

Freedom of Information (FOI) Act & Environmental Information Regulations (EIR) Disclosure Log 2023/24 (Quarters 1-4 - April 2023 – March 2024)

Information released: 17 April 2024, re-released February 2025

Date o	f Request / Information Requested	Date of Response / Response
Refere	nce: AFBIFOI20230501	Date of Response: 26 May 2023
Date o	f Request: 02 May 2023	The following response was provided:
The fo	llowing information was requested:	I am writing to advise that the Institute has completed its search and can confirm that we hold information relating to most elements of your request.
2.	Please provide details of the number of Grievances brought by AFBI staff during the last 5 years. Of those Grievances brought by AFBI Staff during the last 5 years please provide details of the number which relate to either discrimination or equal pay claims/issues. Please provide details of the number of equal pay or discrimination claims settled by AFBI in the last 5 years?	This letter uses initialisms as shorthand for the larger AFBI organizational structures known as divisions. These are Finance and Corporate Affairs Division (FCAD), Environment and Marine Science Division (EMSD), Sustainable Agri-Food Science Division (SAFSD) and Veterinary Science Division (VSD).
4.	In the last 5 years how many AFBI staff have asked for their job to be evaluated?	For all tables please refer to our <u>supplementary document</u> .
	Of those requests for evaluation of their job by AFBI staff in the last 5 years how many of such requests have been granted (ie the role has been re-evaluated)? Of those number of roles/jobs which have been re-evaluated in the	Information relating to your questions 1-6 is set out in <u>Table 1</u> . In question 7 you ask how many members of permanent and/or agency staff are currently employed in certain specified AFBI business areas. The
	last 5 years how many have resulted in the role's grade being changed/re-graded? How many members of permanent and/or agency staff are currently	In Questions 8 and 9 you ask for information on recruitment numbers since 1
,,	employed in the following AFBI areas: (i) Finance (ii) HR	September 2022. The figures requested are set out in <u>Table 3</u> .



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- (iii) Projects
- (iv) Health & Safety
- (v) Facilities
- (vi) Governance
- 8. Since 1 September, 2022 to date how many members of staff have been recruited by AFBI?
- 9. Of the total number of staff who have been recruited by AFBI since 1 September, 2022 to date how many are;
 - (i) permanent staff; and
 - (ii) agency staff.
- 10. Of the total number of staff who have been recruited by AFBI since 1 September, 2022 to date please identify the number of staff recruited by reference to the AFBI branch into which they have been recruited.
- 11. Of the total number of recruitment exercises undertaken by AFBI since 1 September, 2022 to date (whether or not the recruitment exercise led to the appointment of a candidate) how many of them were actioned through:
 - (i) An external recruitment agency (ie quicker); and
 - (ii) HR Connect
- 12. Of the total number of recruitment exercises undertaken by AFBI since 1 September 2022 to date (whether or not leading to any appointment of any candidate) please identify the AFBI branch which used:
 - (i) An external recruitment agency; and
 - (ii) HR Connect.
- 13. Please provide the justification for the decision to initially attempt to recruit a Research Development Manager through the external recruitment agency route and not through HR Connect.

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In Question 10, you ask us to identify the number of staff recruited since 1 September 2022 by reference to the AFBI branch into which they have been recruited. This information with respect to permanent staff is set out in <u>Table 4</u>.

Our records are not held in a manner which allows us to collate the equivalent information with respect to agency staff.

In Question 11 you ask for information about how many AFBI recruitment exercises since 1 September, 2022 were actioned through (i) an external recruitment agency and (ii) the HR Connect process. The respective figures are (i) 14 and (ii) 32.

In your Question 12, you ask which AFBI branches participated in recruitment exercises since 1 September 2022 using (i) an external recruitment agency and (ii) the HR Connect process. The information requested is set out in Tables 5 to 8 below. It should be noted that more than one branch may have participated in the same recruitment exercise, and that equally, the same branch may have participated in multiple recruitment exercises. Therefore the figures in the tables below will not tally directly with those supplied in response to Question 11.

I consider that the requests at points 13, 14 and 15 of your email are requests for opinions or explanations rather than for recorded information, and so fall outside the scope of the Freedom of Information Act 2000. You may wish to address these by separate correspondence to the head of AFBI People and Culture Branch at the above address.



