are over and above regulatory requirements, using tools such as the EPA PIP and FLAG maps[58]. Launched in March 2024, the programme will run until 2027. However, it is proposed in this draft Sixth NAP to extend the life of the project to at least the duration of this NAP.

Industry Led Initiatives: Blackwater & Slaney Projects

The Dairy Sustainability Ireland (DSI) initiative of DII brings together the eight main dairy processors and members of the Irish Co-operative Organisation Society (ICOS) to develop targeted plans to protect and improve water quality. Every major dairy processor has identified, and is working in, at least one key catchment area as

[57] https://farmingforwater.ie/app/uploads/2025/01/Measures-Booklet-Single-sheet.pdf

[58] https://gis.epa.ie/EPAMaps/agriculture

recommended in a recent EPA funded research report[59]. These projects bring other key industry stakeholders together with the common objective of raising awareness and fostering a collective approach to improving water quality. Examples include the River Blackwater Catchment Programme[60] and the Farming for Water: River Slaney Projects[61].

Waters of LIFE IP

The Waters of LIFE project is an EU LIFE Integrated Project (IP), with the objective of reversing the decline in Ireland's most pristine (or High Status Objective) water bodies[62]. The project was originally established under the second cycle River Basin Management Plan 2018 – 2021, and acts as a catchment scale demonstration project, for the effective implementation of a catchment-based approach for the application of measures. The project partners include DHLGH, DAFM, Teagasc and LAWPRO, and the project is working with farmers in a number of water bodies to develop and implement a results-based payments scheme in order to benefit these High Status Objective water bodies[63].

2.3 European and International Policy

2.3.1 Common Agricultural Policy

The Common Agriculture Policy (CAP) Strategic Plan came into effect in January 2023 and runs to the end of 2027[64]. Ireland's CAP Strategic Plan (CSP) 2023-2027 has a strong emphasis on the achievement of a higher level of climate and environmental ambition and contains measures that aim to improve biodiversity and water quality, as well as contributing to national and EU climate and environmental targets. The CSP specifies that performance will be based on outputs and results. It

[59] https://www.epa.ie/publications/research/water/research-482-mitigating-agricultural-impacts-on-water-quality-through-research-and-knowledge-exchange.php

[60] https://www.agriland.ie/farming-news/programme-launched-to-enhance-water-quality-in-river-blackwater-catchment/

[61] https://www.tirlan.com/sites/default/files/2024-04/tirlan-farming-for-water-river-slaney-project-information-leaflet.pdf

[62] https://www.watersoflife.ie/

[63] https://www.watersoflife.ie/app/uploads/2024/11/2024-AEP-Programme-Booklet.pdf

[64] https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-2023-27_en

also outlines how it contributes to CAP objectives at EU level and to additional environmental objectives under the Water Framework Directive, and Birds and Habitats Directives, as set out in national policies, including the Water Action Plan, National Biodiversity Action Plan and All Ireland Pollinator Plan.

DAFM is responsible for the development and implementation of Ireland's CSP, which contains a range of broad and targeted water quality interventions across the Green Architecture of the CAP Strategic Plan. This consists of Enhanced Conditionality, applicable to all farmers with >10ha that are in receipt of Direct Payments, a voluntary annual Eco-Scheme targeted at all farmers and then more targeted agri-environmental interventions under Pillar II of the CAP such as ACRES (the Agri-Climate Rural Environment Scheme), the Targeted Agricultural Modernisation Scheme (TAMS) and the Farming for Water EIP.

The Agri-Climate Rural Environment Scheme (ACRES) is split into 'ACRES General' and 'ACRES Co-operation Project (CP)'. ACRES general is open to farmers nationally whilst ACRES CP is a locally adapted results-based approach to supporting the delivery of ecological services by farmers and is targeted specifically at 'High Nature Value farmland'. DAFM data shows that approximately 81.5% of all WFD high status objective water bodies are covered by the ACRES CP Zones.

Farmlands within ACRES CP are scored using specially designed scorecards, which are used to calculate the payments farmers receive. The higher the score, the higher the payment. Farmers may apply to implement measures on their land to improve the condition of a habitat/watercourse, which will improve their score and hence their payment the following year. Measures available to protect/improve water quality are designed to prevent/reduce nutrient and sediment losses to water.

There are almost 54,000 farmers in ACRES, with just over 20,500 farmers participating across the eight ACRES CP zones and just under 33,400 farmers participating in the ACRES General approach. Of those farmers participating in the ACRES General approach, over 4,000 are within either 'Catchments with High Status Water objectives' or 'Water Vulnerable areas'.

The Targeted Agriculture Modernisation Scheme (TAMS) plays a significant role in providing funding for on-farm investment to farmers to build and/or improve a

specified range of farm buildings and equipment on their holdings. Of specific relevance to improving and maintaining water quality, TAMS offers a number of grant aided eligible items.

Under these funding schemes, approximately €394 million grant aid was issued from 2016 to 2024. Mass concrete nutrient storage tanks represented 75% of this funding with mobile slurry tanks with low emission slurry spreading attachments representing approximately 16% of this funding. Other notable grant aided items claimed under these funding schemes include circular slurry stores, geo-membrane lined store, manure pits, precast concrete tanks including cover, retrofit dribble bar to existing mobile slurry tanker and umbilical slurry spreading system.

Common Agricultural Policy (CAP) post-2027

The European Commission's proposals for the CAP post-2027 propose a structural change so that CAP Strategic Plans will be integrated with National and Regional Partnership (NRP) Plans. The Commission propose the CAP budget will continue to support farm incomes using tools including area-based income support, agri-environmental actions, support to small and young farmers, and support for on-farm investments such as farm modernisation, diversification or support to facilitate uptake of new practices and technologies.

The Farm Stewardship requirements proposed for CAP post-2027 will bring the Conditionality for basic income support and supports for targeted voluntary agri-environment management commitments together under the one umbrella. This is proposed to allow more effective targeting of measures under the mandatory environment and climate priority areas including water resilience, biodiversity preservation and climate change adaptation as well as mitigation. The Commission has proposed that measures to reduce nitrates surplus in waters will be specifically required in Member States where this is an issue. In addition to the Statutory Management Requirement to protect water, it is expected that water quality measures will continue to be supported under the CAP post-2027[65].

[65] https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/collections/cap-post-2027-consultative-committee/

2.3.2 European Vision for Agriculture and Food

The European Commission's 'Vision for Agriculture and Food' published in February 2025 outlines a long-term strategy to guide the future of the EU's agri-food system to 2040[66]. It seeks to balance economic viability, environmental sustainability, social fairness and innovation.

For farmers it aims to ensure fair incomes, reduce unfair trading practices, reward ecosystem services, improve transparency in the food chain and encourage generational renewal. From an environmental perspective, the goal is to promote practices that preserve soils, water and biodiversity, adopt climate smart farming, reward carbon removal and promote voluntary sustainability benchmarking.

Areas for action under the Commission's Vision include development of a Water Resilience Strategy, to present a bio-economy strategy and to propose a fairer, simpler and targeted Common Agricultural Policy.

2.3.3 European Water Resilience Strategy

The EU 2025 Water Resilience Strategy aims to ensure that all Europeans have access to sufficient and good quality water, and to guarantee the good status of all water bodies across the continent[67]. EU rules aim to ensure that water is managed sustainably in the long-term, water pollution is reduced, and aquatic ecosystems are protected.

This will be achieved by focusing on three objectives:

- Restore and protect the water cycle as the basis for water supply;
- Build a water-smart economy to boost competitiveness, attract investment and promote the EU's water industry;
- Secure clean and affordable water and sanitation for all, and empower consumers for water resilience.

[66] https://agriculture.ec.europa.eu/overview-vision-agriculture-food/vision-agriculture-and-food_en

[67] https://commission.europa.eu/topics/environment/water-resilience-strategy_en

The draft Sixth NAP aligns with these objectives through seeking to reduce pollution in water bodies and protecting aquatic ecosystems from harmful impacts that may arise from agricultural activity.

