



475 Antrim Road
Belfast
BT15 3DA

T: 028 9037 0222
F: 028 90371231
E: info@ufuhq.com
W: www.ufuni.org

Integrated Catchment Planning
NIEA Water Management Unit
17 Antrim Road
Lisburn
Tonagh
BT28 3AL

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Dear Sir or Madam

CONSULTATION ON SIGNIFICANT WATER MANAGEMENT ISSUES 2025

Thank you for the opportunity to comment on the above consultation. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,500 farming families from all sectors across all of NI.

While we recognise that DAERA are trying to improve the accuracy of their consultation by extending this to all local water bodies, we do not have the capacity to check the accuracy of the information presented in the annex to the consultation document for each Local Management Area and therefore we have provided a generic high-level response.

Please find outlined below the UFU's full response to this consultation document.

I trust that you will fully consider the points highlighted. If you wish to discuss further, please do not hesitate to contact me.

Yours faithfully

AILEEN LAWSON
Assistant Policy Manager



RESPONSE TO THE CONSULTATION ON SIGNIFICANT WATER MANAGEMENT ISSUES

Question 1: Do you agree with the significant water management issues identified?

The Ulster Farmers' Union recognises that the consultation document highlights a range of pressures impacting water quality, including agriculture, wastewater, septic tanks, and other anthropogenic sources. However, the UFU has significant concerns regarding the balance and presentation of these pressures within the document.

The UFU are concerned that the DAERA/NIEA analysis may over-emphasise agriculture relative to other key pressures, particularly:

- Wastewater infrastructure deficiencies
- Combined sewer overflows
- Poorly managed or failing septic tanks

Evidence shows that multiple sectors contribute to water quality pressures, and it is essential that the final River Basin Management Plan reflects this accurately. Furthermore, the report does not sufficiently acknowledge the progress made by the agricultural sector, including investment and improved practices over the years and the legacy nature of some pollutants (e.g. phosphorus), which will continue to affect water quality regardless of current actions.

The UFU is concerned that the document risks over-emphasising agriculture relative to other sectors, many of which remain under-invested in and under-regulated in comparison.

While UFU partially agrees with the issues identified, in the apparent absence of sufficient real data and with the reliance on modelling and mapping of catchments, this results in the relative weighting of pressures being unbalanced. There must be a fair and evidence-based representation of all contributing sectors to properly reflect the condition and source of nutrients and other pollutants in each waterway.

Question 2: Are there any additional significant water management issues that should be considered?

The UFU considers that several key issues require greater emphasis and recognition within the report.

There remains significant deficiencies in wastewater infrastructure, including untreated or partially treated discharges and combined sewer overflows. These issues continue to have a major impact on water quality and must be addressed through sustained public investment. More robust widespread monitoring is required to accurately determine the impact of wastewater on water quality throughout Northern Ireland. The information provided in relation to discharge consents cannot be taken as

representative of the volume of sewage and nutrients that are discharged directly into waterways and real time monitoring is required for a more accurate account.

The UFU has consistently highlighted that septic tanks can be a significant contributor to pollution in rural catchments and that many systems are poorly maintained and inadequately regulated. There is a clear need for better data on septic tanks, improved enforcement, public education and if required support for upgrades.

The impact of historical phosphorus accumulation is a significant issue that is not sufficiently emphasised. This legacy effect continues to influence water quality outcomes particularly in Lough Neagh and cannot be addressed through short-term regulatory changes targeting current farming practices.

Farmers across Northern Ireland have experienced increasing flooding incidents and impacts from poor river maintenance and flow management. This contributes to sediment and nutrient movement and results in damage to productive agricultural land.

Illegal dumping and littering present a growing problem in rural areas which impacts both water quality and farm businesses.

Invasive species are acknowledged but this must be tackled at a catchment scale rather than at landowner/farm level to have any real impact.

Question 3: Do you agree with the factors contributing to these issues?

The UFU acknowledges that human activity is a key driver of water quality pressures. However, the Union has concerns regarding how these factors have been presented.

While agriculture does contribute to water quality issues it is already subject to extensive regulation, significantly the Nutrients Action Programme (NAP), IPPC and cross-compliance requirements. The UFU is concerned that agriculture is too readily identified as the primary or default source, without sufficient consideration of other factors.

Failures and underinvestment in NI's wastewater infrastructure and sewer systems represent a significant systemic pressure that needs to be better quantified and regulated.

There is a perception among farmers that enforcement is more stringent within agriculture and other sectors, particularly domestic and urban sources, are less consistently regulated. This creates concerns regarding fairness and proportionality.

The UFU partially agrees with the factors identified but stresses that a more balanced assessment is required and greater recognition must be given to non-agricultural sources and environmental conditions

Question 4: What additional evidence or information should be used to better understand these issues?

The UFU strongly believes that improved data and evidence are essential to ensure that measures are targeted, proportionate, and effective.

There is a clear need for enhanced real-time monitoring of water quality and more detailed catchment-level data. This would allow better identification of pollution sources, source apportionment and more targeted and effective interventions.

Improved methodologies are required to accurately distinguish between agricultural, wastewater and sewage, septic tank and industrial sources. This is essential to avoid misattribution of pollution and disproportionate regulatory responses

Soil Nutrient Health Scheme information will support more precision-based approaches and identification of high-risk areas where voluntary schemes could be targeted.

Before introducing additional regulation, there must be a comprehensive review of existing policies, to ensure that successful measures are built upon while ineffective or duplicative measures are avoided. Effective implementation and enforcement is also crucial before new regulation is adopted. The UFU also highlights the need for fully assessing the economic impact on businesses. Failure to do so risks undermining farm viability and reducing the sustainability of the agricultural sector

Evidence from catchment partnerships, pilot schemes and advisory programmes demonstrates that collaborative approaches deliver positive outcomes and should be prioritised.

A stronger evidence base is required to ensure fairness across sectors, support proportionate decision-making to deliver meaningful environmental improvements.