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Date of Response: 15 September 2023
The following response was provided:
The work referred to was one component of AFBI's annual juvenile fish surveys of Lough Neagh, undertaken for DAERA Inland Fisheries.
Results from all our survey sites within the Lough will be compiled at the end
of the sampling season and reported to DAERA at the end of the financial year. The vessel used in the survey was hired from the Lough Neagh Fishermen's
Cooperative Society. AFBI undertook bait net trawls during this survey. Payments were made for the last three financial years to Lough Neagh Fishermen's Co-Operative Society in Antrim as below, for hire of vessel for use in survey and water sampling activities. 2020-2021 - £7,759.20 2021-2022 - £7,560.00 2022-2023 - £16,164.00 2023-current - £4,326.00



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Date of Request: 21 August 2023	The following response was provided:
The following information was requested:	I am writing to advise that the Institute has completed its search and can confirm that we hold the information requested. Please see the table of
Under EIR legislation could you please provide the following information in electronic format.	queries and responses attached to this letter as Annex A, a summary of information relating to the model's margin of error attached as Annex B, background material relating to research activities on mussels in Carlingford
 Margin of error for the SMILE model used for the new aquaculture sites proposal in Mill Bay. 	Lough at Annexes C and D, and a copy of the draft Section 14 application attached as Annex E.
 What was the brief given by DAERA to AFBI for the reports done in relation to the new aquaculture sites proposal in Mill Bay? Please include all paperwork/emails/notes/recordings etc. What mortality rate was used for the SMILE model run for the new aquaculture sites proposal in Mill Bay. 	Some elements of the document at <u>Annex E</u> have been redacted as the personal information of individuals other than yourself and therefore subject to Regulation 12(3) of the Environmental Information Regulations 2004 (EIR).
 4. How are seed inputs used in the SMILE model which was used for the new aquaculture sites proposal in Mill Bay? 5. What harvest weight is used for oysters in the SMILE model which was used for the new aquaculture sites proposal in Mill Bay. 	This effectively excepts third party personal information from disclosure if that disclosure would breach one of the data protection principles set out in Article 5 of the UK General Data Protection Regulation (GDPR).
6. Were any future proofing measures taken while running the SMILE model, used for the new aquaculture sites proposal in Mill Bay to ensure sustainability of existing businesses and wild bivalve populations in the coming years.	The first of these requires that personal information be processed lawfully, fairly and in a transparent manner. Lawfulness of processing (such as the disclosure of the personal information to you) requires that we can demonstrate that at least one of the lawful bases outlined in Article 6 of the
7. Can the SMILE model used for the new aquaculture sites proposal in Mill Bay allow for the condition of bivalves, and can assurances be given that existing businesses will not be negatively affected in their ability to produce "Special" grade oysters or that growth rates will not be slowed down.	GDPR applies. Only the Article $6(1)(f)$ basis ('legitimate interest') is likely to be applicable in this case.
8. Is there the same amount of available feed for bivalves both wild and cultured after the box containing the proposals has been manipulated in the SMILE model, used for the new aquaculture sites proposal in Mill Bay?	You are undoubtedly pursuing a legitimate interest in seeking to understand the environmental factors affecting the aquaculture sector in Carlingford Lough and how those have been evaluated by AFBI and others. However, the applicability of this lawful basis also requires that the disclosure is necessary



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 A copy of the full application to conduct experiments on mussels in Mill Bay. 	for those purposes. In this case, I do not believe that it is, and so I am withholding these elements of the requested information in line with
10.All paperwork/notes/data and any other information from the experiments on mussels in Mill Bay.	regulations 12(3) and 13(2A) of the EIR.
11.A copy of the Section 13 obtained for the experiments on mussels in Mill Bay.	
12.A copy of the assessment for Killowen Shellfish to access their site via the access lane other than Ballyedmund (as described in the AFBI report for consultation), DAERA claim to hold no such assessment.	
13.What is AFBI's understanding of the precautionary principle?	
Reference: AFBIEIR20230902	Date of Response: 11 September 2023
Date of Request: 11 September 2023	The following response was provided:
The following information was requested:	I am writing to advise that the Institute has completed its search and can confirm that we hold the information you seek. The paper this analysis is
The science impact 2022 report, page 27 draws a direct correlation between increased nutrients in Lough Neagh with higher numbers and growth of eels	based on is:
between 1950 and 1980, it also infers a correlation between reducing	Aprahamian, M. W, Evans, D. W., Briand, C., Walker, A. M., McElarney, Y., and
nutrients and a reduction in eel numbers and growth. Please provide the peer	Allen, M. 2021. The changing times of Europe's largest remaining
reviewed scientific papers on which this analysis is based.	commercially harvested population of eel Anguilla anguilla L. Journal of Fish biology 99: 1201-1221.
Reference: AFBIEIR20230903	Date of Response: 03 November 2023
Date of Request: 11 September 2023	The following response was provided:
The following information was requested:	I am writing to advise that the Institute has completed its search and can
	confirm that we do not hold a specific 'terms of reference' document. However, the project definition including its aims and objectives and