2.3.4 EU Farm to Fork Strategy 2030

The Farm to Fork Strategy is a central component of the European Green Deal, aiming to create a fair, healthy, and environmentally sustainable food system[68]. Its core goal is to transition EU agriculture towards sustainability by 2030, through addressing climate change, biodiversity loss and health considerations. Key focus areas include reducing pesticide use, lowering nutrient losses, cutting antimicrobial use and increasing organic farming. The strategy promotes shorter supply chains, improved animal welfare and empowering consumers; and supports farmers with innovation, a fair income and access to sustainable practices.

The draft Sixth NAP aims to support this transition through the implementation of innovative environmental measures which are developed collaboratively, with the provision of financial supports through the Farming for Water EIP, a well as providing free, targeted advice through ASSAP.

2.3.5 Sustainable Development Goals

The Sustainable Development Goals (SDGs) are a collection of 17 objectives adopted by the United Nations in 2015, with the aim of addressing the world's most significant challenges by 2030. Ireland is a signatory to the SDG as part of our commitment to the United Nations 2023 Agenda for Sustainable Development, which was adopted by all UN member states.

SDG 6 – Ensure availability and sustainable management of water and sanitation for all

SDG 6 aims to ensure that there is safe drinking water, sanitation and hygiene for all, as well as a clean and adequate supply of water for water dependent species.

Nitrate concentrations are not considered a pressure on drinking water supplies in Ireland, and the NAP and implementing regulations continue to provide protections

[68] https://food.ec.europa.eu/horizontal-topics/farm-fork-strategy_en

to drinking water sources and abstractions through prescribed buffers and technical assessments of the conditions in the vicinity of abstraction points.

The NAP is also a protective measure under the Water Framework Directive and sets limits for agricultural production.

SGD 14 – Conserve and sustainably use the oceans, seas and marine resources for sustainable development

SDG 14 aims to conserve and sustainably use marine resources through reducing marine pollution, protecting marine and coastal ecosystems, regulating fishing, implementing conservation measures, supporting small scale fishers, addressing acidification and enhancing sustainable use. Nitrogen is a key limiting factor for Ireland's estuarine environment, and can have a negative environmental and economic effect through negatively impacting estuarine ecology and consequently, shellfish. Therefore, any further nutrient reductions achieved by the measures proposed in the draft Sixth NAP will be of direct benefit.

2.3.6 Organisation for Economic Co-operation and Development (OECD) Principles - Water Governance

The OECD Principles on Water Governance were adopted in 2015 and establish a framework of 12 principles, which are organised under three pillars of Effectiveness, Efficiency and Trust & Engagement[69]. Table 3 summarises how the draft Sixth NAP aligns with the OECD Principles on Water Governance.

[69] https://www.oecd.org/en/topics/sub-issues/water-governance/the-oecd-principles-on-water-governance-and-implementation-strategy.html

Table 4 Draft Sixth NAP alignment with OECD Principles on Water Governance

Pillars	Principle	How the draft Sixth NAP aligns
Effectiveness	1. Clear roles and responsibilities 2. Appropriate scale 3. Policy coherence 4. Capacity	DHLGH is responsible for the development of the draft Sixth NAP, with DAFM responsible for the application for a nitrates derogation. The NAP is a basic measure under the WFD and the Water Action Plan 2024 sets out the clear governance structure for water across all sectors in Ireland. In developing the draft Sixth NAP, Ireland adopted a whole of territory approach rather than Nitrates Vulnerable Zones as the appropriate scale for Ireland. The draft Sixth NAP builds on the previous five NAPs and aligns with the objectives of the Water Action Plan 2024. Additional resources have been provided for a team of new inspectors across all local authorities and the EPA for the implementation of the National Agricultural Inspection Programme, and through the WAP, resources are provided for LAWPRO, ASSAP and the Farming for Water EIP for the implementation of measures.
Efficiency	5. Data and information 6. Financing 7. Regulatory frameworks	The EPA assesses water quality nationally, producing reports required under the Nitrates Directive and the Commission's Implementing Decision on the Nitrates Directive. In addition, the EPA publishes reports on the WFD, as well as datasets and maps.

Pillars	Principle	How the draft Sixth NAP aligns
	8. Innovative governance	Financing has been provided for the National Agricultural Inspections Programme through the NAP, as well as the €60m Farming for Water EIP and ASSAP through the WAP, and the draft Sixth NAP proposes to extend these programmes. In developing the measures, the Nitrates Expert Group (NEG) makes recommendations to the Minister, which, if accepted, are then brought forward to the draft Nitrates Action Programme. Following a public consultation and environmental assessment, the NAP is given a statutory basis through the GAP Regulations. The NAP is a basic measure in the protection of water quality and so lies within the umbrella governance structure of the RBMP. In the second cycle of the RBMP, Ireland implemented governance reform using a clear three-tiered system[70]. EPA research showed that

[70] OECD (2018), *Implementing the OECD Principles on Water Governance: Indicator Framework and Evolving Practices*, OECD Studies on Water, OECD Publishing, Paris, https://doi.org/10.1787/9789264292659-en.

Pillars	Principle	How the draft Sixth NAP aligns
		governance structures are now broadly appropriate and should be refined rather than replaced[71,72].
Trust & Engagement	9. Integrity and transparency 10. Stakeholder engagement 11. Trade-offs 12. Monitoring and evaluation	Reporting is undertaken on the implementation of the NAP through the EPA Nitrates Directive Article 10 reports, and the GAP Regulations Article 29(2) report. The NEG recommendations are provided to the Minister and are freely available, and minutes and agendas for all NEG meetings are posted on the Government website. Ireland has established robust participatory frameworks with a focus on collaboration through for example, An Fóram Uisce and the Agriculture Water Quality Working Group. Locally led measures such as the Farming for Water EIP and direct engagement with individual farmers through ASSAP ensures positive stakeholder engagement. Regular reporting on water quality by the EPA ensures the effectiveness of measures can be assessed and refined, with scope within the EIP to develop and implement new measures.

[71] https://www.epa.ie/publications/research/water/Research_Report_372.pdf

[72] https://www.epa.ie/publications/research/water/research-373-using-an-experimental-governance-lens-to-examine-governance-of-the-river-basin-management-plan-for-ireland-20182021.php

3 Existing and Continuing Measures

3.1 Summary of preceding Nitrates Action Programmes

The draft Sixth Nitrates Action Programme builds on the progress achieved over the preceding Programmes, in particular the fifth, which introduced a suite of new measures, both regulatory and non-regulatory, (see Section 3.2).

The following summarises the preceding Nitrates Action Programmes:

3.2 First Nitrates Action Programme (2006–2010)

The First NAP was introduced to meet Ireland's requirements under the EU Nitrates Directive. It was implemented through S.I. 788/2005, and amended by S.I. 378/2006. Key features included:

- The first GAP Regulations;
- Limits for nitrogen and phosphorus application based on soil and crop type;
- The introduction of closed periods for slurry spreading and guidelines for manure storage;
- A focus on education and awareness raising; and
- A derogation allowing some farmers who meet specific criteria to avail of a higher organic manure limit, subject to adherence to stricter environmental rules and authorisation from DAFM.

3.3 Second Nitrates Action Programme (2010–2013)

The Second NAP built on the First NAP with enhanced measures and improved compliance. It was implemented through S.I. 610/2010, as amended. Key features included:

- More precise nutrient management planning;
- A greater emphasis on monitoring and enforcement;
- Adjustments to the slurry spreading calendar;
- Adjusted organic nitrogen limits;

- Improved requirements for storage and handling of organic manures; and
- A renewal of the derogation allowing some farmers who meet specific criteria to avail of a higher organic manure limit, subject to adherence to stricter environmental rules and authorisation from DAFM.

3.4 Third Nitrates Action Programme (2014–2017)

The Third NAP was implemented through S.I. 31/2014 and reflected evolving environmental goals. Key features included:

- Increased emphasis on water quality monitoring;
- Strengthened controls around buffer zones near water bodies;
- New rules for soiled water storage and usage;
- Enhanced cross-compliance with Common Agricultural Policy (CAP) supports; and
- A renewal of the derogation allowing farmers to avail of a higher organic manure limit, subject to adherence to stricter environmental rules.