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Under FOI I request the terms of reference for "Scoping study for research on the effects of climate change on fish and fisheries of Lough Neagh" and details of the timescale to complete.

forecasts for delivery are contained in the full-format proposal form attached as <u>Annex A</u> to this letter. I believe that this will meet your needs.

It should be noted that since the project was approved in 2020, there have been several agreed changes to timescales and projected costings. The project's actual start date was 1 April 2022, and its projected end date is now mid-January 2024. The projected total project cost is now £190,629. The table below summarises the impact of these agreed changes on the timescales for the objectives and deliverables set out in the full-format proposal.

Objective	New end date	Deliverable	New end date
no.		no.	
11.1	February 2023	12.1	February 2023
11.2	November 2023	12.2	November 2023
11.3	January 2023	12.3	January 2023
11.4	September 2023	12.4	September 2023
11.5	May 2023	12.5	May 2023
11.6	January 2024	12.6	January 2024

It is possible that factors outside the control of the project team may require further applications to amend elements of the project plan.

Some elements of the full-format proposal document have been redacted as the personal information of individuals other than yourself and therefore subject to Regulation 12(3) of the Environmental Information Regulations 2004 (EIR).



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	This effectively excepts third party personal information from disclosure if that disclosure would breach one of the data protection principles set out in Article 5 of the UK General Data Protection Regulation (GDPR).
	The first of these requires that personal information be processed lawfully, fairly and in a transparent manner. Lawfulness of processing (such as the disclosure of the personal information to you) requires that we can demonstrate that at least one of the lawful bases outlined in Article 6 of the GDPR applies.
	Only the Article $6(1)(f)$ basis ('legitimate interest') is likely to be applicable in this case.
	You are undoubtedly pursuing a legitimate interest in seeking to understand the effects of climate change on fish and fisheries of Lough Neagh and how those have been evaluated by AFBI and others. However, the applicability of this lawful basis also requires that the disclosure is necessary for those purposes. In this case, I do not believe that it is, and so I am withholding these elements of the requested information in line with regulations 12(3) and 13(2A) of the EIR.
Reference: AFBIEIR20230904	Date of Response: 11 October 2023
Date of Request: 14 September 2023	The following response was provided:
The following information was requested:	I am writing to advise that the Institute has completed its search and can confirm that we hold information relating to your request, which is set out in
Under FOI please provide all data held relating to the spring concentration and mean annual chlorophyll-a concentration in Lough Neagh between 2001	the table attached as an <u>appendix</u> to this letter.
and 2023 also details of phosphorous concentration levels for the same period	The following data notes may be help clarify the information provided:



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	1) Units are microgrammes per litre (μg/l)
	 Means were derived for a Lough Neagh composite reading, which integrates surface and deeper waters to provide a representative measure of the entire water column.
	3) Mean values could not be calculated for:
	 spring mean if monitoring did not occur during March, April and May.
	 annual mean if monitoring did not occur for at least ten months of the calendar year.
	 2023 as year is incomplete and data to create means is not yet available.
	4) Note there was reduced monitoring in 2020 due to COVID.
	5) Insufficient monitoring took place for chlorophyll-a (CHLA):
	 in relation to spring means – in 2011, 2014, 2017 and 2019 only two of the spring months were monitored and in 2020 no monitoring took place from March to May.
	 in relation to annual means – in 2017 and 2018 only nine months were monitored and in 2020 five months were monitored.
	6) Insufficient monitoring took place for Total phosphorous (TP):