3.5 Fourth Nitrates Action Programme (2018–2021)

The Fourth NAP, implemented under S.I. 605/2017, reflected growing concerns about Ireland's water quality, biodiversity, and greenhouse gas (GHG) emissions. Key features included:

- Tightened rules on slurry spreading, stocking rates, and chemical fertiliser use;
- Mandatory training for derogation farmers;
- Greater alignment with climate change and ammonia reduction targets;
- Expanded environmental monitoring and scientific advisory support; and
- A renewal of the derogation allowing some farmers who meet specific criteria to avail of a higher organic manure limit, subject to adherence to stricter environmental rules and authorisation from DAFM.

3.6 Fifth Nitrates Action Programme (2022–2025)

Ireland's Fifth NAP (2022–2025) was the strongest to date and introduced a broad suite of measures, both regulatory and non-regulatory, with a collaborative approach to the delivery of the programme from all stakeholders including the State, farmers, farming organisations and farmer-owned cooperatives. This approach represented a significant commitment and investment from the State, but also from the farming sector, with support being provided by the sector in the form of the Agricultural Sustainability, Support and Advisory Programme (ASSAP) advisers and through participation in a number of locally-led pilot European Innovation Partnership (EIP) projects. Implemented through S.I. 113/2022, as amended, it was subject to a midterm interim review in accordance with the Commission Implementing Decision on the nitrates derogation which resulted in the introduction of additional measures, and reflected commitments set out in the European Green Deal and the Farm to Fork Strategy. The interim review of the Fifth NAP was finalised in February 2025. Key features of the Fifth NAP included:

- Establishment of a register of chemical fertiliser sales;
- Online 4-day export of organic fertiliser notification requirement;
- Establishment of a new local authority National Agricultural Inspection Programme (NAIP);
- Revised livestock excretion rates;
- Revised chemical nitrogen allowances; and
- A renewal of the derogation allowing some farmers who meet specific criteria to avail of a higher organic manure limit, subject to adherence to stricter environmental rules and authorisation from DAFM.
- Following the interim review, these limits were reduced to 220 kgN/ha for the majority of derogation farms.

Table 5 summarises the five Nitrates Action Programmes to date.

Table 5 Summary of Ireland's Nitrates Action Programmes

NAP	Years	Key Focus
1st	2006–2010	Initial compliance, basic nutrient limits
2nd	2010–2013	Better planning, monitoring, enforcement
3rd	2014–2017	Buffer zones, water quality focus
4th	2018–2021	Climate links, tighter controls
5th	2022–2025	Targeted rules, new enforcement resources, digital tools, stricter limits

4 Review of the Fifth Nitrates Action Programme

The Fifth NAP 2022 – 2025 was the most ambitious to date, introducing a broad range of measures, both regulatory and non-regulatory, including financial supports, advisory support and a new inspection and enforcement programme. An interim review of the Fifth NAP was undertaken, with an amendment to the GAP Regulations added through S.I. 42 of 2025 in February 2025, establishing a number of additional measures on a statutory basis. See Table 6 for a summary of the Fifth Nitrates Action Programme measures.

4.1 EPA Evidence

Article 10 of the Nitrates Directive requires Member States to report to the European Commission on the preventative measures every four years to include, inter alia, a summary of the monitoring results and a summary of the principal measures in the NAP. The EPA compiles the report for Ireland, with the most recent report covering the seventh reporting period 2020 – 2023[73]. This report therefore overlaps with the beginning of Fifth NAP but water quality improvements directly associated with the Fifth NAP would not be expected to be realised in this timeframe given a majority of

[73] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/Nitrates-Article-10-Report-for-Ireland-2020-2023.pdf

the measures were phased in over the NAP period. This reporting period also predates the interim review. The report indicated that groundwater, riverine and transitional water nitrate concentrations had increased since the preceding reporting period.

The EPA published a report in August 2025 titled “Evidence-based targeting of agricultural measures to reduce nitrogen in catchments to achieve water quality objectives”[74], which provided three inter-related updates to the evidence base to support the Water Action Plan 2024 approach of “the right measures in the right place” as follows:

- an assessment of the catchments that require nitrogen reductions, which updates a previous report for the period 2017 – 2019, incorporating more recent data;
- an assessment of the changes in the nitrate distances-to-target since 1990 for these representative catchments, and
- the Farm and Landscape measures for Agriculture (FLAG) map, (formerly the Targeting Agricultural Measures map) has been updated to indicate where agricultural measures should be targeted to restore water quality. This map is used by local authorities to help in the identification of areas to undertake farm inspections, and in targeting measures under the Farming for Water EIP.

The report assessed the nitrogen load in 20 representative catchments, which indicated that nitrogen losses in our catchments had decreased in recent years. Consequently, the amount of nitrogen that must be reduced to meet ecological targets had also declined across all but one location, (the Blackwater catchment), compared to the previous assessment based on the 2017–2019 reporting period. Based on data from 2022–2024, seven of the 20 catchments still require nitrogen reductions, ranging from 2% to 38%. The highest reductions are needed in the Barrow catchment, followed by the Slaney catchment. The five other catchments

[74] Evidence-based targeting of agricultural measures to reduce nitrogen in catchments to achieve water quality objectives | Environmental Protection Agency

needing nitrogen reductions are the Bandon, Blackwater, Boyne, Nore and Suir catchments.

The EPA 'Early Indicators' report, which assesses nitrogen levels at 20 selected key river monitoring sites, was introduced in 2024 and reports on a 6-monthly basis. The "Early insights indicator report: Nitrogen concentrations in selected major rivers January-December 2024" also reported the reductions[75]. The report found that nitrate concentrations at these representative sites were lower than the previous year, though the nitrate concentrations in the 'Catchments of Concern' remained too high.

The GAP Regulations require the EPA to complete an annual report of water monitoring results to be used in the evaluation of the nitrates derogation, called the "Water quality monitoring report on nitrogen and phosphorus concentrations in Irish waters", with the most recent report of this kind published in 2025 for the 2024 monitoring period[76]. This report uses data from a wider network of monitoring stations, and also found that there had been a 10% reduction in riverine nitrate concentrations in most regions however, nitrate concentrations in rivers remain too high in the south eastern half of the country.

Despite these reported reductions, the recent EPA Early Insights report for January – June 2025, shows an increase in river nitrogen levels when compared with the same period the previous year. The levels however, are still lower than those detected in 2023 and marginally lower than 2020.

Most recently, on the 14 October 2025, the EPA published their Water Quality in Ireland 2019 – 2024 report[77]. The Water Quality in Ireland report is the most comprehensive report on the assessment of water quality in Ireland published by the EPA and provides the most recent 3-yearly data. The report shows that water quality is not achieving WFD targets, with 52% of surface waters achieving good or high

[75] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/Early-insights-indicator-report-N-concs-Jan-Dec-2024.pdf

[76] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/Water-Quality-Nitrogen-and-Phosphorus-Report-2024.pdf

[77] https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/water-quality-2019-2024-summary-report.php

status, (a reduction from 54% in the previous reporting cycle), and 92% of groundwaters at good status. Transitional waters are in the poorest condition of any waterbody type, with 70% in an unsatisfactory condition, which is an increase from 64% in the previous assessment.

It is noteworthy however, that nutrient concentrations decreased over the reporting period, and it will take time for this to be reflected in the ecological status. The report also highlights that in Priority Areas for Action, there have been improvements in phosphorus conditions, demonstrating that where targeted action is undertaken improvements are following, and achieving phosphorus levels to facilitate good ecological status is possible.

Year on year, nitrogen levels will fluctuate depending on source loading, agricultural land management and weather patterns, and an overall downward trend as a result of measures introduced in the Fifth NAP may only be evident over a number of years. Nevertheless, the increase in levels detected in the first six months of 2025 underlines the need to include strengthened, targeted measures in the Sixth NAP.

The Fifth NAP introduced a range of protective measures that have likely contributed to mitigating nitrogen losses to water. It is clear however, that there is still more to do in a number of vulnerable catchments, particularly in the south eastern half of the country. It is important that the agricultural sector builds on the current momentum, and continues to implement measures in a targeted way, appropriate to the soil type, catchment setting and nutrient of concern.