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	 in relation to spring means – in 2009 and 2020 there was no monitoring from March to May, and in 2011 only two of the spring months were monitored.
	in relation to annual means – in 2009 there was no monitoring for the entire calendar year, in 2018 only nine of the months were monitored and in 2020 only seven months were monitored.
Reference: AFBIEIR20231001	Date of Response: 31 November 2023
Date of Request: 5 October 2023	The following response was provided:
The following information was requested:	I refer to your request for information about the Carlingford aquaculture consultation and in particular harvest sizes in the SMILE model used. I am
The last reply stated that the lower harvest size used in the SMILE model for the current consultation process is 60 grams.	writing to advise you that following a search of our paper and electronic records, I have established that the information you requested is held by this Institute.
Can you please tell me what is the upper harvest weight used? Is a single weight entered into the model or a range? How is the range applied over the number of oysters used in the model?	Your queries, and AFBI's responses, are set out below: Can you please tell me what is the upper harvest weight used? There is no upper harvest weight in the model. The model simulates
	harvesting all oysters above the lower limit of the harvestable class. Is a single weight entered into the model or a range? EcoWin uses a weight classes approach to population dynamics – a number of
	weight classes with lower and upper limits, with variable range. How is the range applied over the number of oysters used in the model?
	The mid-point of each growth class (size range) is utilised, this depends on the size range, which varies at different stages of the growth cycle, dependent on scope for growth.



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Reference: AFBIEIR20231002	Date of Response: 30 November 2023
Date of Request: 17 October 2023	The following response was provided:
The following information was requested:	I am writing to advise that the Institute has completed a search of records covering the past two years and can confirm that we hold relevant
I appreciate the reply dated 3rd October. The letter was informative and reassured me that great care is taken in avoiding discharges into the lake.	information on two incidents.
Can I further ask if accidental discharges of slurry, or any other pollutants, have occurred in the past? And if so how often would these accidents occur in a given year, if any, and what quantities of discharge would have been involved?	On 26 September 2023 AFBI had a visit from the Northern Ireland Environment Agency (NIEA) regarding discolouring of water in a particular water course. The farm manager, along with an NIEA official, walked a short distance upstream and found a storm drain that appeared to have slightly discoloured water which was discharging into the water course. This 'clean' storm drain was followed back to where a 'dirty' storm drain appeared blocked and as a result, likely overflowed into the clean storm drain. This resulted in contamination of the clean storm drain and therefore the water course. The matter was quickly rectified. The inspector was content that actions taken reduced the discoloured discharge.
	On 01 October 2021 a valve left open by a contractor resulted in anaerobic digestate liquid waste (approximately 24,000 gallons) spilling on site. There was immediate action taken to block storm drains, simultaneously blocking rivers, to prevent any slurry entering the water. Appropriate action was taken, including notifying NIEA officials who attended the site and inspected
	the area and water courses. NIEA were content that all preventative action
	had been taken and no rivers were contaminated.
	We have no record of any other such incidents within this timeframe.
Reference: AFBIFOI20231201	Date of Response: 16 January 2024
Date of Request: 13 December 2023	The following response was provided:



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The following information was requested: Requester sought information relating to an investigation into working culture in AFBI animal services unit, including their own personal information.	I refer to your request for information about a recent investigation into working relationships in AFBI Animal Services Unit (ASU) received on 13 December 2023, in which you sought: • Interview statements from certain named staff members. • All recommendations and comments from the investigating officers. • Your original signed contract for VSD and also all relevant details regarding a proposed position in LPS, Hillsborough. • A copy of the specific policy that this investigation followed. I can confirm that AFBI holds some of the information you have requested, as outlined in the table in Annex A to this letter. This table also explains any exemptions that apply to the information requested and which in some cases prevent its disclosure. Other annexes to this letter contain information disclosed in response to your
	request – <u>annexes B, C and D.</u>
Reference: AFBIFOI20240201	Date of Response: 21 March 2024
Date of Request: 20 February 2024	The following response was provided:
The following information was requested:	I am writing to advise that the Institute has completed its search and can confirm that we hold the information, which is included (along with some explanatory background, in this letter and in the two annexed documents.
Using FOI regulations I request the following information please:	
1. Details - and findings - of all testing of farm animals, food products (including meat/dairy), animal feed, animal slurry/waste, and farm premises	The testing and requirements for anti-microbial resistance (AMR) in animals/food and feed have been varying over time, as this condition has become more relevant, particularly regarding the impact of antimicrobial resistant zoonotic bacteria to human health.



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for antibiotic resistant pathogens in NI, carried out or held by AFBI, for the time span November 2021 to the current date.

- 2. Please supply information, in as much detail as possible, of the testing carried out, e.g. Salmonella in retail poultry meat or pig/cattle carcasses / live animals; the pathogens found, e.g. E.coli, LA MRSA, Salmonella; and details of resistance found e.g. tetracyclines, macrolodes etc
- 3. Please supply-where possible-any data held in Excel or spreadsheet format.

AFBI performs different AMR testing schemes and related activities as detailed below.