Article 29(2) of the European Union (Good Agricultural Practice for Protection of Waters) (GAP) Regulations 2022, as amended, requires the EPA to undertake a review of progress made on implementing these Regulations and to submit a report to the Minister by 1st October 2024, and every four years thereafter. The report includes the results of that review, with recommendations for additional measures to prevent and reduce water pollution from agriculture sources. This report made a number of recommendations in relation to compliance assurance (see Section 4.2), and made recommendations relating to nutrient losses, including that in catchments where excess nitrogen losses are the issue, significant improvements in nitrogen use efficiency are required.

4.2 Regulatory Compliance Assurance

National Agricultural Inspection Programme

The Fifth NAP and implementing GAP Regulations placed additional requirements on the EPA in relation to the implementation of a new National Agricultural Inspection Programme (NAIP)[78], and the oversight of local authority enforcement of the GAP Regulations. This was included as a measure to address a reduction in the number of GAP inspections undertaken by local authorities since 2012, and to promote compliance through the undertaking of inspections and enforcement actions. The NAIP was established in 2023 and included provision for the recruitment of 57 new dedicated agricultural inspectors in local authorities, in addition to the existing 11 full-time equivalents already in place. Also included was a new team within the EPA to implement and oversee the programme, and a new team in LAWPRO to help co-ordinate inspections, data sharing and training. Recruitment and training of new staff commenced in 2023 and continued throughout 2024 and 2025. The inspections are targeted and risk-based with a stronger focus on compliance and follow-up enforcement. They represent a coordinated effort, through targeting of inspections in water bodies identified by the EPA as requiring agricultural measures, using tools such as the FLAG and PIP maps. There was a doubling of the number of farms receiving a full GAP inspection in 2024 when compared with 2023 and 2022, with a target in place of 4,500 farms to be inspected in 2025. An increased rate of enforcement inspections, undertaken in this targeted manner, not only increases the likelihood of identifying issues in at-risk catchments, but an inspection regime also promotes compliance, and it is anticipated that, as the programme grows, the rate of non-compliances being detected will reduce. Actions taken to address non-compliances can also be tracked against improvements in water quality through a feedback loop.

The development of the programme included:

- A risk-based inspection plan.
- Guidance and tools for selecting farms for inspection.

[78] https://www.epa.ie/our-services/compliance--enforcement/support-and-supervision-of-local-authorities/national-agricultural-inspection-programme-naip/

- Templates and guidance for carrying out, recording and reporting on farm inspections.
- Methodology for follow-up and closure on issues detected including promotional, monitoring and enforcement actions.
- Templates and protocols for recording inspections and the outcomes of inspections to support local authorities complying with the GAP Regulations.
- A training programme for all local authorities for the implementation of these guidance and protocols.
- Recommendations on requirements for an ICT system and support for the development of a system.
- Completion of a report to the Minister on progress in implementing the GAP Regulations and recommendations for additional measures necessary to prevent/reduce water pollution from agricultural sources.

Through the NAIP, the EPA's overall strategic approach is to focus on strengthening the level of enforcement to achieve a higher level of compliance and reduce the agricultural pressures on water quality. This includes achieving consistency nationally when addressing non-compliances using various enforcement tools, cross-reporting, and prosecutions to deliver protection and improvement of Ireland's water quality.

Department of Agriculture, Food and the Marine Inspections

In addition to GAP inspections undertaken by local authorities, each year the DAFM undertake three types of on-the-ground field inspections:

i) At least 550 herds under the GAP Regulations on behalf of local authorities.
ii) Full Conditionality inspections, to include the GAP Regulations, on 1% of all farmers who apply to receive CAP payments on areas exceeding 10 hectares, some of which take place on derogation farms.
iii) Full GAP Regulations inspections on 10% of nitrates derogation applicants. This inspection rate increased in 2022 from 5%, in accordance with the European Commission implementing decision granting Ireland a derogation in 2022.

DAFM use a risk-based approach for selecting inspections, which allows inspections to focus on the farms that present the greatest risks to water quality.

In addition, administrative checks are undertaken on all nitrates derogation applicants, checking that they meet the eligibility criteria and all the necessary supporting documentation and fertiliser records have been submitted.

Furthermore, DAFM carries out a 100% administrative check on all herd owners (derogation and non-derogation) with livestock on an annual basis, checking that they have not exceeded the respective stocking rate limit for their holding. This check requires compilation of the total quantity of organic nitrogen (N) for every herd from DAFM's Animal Identification and Movement System (AIM) together with organic N excretion rate data, divided by the declared area of land eligible for nutrients under the Basic Income Support for Sustainability (BISS) Scheme, to arrive at a kg organic N per hectare figure for each herd. Herd owners in breach of their maximum allowable livestock manure limit incur penalties. For non-compliant farmers, the penalty is applied across all EU funded Direct Payments schemes and land based Rural Development Programme/CAP Strategic Plan measures.

4.2.1 Inspection and Enforcement Outcomes

National Agricultural Inspection Programme

EPA data from the National Agricultural Inspection Programme indicates that 2,598 farms received inspections from local authorities under the GAP Regulations in 2024[79]. This figure does not include follow up inspections, inspections undertaken for other reasons, for example in response to a complaint, nor does it include inspections from other bodies, such as DAFM or IFI. The 2024 NAIP data shows a non-compliance rate of 42% in their inspections, however the rate of inspections heretofore has been very low. Of those non-compliances, the significance or potential for impact from 85% was considered low, with 1,484 minor breaches detected, resulting in a compliance notice. Arising from these inspections, there were

[79] https://www.epa.ie/publications/compliance--enforcement/public-authorities/national-agricultural-inspection-programme-naip-summary-report-2024.php

149 cross-reports to DAFM, 129 section notices under either the GAP Regulations or the Water Pollution Act, and four prosecutions taken.

The most common reasons for non-compliance detected in local authority GAP inspections in both 2023 and 2024 were:

- Control of soiled water
- Management of farmyard manure
- Discharge with potential to impact water quality
- Slurry collection and storage

The most common corrective actions requested by the local authorities related to the management of soiled water run-off, be it from farmyard manure, silage effluent or soiled water. In addition to continuing the compliance inspections, the draft Sixth NAP proposes a number of measures to address these pressures, for example it is proposed to provide measures to increase storage capacity on dairy farms, as outlined in Section 5.

Department of Agriculture, Food and the Marine

There is a much lower non-compliance rate among farms inspected by DAFM. The on-farm inspections undertaken by DAFM on behalf of the local authorities, identified that 28% of herds in 2023 and 25% of herds in 2024 had at least one non-compliance breach of the GAP Regulations.

On-farm conditionally inspections undertaken by DAFM in 2023 found 21% of herds in 2023 and 34% of herds in 2024 had at least one non-compliance breach of the GAP Regulations.

Interestingly, notwithstanding higher regulatory obligations, a lower incidence of non-compliance was detected during DAFM inspections on derogation farms, with approximately 11% of derogation farms in 2023 and 21% of derogation farms inspected in 2024, found to be non-compliant. Note, some administrative checks for 2024 are ongoing so this value is subject to change. The outcome of these non-compliances is that the farmer loses their derogation for the year of inspection and

becomes ineligible to apply for derogation the following year. This essentially means a rejection for two years, which is a new rule that was introduced in the Fifth NAP and represents a significant deterrent.

The most common reason for non-compliances found across the three types of inspections by DAFM were farmyard issues and included management of livestock and other organic manures, and management of clean water. While not as prevalent, land management non-compliances included land spreading of organic and chemical fertilisers and ploughing of green covers and buffer strips.

As outlined above, derogation farmers are required to undertake additional measures. Common reasons for non-compliances on derogation farms included control of soiled water, not fencing off watercourses, non-compliant drinking points, exceeding chemical nutrient allowances and poor grassland management.

Following administrative checks across all farmers, the numbers of farmers penalised by DAFM for exceeding the nitrogen limits in 2022 was 2,808.The corresponding figure for 2023 was 2,857 farmers. Checks regarding compliance with stocking rate limits in 2024 are still on-going. It should also be noted that each farmer is entitled to appeal any sanction imposed to the Agricultural Appeals Office, therefore 2024 data for these checks is not yet available.

Inland Fisheries Ireland

In addition to the inspections undertaken by local authorities and DAFM in relation to agricultural impacts on water quality, Inland Fisheries Ireland undertake patrols in the rural environment, and in 2023 undertook 2,010 agricultural inspections[80].

[80] https://www.fisheriesireland.ie/what-we-do/protection/environmental-protection

Recommendations for the National Agricultural Inspection Programme

The EPA Article 29(2) report made a number of recommendations in relation to compliance assurance for the NAIP, including:

- Local authorities should ensure the allocated resources are in place to carry out GAP inspections, to deliver their required NAIP inspections for 2025;
- A stronger emphasis by local authorities on increasing the number of GAP inspections, follow-up compliance checks and enforcement actions;
- Promoting improved compliance levels with the GAP Regulations to improve and protect water quality, and to prevent pollution from agricultural sources, and;
- A number of specific amendments to the GAP Regulations were proposed by the NAIP Working Group based on experience of implementation of the GAP Regulations.

4.3 Overview of the implementation of measures introduced in the Fifth NAP

A summary of the measures introduced in the Fifth NAP is set out in Table 6 below, and it is proposed to continue or expand upon all of these measures in the draft Sixth NAP, with one exception. Shallow cultivation on arable land was introduced under a measure in the Fifth NAP to promote the growth of 'Green Cover on Tillage Ground' in selected counties where significant nitrogen load reductions were required. Built into this measure was a requirement to retain 20-25% uncultivated cover to support seed eating birds during the winter period. However, recent research has highlighted the importance of tillage land to winter farmland birds of conservation concern, in particular Skylark, Linnet and Yellowhammer[81]. It is therefore proposed to remove the existing requirement for shallow cultivation in the draft Sixth NAP, with a commitment to continue the Teagasc research project on the 'Assessment of Green Cover Requirements: Implications for Farmland Birds'. This research project aims to determine the potential effects of a shallow cultivation measure to support water

[81] https://birdwatchireland.ie/app/uploads/2024/02/Cork-Winter-farmland-bird-habitat-associations-report.pdf

quality objectives on farmland birds, with particular reference to winter food availability. The research will assess the quantity and quality of winter stubbles available as a resource for farmland birds and supporting biodiversity. Results derived from this research will inform decision-making in the design of future NAP measures, and integration of NAP measures and broader agri-environment measures to minimise potential trade-offs in delivery of environmental objectives.

Table 6 Summary of the Fifth Nitrates Action Programme Measures

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Registration on National Fertiliser Database (NFD) – to track chemical fertiliser movements from point of import through to end user.	Regulatory	Implemented	• Improved N & P management • Promote the recycling of nutrients on-farm • Improved nutrient use efficiency on farms and support a reduction in fertiliser use in line with targets in Ireland's Climate Action Plan.	The National Fertiliser Database was signed into law on 11 July 2023.
Increased inspection and enforcement	Regulatory	Implemented	• Improved regulatory compliance • Compliance promotion	• Recruitment and retention of LA staff for the NAIP has proven to be challenging, however 54 of 57 local authority

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
			• Reduce N, P and sediment losses • Improved N & P management	inspectors are in place as of the 1 Oct 2025. • Significant increases in number of inspections by local authorities. • Doubling of DAFM's rate of inspection on derogation holdings.
Increased requirements to manage slurry and soiled water storage	Regulatory	Implemented	Reduce loss of N & P, particularly during high-risk times of the year	Closed period for the application of soiled water introduced on dairy farms.
Nutrient excretion rates for dairy cows adjusted	Regulatory	Implemented	Apply current scientific data on N & P excretion by bovine livestock.	Tables 6 and 6a updated in the midterm review under S.I. 42 of 2025.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Nutrient excretion rates of young bovines up to two years of age adjusted	Regulatory	Implemented	Apply current scientific data on N & P excretion by bovine livestock.	Tables 6 and 6a updated in the midterm review under S.I. 42 of 2025.
Reduction in chemical fertiliser N allowances	Regulatory	Implemented	• Reduce N surplus • Promote the efficient use of nutrients.	Reductions for all farmers in 2022. Further reductions for intensive farmers and a new lower limit for extensive farmers introduced in 2025.
Review of the management and oversight of sludges being applied to land	Regulatory	Implemented	• Monitor and manage organic manure movements • Reduce N & P surplus	• A working group was established under the National Technical Implementation Group (NTIG) for the WFD, and

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
				a report completed with recommendations[82]. • 4-day rule for reporting of movements introduced in the midterm review with data sharing taking place between DAFM and local authorities, facilitated through LAWPRO.
Phosphorus build-up in soils based on laboratory results	Regulatory	Implemented	• Promote good soil management ensuring balanced phosphorus content • Reduce P surplus	Important measure in balancing soil fertility and optimising nutrient efficiency.

[82] https://www.catchments.ie/report-of-the-sludges-and-organic-fertilisers-working-group/

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
			• Promote efficient use of nutrients	
Green Cover requirement on tillage ground	Regulatory	Implemented	Reduce nutrient leeching and sediment flows on land. In time, reduce N & P surplus	The requirement for shallow cultivation is proposed to be removed for the Sixth NAP with a commitment to continue and await the outcome of the AgriBirds research.
Reduction in crude protein in concentrate feeds	Regulatory	Implemented	Reduce surplus N in grazing system	Reduced from 15% to 14% for adult cattle at grass and extended to all farmers in the interim review.
Recognition for dairy farmers who opt to	Regulatory	Implemented	Reduce surplus N	Introduced in the interim review.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
manage crude protein across the entire year				
Determination of organic matter content of soils for nutrient management plan	Regulatory	Implemented	• Reduce P surplus • Promote good soil management	The phosphorus fertilisation rate for soils with more than 20% organic matter shall not exceed the amounts permitted for Index 3 soils.
Extended requirements for soil sampling	Regulatory	Implemented	• Develop appropriate nutrient management plan • Support healthy soils • Promote efficient use of nutrients	Introduced incrementally over the Fifth NAP with all farmers above 130 kg N/ha and all arable land now required to take soil samples.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Enhanced management of grazing land	Regulatory	Implemented	• Promote efficient use and distribution of nutrients within a holding • Reduce N & P surplus	• Reduced allowances for commonage land of 50 kg livestock manure N/hectare • No chemical fertiliser allowance permitted for commonage.
Review and update technical tables to align with current scientific data	Regulatory	Implemented	• Promote efficient nutrient use and management • Reduce N & P surplus	Tables 6, 6a, 7, 11, 12, 13a, as well as clarifying footnotes throughout, updated via amendments to the Regulations over the course of the Fifth NAP, in line with latest research.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Extended requirement to use Low Emission Slurry Spreading equipment	Regulatory	Implemented	• Promote efficient nutrient use • Reduce N & P surplus	LESS now applies to all farms above 100 kgN/ha, as well as the application of pig slurry.
Reduction in the maximum stocking rate based on best available Water Framework Directive dataset (applies to derogation farms)	Regulatory	Implemented	Reduce N & P surplus	Reduction from 250 kgN/ha to 220 kgN/ha now applies to most derogation farms following the interim review.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Mitigation measures to prevent overstocking of land areas (applies to derogation farms)	Regulatory	Implemented	Reduce N & P surplus	• Introduced in the interim review. • Land greater than 30km from the farming hub requires supporting justification if it is going to benefit from the higher allowances permitted under the nitrates derogation.
Increase clover grown in grass swards	Regulatory	Implemented	Reduce chemical N inputs and enable stable biological fixation of N to supply grass crop needs	Requirement to include clover seed when reseeding perennial rye grass swards, extended to all farmers as part of the interim review.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Restriction on the use of unprotected urea	Regulatory	Implemented	• Reduce ammonia emissions and increase nitrogen use efficiency • Reduce N surplus	A restriction on the use of unprotected urea in granular form now applies since 15 September 2025.
Teagasc-led "Better Farming for Water" Campaign[83]	Non-regulatory	In progress	• Encourage and implement best practice in farm management • Reduce nutrient surplus	Launched and engagement is ongoing, including a new webpage.
Review of the Agricultural Sustainability Support and Advisory Programme (ASSAP)	Non-regulatory	In progress	• Encourage and implement best practice in farm management • Reduce nutrient surplus	An independent review was completed at the end of 2021, which made 10 recommendations that have been progressed over the course of the Fifth NAP.