European AMR Monitoring 2014 - Present

From 2014-onwards, new statutory tests were required by the EU AMR monitoring specified in EU Decision EU/2013/652 (2014-2020)¹ and EU Decision EU/2020/1579 (2021-2028)². AFBI carried out laboratory testing of abattoir samples as specified by these pieces of legislation. Samples tested include pig and poultry caeca processed in alternate years. The AST is performed on the mandatory bacteria only (not on the voluntary recommended bacteria species), those include commensal E. coli, Extended Beta-lactamase Resistant E. coli (ESBL), Campylobacter jejuni, Campylobacter coli (since 2021) and Salmonella spp. The laboratory methodology for isolation, confirmation and determining the Minimum Inhibitory Concentration (MIC) by specific antimicrobials is based on standard protocols developed by the European Reference Laboratory for Antimicrobial resistance (EURL-AR)³. Data from this monitoring is published in the EU Summary report of antimicrobial resistance of commensal and zoonotic agents as above.

In addition, the data from Northern Ireland have contributed to the UK data for this monitoring scheme. UK data are published every year as part of the EU Summary Reports on antimicrobial resistance of commensal and zoonotic



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	agents by the European Food Safety Authority (EFSA) and the European Centre for Disease Control and Prevention (ECDC). The published reports by years since November 2021 can be found at the European Union summary report on antimicrobial resistance in zoonotic and indicator bacteria from humans, animals and food in 2021–2022 EFSA (Europa.eu)
	The report relating to 2022-2023 has not yet been published.
	AST on bacterial isolates of relevance for animal health from diagnostic samples
	Moreover, AFBI's mandate covers the provision of diagnostic investigation of disease incidents in livestock. Thus, as part of this mandate, when bacteria are isolated, antimicrobial susceptibility testing (AST) is performed to provide the private veterinary practitioners with information that helps them apply an appropriate treatment on the animals of affected farms. Diagnostic data from AFBI has been periodically published in the UK-VARSS report (since 2015). Laboratory methodology is based on disc-diffuse tests, list of antimicrobials and breaks points are described in Annex 2. The link to the UK-VARSS by publishing year are:
	Veterinary Antimicrobial Resistance and Sales Surveillance 2021 - GOV.UK (www.gov.uk) Veterinary Antimicrobial Resistance and Sales Surveillance 2022 - GOV.UK (www.gov.uk)
	Livestock-Associated Methicillin resistant <i>Staphylococcus aureus</i> (LA-MRSA) was first isolated from livestock (pigs) in Northern Ireland in 2013 (Hartley et al) ⁴ . Thus, when <i>Staphylococcus</i> isolates from animals submitted for



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	diagnostic investigation are resistant to third generation of cephalosporthey are tested for the presence or absence of the methicillin resistant cassette by a validated PCR method available in the EURL-AR5. Since 20 the isolates by year and animal species detected in Northern Ireland are follows:)13,
	Year Clonal Livestock Number Commen	ts
	2021 suspect Porcine 3 spa type consister with CC3	nt
	2022 suspect Porcine 1 spa type consister with CC3	nt
	2023 Suspect Porcine 2 spa type consister with CC3	nt
	 ¹ 2013/652/EU: Commission Implementing Decision of 12 November 2013 on the monion and reporting of antimicrobial resistance in zoonotic and commensal bacteria ² Commission Implementing Decision (EU) 2020/1729 of 17 November 2020 on the monion and reporting of antimicrobial resistance in zoonotic and commensal bacteria and reperting Decision 2013/652/EU ³ EURL-AR- AMR Laboratory testing protocols ⁴ Confirmation of LA-MRSA in pigs in the UK - Hartley - 2014 - Veterinary Record - Wiley 	nitori ealing
eference: AFBIFOI20240202	Date of Response: 21 March 2024	