[83] https://teagasc.ie/environment/water-quality/better-farming-for-water/

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Farming for Water European Innovation Partnership supporting targeted actions above regulatory requirements	Non-regulatory	In progress	• Encourage and implement best practice in farm management • Reduce nutrient surplus Improve nutrient and farm management	This EIP started in March 2024 and aims to engage 15,000 farmers to implement targeted measures to address water quality issues. This project is ongoing.
Financial supports for improving organic manure storage capacity	Non-regulatory	In progress	• Reduce N &P surplus • Support effective nutrient management planning in context of changing climate	Research undertaken by Teagasc under the Fifth NAP has informed proposed measures relating to storage capacity for the draft Sixth NAP.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Scoping out Nutrient Balance and Animal Feed sales/import database	Non-regulatory	In progress	• Reduce N & P surplus • Monitor nutrient inputs • Support effective nutrient management planning	Nutrient balance is being introduced through AgNav, which utilises sustainability data collected during Bord Bia audits. The idea of developing an animal feed sales/import database was considered by DAFM. This element is not progressing at this stage due to the significant resources that would be required and the need to use those resources to address other matters that may have a more direct beneficial impact on water quality.

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
Multi-species swards encouraged	Non-regulatory	In progress	Reduce N & P surplus	Research inclusion and management of multi-species swards on-going.
Modelling the Impacts of Agriculture on Water Quality	Non-regulatory	In-progress	• Enhance the understanding and scale of impacts • Develop further targeted measures to protect and restore water quality	• EPA report “Evidence-based targeting of agricultural measures to reduce nitrogen in catchments to achieve water quality objectives 2020 – 2024” published August 2025. • DAFM have formally requested that Teagasc commence modelling work, which is being

Measure	Regulatory / Non-regulatory	Implemented/In Progress	Aim of Measure	Comment
				undertaken jointly with EPA.
Pilot Project to inform development of the Sixth NAP	Non-regulatory	In-progress	Develop a collaborative, integrated catchment management approach.	A pilot project has been established in Lady's Island Lake and is led by Wexford County Council and supported by State agencies, DHLGH, DAFM, LAWPRO and industry.

4.4 Measures brought forward for the draft Sixth NAP

The Fifth NAP forms the foundation for the development of the Sixth NAP. It is clear that more needs to be done to reduce nutrient losses to water and, in particular, to reduce the nitrogen losses in the south and south east of the country. Section 5 provides an overview of the proposed measures, which includes measures proposed to strengthen existing measures, as well as a number of new measures.

In terms of meeting the Water Framework Directive objectives, the Water Action Plan (WAP) 2024 sets out over 150 measures including a combination of 12 statutory and non-statutory measures for the agricultural sector. These are to be delivered by a number of both governmental and non-governmental stakeholders, including the development of sectoral action work plans and catchment management work plans. The NAP forms an important component of these measures in delivering water quality protection and improvement, but water quality objectives will only be achieved when the full suite of WAP measures are implemented.

5 Measures Introduced under the draft Sixth Nitrates Action Programme

The draft Sixth NAP has been developed to build on the current momentum and engagement that exists across Ireland's agri-food sector to protect and improve water quality. The draft Sixth NAP outlines how the State intends to deliver agricultural related water quality improvements through the correct balance of regulation, knowledge transfer/awareness raising and incentivisation, and through the implementation of targeted measures that are grounded in science. While the number of proposed new measures under the draft Sixth NAP may be considered fewer than in previous NAPs, these measures have been developed to target key issues in terms of either reducing nutrient loads impacting water quality, or supporting the drive to gather a stronger evidence base to determine the spatial extent of nutrient application, which in turn will support the development of future measures. They are also in addition to those measures being carried forward and retained from the Fifth NAP.

Ireland has informed the European Commission of its intention to apply for a derogation and discussions are ongoing at EU level. The derogation would allow certain farmers to continue applying in excess of 170kg of livestock manure nitrogen per hectare from 2026, subject to approval of an application by DAFM, and adherence to a stricter set of environmental conditions that contribute to the achievement of the Nitrates Directive's objectives. Therefore, measures related to the derogation have also been included in the draft Sixth NAP. It is proposed that some of the measures for the draft Sixth NAP will only be mandatory for derogation farmers, while other measures will apply more broadly, as appropriate.

The proposed European Union (Good Agricultural Practice for the Protection of Waters) Regulations 2026 may be referred to for further detail (cited as the draft GAP Regulations) along with the following Sections 5.1 and 5.2.

5.1 Regulatory measures being considered

- **Nutrient balance at individual farm level (know your number).**

A farm-gate nutrient balance can provide an assessment of the overall nutrient status (Nitrogen and Phosphorus) on the farm. The numeric nutrient balance is generated by calculating the difference between the nutrients that come into the farm as inputs (which may be in the form of fertilisers, animal feed, purchased livestock), versus those that leave the farm as outputs, (which may be in the form of crops, meat or dairy produce).

Different farming scenarios can result in different nutrient balance outcomes and hence differences in the level of nutrients that remain on the farm and in the landscape that can be lost to water. Therefore, it is important that farmers know their nutrient balance, to help them minimise the loss of valuable nutrients from the farming system to the environment. This is particularly relevant to those farming at higher stocking rates, where there is a risk of a higher surplus if the overall farm outputs are comparatively lower to that of the inputs.

The requirement to know a farm's nutrient balance will be mandatory for derogation farms and encouraged for other farms, and supported by training, advice and tools. These tools will include AgNav, which is a new, free, online sustainability platform developed by Teagasc, the Irish Cattle Breeding Federation (ICBF) and Bord Bia,

with support from DAFM. It provides farmers with accurate and verifiable data to support on-farm decision making to help meet agriculture's climate action and water quality targets.

Aim of the Measure: Aid better decision making for on-farm nutrient management. This measure will enable farmers to identify and prevent excessive surplus nutrients being applied and/or retained within the farm that may result in nutrient losses. The measure also has potential to provide for better nutrient utilisation allowing for both an environmental benefit and cost savings for farmers.

- **Improved nutrient distribution on fragmented farms**

On fragmented farms, milking cows predominantly graze on the land that can be accessed from the milking parlour. As a result, these lands may receive a higher proportion of the farm's livestock manure nitrogen while cows are at grass and/or in the form of slurry due to their close proximity to the farmyard.

On fragmented dairy farms and depending on soil fertility status, maximising nutrient use efficiency is best achieved by applying the cattle slurry to the area used for silage conservation.

While a holding's nutrient allowance is based on the total land area being farmed, for practical and economic reasons, the nutrient distribution on fragmented farms might not extend to the outblocks. If this results in a significantly higher concentration of nutrients being spread on the land closer to the farmyard, or the area typically referred to as the milking platform, a lower N allowance will be applied if the farmer cannot demonstrate that livestock manure is being spread across the farm holding. Details about this measure are set out in Article 17 of the draft GAP Regulations.

Aim of the Measure: Improved on-farm nutrient management, to prevent excessive and surplus nutrients being applied to certain areas, with the subsequent risk of nutrient loss.

- **Increased slurry and soiled water storage capacity requirements**

Accounting for advancements made in dairy breeding and associated farming systems, it is acknowledged that the volumes of slurry and soiled water produced by

the dairy cow have increased compared to values set when Ireland's First NAP was introduced in 2006.

As committed to in the Fifth NAP, DAFM commissioned Teagasc to undertake a survey to assess the volumes of slurry and soiled water produced on 100 representative dairy farms nationally. The survey was conducted over a 21-month period from July 2023 to March 2025 and the findings were published in September 2025[84].

The survey highlights the volume of slurry produced by the average dairy cow in Ireland is 21% higher than existing regulatory values. This indicates that the slurry storage capacity requirements for those holdings with dairy cows needs to increase. It is proposed that the volume of slurry produced from a dairy cow will change to 0.40 m^3 per week, an increase from previously applied rate of 0.33 m^3 per week and as set out in the technical tables under Schedule 2 of the draft GAP Regulations.