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Date of Request: 20 February 2024	The following response was provided:
The following information was requested:	Thank you for your request for information about pathogen testing carried out by AFBI (salmonella and antibiotic resistance). I am writing to advise that
I request the following please:	the Institute has completed its search and can confirm that we hold the information.
1, For the period Nov 2021 to the present day, the number of isolates for	
salmonella infantis identified during any tests carried out on farm animals,	You requested:
farm locations, livestock feed, meat or other food products in Northern	Tou requesteu.
Ireland, including poultry products, live chickens etc	 For the period Nov 2021 to the present day, the number of isolates for salmonella infantis identified during any tests carried out on farm
2, Details of antibiotic resistance detected in the above isolates, including the specific drugs any resistance related to	animals, farm locations, livestock feed, meat or other food products in Northern Ireland, including poultry products, live chickens etc.
3, Please supply as much information as possible - and able to be released - about the positive samples, e.g. broiler chickens on-farm, supermarket	This information is contained in the table attached as $\underline{\text{Annex 1}}$ to this letter.
chicken products, ready-to-eat food items, feed, whether imported etc	Details of antibiotic resistance detected in the above isolates, including the specific drugs any resistance related to.
	This information is contained in the table attached as <u>Annex 2</u> to this letter.
	Commercial information has been removed from both tables as exempt
	information under Section 43(2) of the Freedom of Information Act 2000, in
	that its disclosure would be likely to prejudice the commercial interests of the
	Agri-food and Biosciences Institute and other persons. And while there is a
	public interest in transparency, this is outweighed in this case by the public
	interest in AFBI being a trusted provider of confidential testing services, and
	in food processors and others not being dissuaded from providing samples
	for testing.
Reference: AFBIEIR20240301	Date of Response: 28 March 2024



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Date of Request: 29 February 2024	The following response was provided:
The following information was requested: Is the quoted figure of 62 % of pollution into Lough Neagh from agriculture accurate or estimated?	Thank you for your letter of 29 February 2024 where you requested information about pollution in Lough Neagh. I am writing to advise that the Institute has completed its search and can confirm that we hold the information.
 How is this analysis carried out? Has there been any increase in the pollution from agriculture in the 	In the paragraphs below, your original queries are in bold face.
last 10 years?	Is the quoted figure of 62 % of pollution into Lough Neagh from agriculture
	accurate or estimated?
	This figure is an estimated average for Northern Ireland taken from the RePhoKUs report. It is not a figure specific for Lough Neagh and the figure for the Neagh-Bann catchments could potentially be different – work is underway to refine this estimate in a more catchment specific study.
	The figure is "estimated" as opposed to observed, but this is not contrary to the "accuracy". The most accurate way to assess the phosphorus pollution in the catchment that goes into the lough will always be an estimate created by a modelled assessment driven by observational data; it is not possible to observe and measure every single input/output of phosphorus at landscape scales. In this specific case, accuracy for Lough Neagh inputs would be improved by a focus specifically on the inflowing catchment areas for the Lough (potentially with some additional monitoring), and enhanced catchment specific modelling.
	How is this analysis carried out?
	The figures are from the Phosphorus (P) Substance Flow Analysis (SFA), carried out as part of the Rephokus project. An SFA is an analytical tool used



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	to quantify the stocks and flows of any material within a defined system. For the purposes of this study the system is the food system within the geographical border of Northern Ireland (NI) for the year 2017. The focus of the SFA was on P due the significant challenges that NI faces in its sustainable management in the context of achieving agronomic and environmental targets.
	A full report with the analysis and method is available at RePhoKUs report October 2020x.pdf (afbini.gov.uk)
	Has there been any increase in the pollution from agriculture in the last 10 years?
	Comment on change over the last 10 years is not straightforward as there are many potential sources of agricultural pollution, varying by land use and management, not all of which is monitored, and information is held by different agencies.
	For information on agricultural point source pollution the best point of contact would be NIEA who would hold records on the number of incidents reported in any year. Those might give some indications as to whether there are increased/decreased incidents of pollution (and not just nutrients but other chemical/biological contaminants, such as pesticides), but this will need to be considered against the level of incident reporting and surveillance (potentially reduced, for example, in the initial period of the pandemic). This is not something AFBI could comment on.
	For diffuse losses of nutrients, and particularly phosphorus in the case of current freshwater quality issues, it is a complex picture as climatic variability year-on-year makes patterns difficult to see, particularly when it comes to the load of a nutrient passing through the system.



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	There is however a general relationship between inputs of phosphorus to the agricultural system (the residuals of which ultimately end up in soil from which they may be lost to water) and the phosphorus concentrations measured in rivers. Figure 1 in the RePhokus report (referenced in previous answer) illustrates this linkage with the similarity in trajectories between river soluble reactive phosphorus (SRP) concentrations (NI average) and the P surplus (farm gate P balance for NI) between 2004 and 2018.
	Both the farm gate P balance and riverine SRP concentrations have generally continued to increase in the years since 2018 (this information is available from DAERA/NIEA) so the source pressure has not reduced.
	Framing this increase into an overall view on whether agricultural pollution has increased, and where (as there may be considerable variation among catchments), without including information on point sources and other contaminants however would not be recommended.