Compared to the existing value, the volume of soiled water produced from a dairy cow has increased by 43%. It is proposed to be set as 0.30 m^3 per cow per week, instead of the current 0.21 m^3 per cow per week. However as set out in Article 9 of the draft GAP Regulations, this is proposed to be based on the number of cows being milked at critical times of year rather than theoretical peak cow numbers at any time during the year.

Unlike previous regulations, the rate of soiled water produced per cow will be added as a new technical table to the draft GAP Regulations. Soiled water storage capacity requirements for milk producers and non-milk producers are outlined under Article 9 of the draft GAP Regulations.

It should be noted that the published survey results for soiled water present the levels of soiled water produced per month per cow, based on the peak number of cows being milked in the herd across the year. Herds surveyed were predominantly spring calving herds. In such herds cows are dried off in the winter and stop producing milk until calving takes place, therefore if volumes of soiled water

[84] https://teagasc.ie/wp-content/uploads/uploads/media/website/publications/2025/Slurry-and-dairy-soiled-water-volume-estimates.pdf

produced are divided by the peak cow number the levels will be lower in the winter months.

To account for the drying off period for cows, and to reflect a more accurate volume of soiled water collected based on the number of cows that were producing milk at the time, the average volume of soiled water per cow to be brought forward under the regulations was based on re-calculated data from the Teagasc research, which excluded the winter months of November – February where most cows are likely to be dried off.

The structural changes in terms of increased slurry and soiled water storage on dairy farms will require planning, on-farm investment and construction. Therefore, to facilitate a necessary lead in time, the required change in the volume of slurry and soiled water produced by a dairy cow is proposed to come into effect from 1 October 2028.

Subject to the available budget, the construction of additional storage will be supported through grant aid provided by DAFM. Construction of new standalone manure storage facilities meeting certain conditions is intended to be facilitated through an exemption in the Planning and Development Regulations, which is going through the legislative process at present.

Aim of the Measure: Improve on-farm nutrient storage and management, to ensure sufficient storage is in place for the nutrients being produced on the farm. The measure reduces the risk of point source losses and reduces the risk of nutrient loss from the land, allowing nutrients to be applied at the right time and the right rate when growing crops require them. Optimising organic manure management and land application should also allow farmers to reduce their reliance on chemical nitrogen.

- **Chemical nitrogen allowances for grassland and arable crops**

The Fifth NAP and Fifth NAP Additional Measures brought about a reduction in the chemical nitrogen allowances. Teagasc research published in September 2025[85] has shown that in the absence of improved overall soil fertility as well as improved clover

[85] https://teagasc.ie/wp-content/uploads/uploads/media/website/publications/2025/An-environmental-and-economic-assessment-on-the-impact-of-possible-reductions-in-the-maximum-chemical-nitrogen-allowances-for-all-grassland-stocking-rates.pdf

establishment and management techniques, further reductions in chemical nitrogen allowances for grassland will likely give rise to forage deficits on more intensively stocked farms. This would lead to an associated risk of increasing reliance on imported feed, which would be environmentally damaging. To avoid such unintended consequences, it is not proposed to apply further reductions in chemical nitrogen allowances under the Sixth NAP, however as outlined in the Teagasc research, an adapted silage production allowance (available nitrogen and phosphorus) for farms operating at or below 85 kg organic N/ha will be provided for (see Article 17 of the draft GAP Regulations).

Aim of the Measure: To match nitrogen and phosphorus application with crop requirements in order to reduce the risk of surplus nutrients remaining in the soil, or declines in soil fertility which could give rise to a higher nitrogen balance.

- **Timing of nutrient application for arable crops**

The timing of the application of nutrients to arable land will be restricted to better align with crop demands in catchments where the greatest nutrient load reduction is required to meet Water Framework Directive objectives.

With the exception of arable land being sown to *brassica spp.* or grass crops by 15 September, post-harvest application of organic fertiliser in the form of sewage sludge or biosolid derived from the treatment of sewage sludge, is proposed to be prohibited in the Barrow Catchment and the Slaney & Wexford Harbour Catchment. To allow an adjustment period to provide additional storage, or to identify alternative destinations for the sewage sludge currently applied to arable land in these catchments in the autumn period, this measure is proposed to apply with effect from 1 January 2028 as set out in Article 17 of the draft GAP Regulations.

Where other manures are applied nationally to arable land in the autumn, they will be required to be incorporated into the soil and have a crop sown within 21 days as set out in Article 17 of the draft GAP Regulations.

Aim of the Measure: To reduce the loss of nutrients from arable land.

- **Expansion of DAFM's organic nutrient movement database**

In January 2025, DAFM introduced a new online register for the notification of the export of organic nutrients from farm holdings within four days of the export. This facilitates inspection of spread lands on receiving holdings to verify that the movement of organic nutrient has taken place.

Following a recommendation from the Water Framework Directive (WFD) National Technical Implementation Group sub-group chaired by the EPA on the Management of Sludge, Biosolids and Organic Manures, it is proposed that this register will now be extended by DAFM to include the export of all organic manures that are being applied to agricultural land, regardless of the source. Where possible, sampling of spread lands will be undertaken to verify the validity of soil samples submitted to support spread lands, however this will be dependent on the timing of the sampling in relation to the original samples and soil conditions.

Aim of the Measure: Encourage best practice in terms of nutrient use and reduce the risk of over-application of nutrients. This measure will also enable risk-based inspections through improved tracking and management of organic nutrient movements.

- **Continued and increased focus on compliance and enforcement, and the National Agricultural Inspection Programme**

Currently both DAFM and the local authorities undertake farm inspections under the Good Agricultural Practice for the Protection of Water Regulations, the latter overseen by the EPA National Agricultural Inspection Programme.

Training has and is being provided to local authority inspectors, which has been developed, and is being delivered, with DAFM input. The approach to inspections by both DAFM and the local authorities will be further aligned and standardised, using a strengthened risk-based approach. A new certified training course was introduced for local authority inspectors in 2025, and there will be ongoing training and upskilling of inspectors throughout the draft Sixth NAP, in line with new recruitment, new requirements and new research.

The establishment of the NAIP included the recruitment of 57 new, dedicated farm inspectors within the local authorities to undertake inspections, however the

contracts are currently to the end of 2027, in line with the third cycle River Basin Management Plan. It is proposed that consideration should be given to making these staff permanent, to ensure consistency of enforcement, retention of skilled staff and to ensure the longevity of the Programme.

A review of the NAIP should be undertaken to inform how the programme may be refined or developed further in the future.

Aim of the Measure: Increased compliance enforcement and promotion leading to better on-farm practice and understanding.

- **Overall review of the GAP Regulations**

The GAP Regulations have developed over several iterations since 2006, and as a result they have become unwieldly and inaccessible to many. An overall review of the GAP Regulations has taken place in order to simplify the Regulations, streamline them where possible and make them more accessible while maintaining the protections required for water. This is evident within the draft GAP Regulations.

Aim of the Measure: Ensure clarity of requirements.

5.2 Non-regulatory measures being considered

- **Expansion of the Agricultural Sustainability Support and Advisory Programme (ASSAP)**

ASSAP is a free, confidential support and advisory service provided to farmers to improve water quality. The service was introduced in late 2018, and is co-funded by the dairy co-ops, DHLGH and DAFM. This cross-collaborative approach between the agriculture sector and the government departments illustrates the importance and buy-in from all stakeholders. Moreover, the commitment from the agriculture sector to the programme has been underlined by the dairy co-ops providing support for additional ASSAP advisers in recent years, with the number of ASSAP advisers they support more than trebling since the programme commenced. Furthermore, a number of meat processers have also recently started to engage ASSAP advisers. The draft Sixth NAP proposes to continue and expand the programme with additional Government funded resources based on a business case that has been received from Teagasc.

Aim of the Measure: Enabling targeted on-farm advice, knowledge transfer and better informed decisions by farmers with respect to the protection of waters on their own farms and within their own water bodies.

- **Continuation of Farming for Water European Innovation Partnership (EIP) to the end of 2029**

  The Farming for Water European Innovation Partnership is a €60m project with the purpose of supporting the delivery of the objectives of the third cycle River Basin Management Plan for Ireland, (Water Action Plan 2024).

  To date over 4,500 farmers have applied to participate in this project, which supports the implementation of targeted water quality measures above regulatory requirements through the provision of agricultural and scientific advice, along with financial incentives. The intention is to engage up to 15,000 farmers.

  This EIP is currently funded to the end of 2027. The provision of funding for this EIP will be extended for the lifetime of the Sixth NAP, in order to continue the support for the implementation of these targeted additional measures.

  Aim of the Measure: To incentivise farmers to adopt targeted measures specific to their own farm situation that go beyond minimum regulatory requirements.

- **Knowledge transfer and awareness raising for both farmers and farm advisers**

  The Teagasc Better Farming for Water Campaign was introduced in the Fifth NAP, to raise awareness of water quality issues among the farming community. It is proposed that this high profile national campaign will be continued throughout the Sixth NAP.

  It is proposed that a water quality Knowledge Transfer (KT) programme will be established under the Sixth NAP to build on the Better Farming for Water Campaign, which will target farmers, farm advisers and the wider farm advisory service. Participation in this training will be mandatory for derogation farmers and encouraged for non-derogation farmers.

  This programme will involve the roll-out of mandatory training for all accredited Farm Advisory Service (FAS) Advisers in Q1 of 2026. This will be further

complemented by optional training later in 2026 for those FAS Advisers who wish to receive such further training. This optional further training will be mandatory for advisers who wish to provide training to derogation farmers under the Sixth NAP.

With the objective of having a consistency of messaging and improved overall awareness around actions to reduce agriculture's impact on water quality, DAFM will also work with the agri-food industry to provide training regarding water quality for professional advisers who service the farming industry but that are non-FAS accredited.

In addition, DAFM will work with institutions providing third level courses in agriculture and/or agricultural science with a view to ensuring the next generation of farmers and their advisers are fully aware of best practice to minimise potential risks to water arising from agricultural activity.

Working with LAWPRO and Teagasc, DAFM will also rollout a "know your local water quality" initiative to all farmers. This will provide simple messages about water quality in each farmer's own local area along with targeted simple steps they can take on their own holding to minimise the risks to water quality.

Aim of the Measure: Improving awareness and knowledge base amongst farmers and advisers.

- **Research on Mehlich soil analysis to better quantify plant available nutrients**

DAFM will commission a review on Mehlich soil analysis, and development of an associated soil index system to better quantify and understand plant available nutrients.

This multi-year research project will be advertised immediately on commencement of the Sixth NAP. This measure was included in the Fifth NAP and DAFM issued a research call, but no research organisation was in a position to respond due to resource constraints in at least some cases. It is understood that these resource constraints are no longer an issue.

Aim of the Measure: Reduced nutrient losses through more appropriate nutrient application rates that better align with crop needs based on the true level of nutrients available within the soil.

- **Research on cover crop establishment**

Cover crops have a strong role in mitigating nitrogen loss, sediment and run-off from arable land. However, there is a requirement to examine alternative ways to establish these crops to maximise the contribution they can make through timelier and more cost-effective establishment. The Sixth NAP will build on research ongoing in this area.

Aim of Measure: Mitigating nitrogen loss, sediment and run-off from arable land through optimum use of cover crops.

- **Continuation of Teagasc's Agricultural Catchments Programme**

The Teagasc Agricultural Catchments Programme (ACP) is a world leader in research relating to agriculture and water quality. This programme is currently funded to the end of 2027, however this will be extended and strengthened to run at least until the end of 2029, in line with the timelines of the Sixth NAP. The programme will examine the impact of agriculture, and in particular the derogation, on water quality. In addition, Teagasc will develop a long-term strategy for the management of the ACP.

Aim of Measure: Ensuring ongoing improvements in best available science and understanding of factors impacting water quality from an agricultural perspective.

Table 7. Summary of draft Sixth NAP measures

Measure	Regulatory / Non-regulatory	Aim of the Measure
Nutrient balance at individual farm level (know your number)	Regulatory (Mandatory for derogation farms, encouraged for all farms)	Aid better decision making for on-farm nutrient management. This measure will enable farmers to identify and prevent excessive surplus nutrients being applied and/or retained within the farm that may result nutrient losses. The measure also has potential to provide for better nutrient utilisation allowing for both an environmental benefit and cost savings for farmers.
Improved nutrient distribution on fragmented farms	Regulatory	Improved on-farm nutrient management, to prevent excessive and surplus nutrients being applied to certain areas, with the subsequent risk of nutrient loss.
Increased slurry and soiled water storage capacity requirements	Regulatory	Improve on-farm nutrient storage and management, to ensure sufficient storage is in place for the nutrients being produced on the farm. The measure reduces the risk of point source losses and reduces the risk of nutrient loss from the land, allowing nutrients to be applied at the right time and the right rate when growing crops require them. Optimising organic

Measure	Regulatory / Non-regulatory	Aim of the Measure
		manure management and land application should also allow farmers reduce their reliance on chemical nitrogen.
Chemical nitrogen allowances for grassland	Regulatory	To match nitrogen and phosphorus application with crop requirements to reduce the risk of surplus nutrients remaining in the soil or declines in soil fertility which could give rise to a higher nitrogen balance.
Timing of nutrient application for arable crops	Regulatory	To reduce the loss of nutrients from arable land.
Expansion of DAFM's organic nutrient movement database	Regulatory	Encourage best practice in terms of nutrient use and reduce the risk of over-application of nutrients. This measure will also enable risk-based inspections through improved tracking and management of organic nutrient movements.
Continued and increased focus on compliance and enforcement, and the National Agricultural Inspection Programme	Regulatory	Increased compliance enforcement and promotion leading to better on-farm practice and understanding.

Measure	Regulatory / Non-regulatory	Aim of the Measure
Overall review of the GAP Regulations	Regulatory	Ensure clarity of requirements.
Expansion of the Agricultural Sustainability Support and Advisory Programme (ASSAP)	Non-regulatory	Enabling targeted on-farm advice, knowledge transfer and better informed decisions by farmers with respect to the protection of waters on their own farms and within their own water bodies.
Continuation of Farming for Water European Innovation Partnership (EIP) to the end of 2029	Non-regulatory	To incentive farmers to adopt targeted measures specific to their own farm situation that go beyond minimum regulatory requirements.
Knowledge transfer and awareness raising for both farmers and farm advisers	Non-regulatory	Improving awareness and knowledge base amongst farmer and advisers.
Research on Mehlich soil analysis to better quantify plant available nutrients	Non-regulatory	Reduced nutrient losses through more appropriate nutrient application rates that better align with crop needs based on the true level of nutrients available within the soil.

Measure	Regulatory / Non-regulatory	Aim of the Measure
Research on cover crop establishment	Non-regulatory	Mitigating nitrogen loss, sediment loss and run-off from arable land through optimum use of cover crops.
Continuation of Teagasc's Agricultural Catchments Programme	Non-regulatory	Ensuring ongoing improvements in best available science and understanding of factors impacting water quality from an agricultural perspective.

6 Have your say

The Minister now invites members of the public to make submissions, observations and comments on the draft Sixth Nitrates Action Programme during the period 28 October 2025 to 01 December 2025. Submissions can be made either by email to WAUConsultation@housing.gov.ie or by post to:

Nitrates Action Programme Public Consultation,

Room 2.13, Department of Housing, Local Government and Heritage,

Custom House,

Dublin, D01 W6X0

Hard copies of the draft Sixth Nitrates Action Programme are available for public inspection at the Department of Housing, Local Government and Heritage offices, Custom House, Dublin, D01 W6X0 during office hours (9:00am to 5:00pm Monday to Friday, excluding public holidays) during the period from 28 October 2025 to 1 December 2025. If you wish to view the documents in person, please email WAUConsultation@housing.gov.ie to make an appointment.

The associated Strategic Environmental Assessment (SEA) and Natura Impact Statement (NIS) consultations will be launched separately to this consultation, and will run in parallel to each other. The Water Advisory Unit of the DHLGH is the lead for the SEA, and the Ecological Assessment Unit of the National Parks and Wildlife Service will lead on the consultation for the NIS.

Note, the consultation period for the draft Sixth Nitrates Action Programme may be extended to align with the SEA consultation period.

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