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Huw Woodward, Elizabeth Ramos Fonseca, Tim Oxley, Ed C. Rowe, Massimo Vieno, Eiko Nemitz, Helen ApSimon



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1 **Accounting for the uncertainty in nitrogen deposition estimates in support of policy**

2 Huw Woodward^{1*}, Elizabeth Ramos Fonseca¹, Tim Oxley¹, Ed C Rowe², Massimo Vieno³, Eiko Nemitz³,
3 Helen ApSimon¹

4 ¹Centre for Environmental Policy, Imperial College London, London, UK

5 ²UK Centre for Ecology & Hydrology, Environment Centre Wales, Bangor, UK

6 ³UK Centre for Ecology and Hydrology, Bush Estate, Penicuik, United Kingdom

7 *huw.woodward@imperial.ac.uk

8 **Abstract**

9 Deposition of reactive nitrogen (N_r) onto sensitive habitats in exceedance of Critical Load (CL)
10 thresholds can drive biodiversity loss and affect ecosystem function. N_r deposition is a highly complex
11 process that is difficult to measure and model, leading to large uncertainties.

12 We assess the implications for policy development and target setting of the large range in estimates
13 provided by different modelling approaches.

14 We considered three UK models (UKIAM, EMEP4UK, CBED), used to inform national policy and
15 responses to the UN-ECE Air Convention. We used a scaling method to project the range in current
16 estimates to future scenarios, and a risk-based approach to provide a probabilistic assessment of
17 exceedances. We considered two future scenarios, a 2040 baseline and a 2040 high ambition
18 technological measures scenario, in relation to a 2018 baseline.

19 The 2018 baseline CL exceedances are highly dependent on the model used – Average Accumulated
20 Exceedance of 1.3-9.1 kg.N.ha⁻¹.yr⁻¹ across all habitats. The relative reduction in exceedances for future
21 scenarios also depends on the model, with a range of 30-66% achieved by 2040 for the high ambition
22 scenario, posing a challenge for target setting. Despite this, it's clear that a much greater level of
23 ambition is required to protect the majority of habitat areas. Our risk-based approach shows that
24 implementing only technological measures is likely to leave most areas in exceedance in 2040.

25 This uncertainty in the assessment of N_r deposition and the benefits of abatement measures poses a
26 challenge for policy development that is not unique to the UK.

27 **Keywords:** nitrogen, deposition, air pollution, critical load, habitat, biodiversity, policy

28 **1. Introduction**

29 The deposition of reactive nitrogen (N_r) in its various forms (e.g. NO_3^- , NH_4^+ , NH_3 , HNO_3 , NO_x) on
30 nitrogen-sensitive habitats is a major driver of global biodiversity loss (e.g. Stevens et al. 2011, Bobbink
31 et al. 2010, van der Plas et al. 2024). High rates of N_r deposition lead to the eutrophication of soils and
32 freshwaters, resulting in the loss of species that are outcompeted when N_r availability is increased.
33 High N_r deposition rates also potentially lead to acidification, causing nutrient deficiencies and reduced
34 plant productivity, and the loss of acid-sensitive species. These impacts on sensitive habitats can
35 induce changes in the flora (e.g. Dise et al., 2011; Stevens et al., 2016) and fauna (Nijssen et al. 2017)
36 associated with these habitats and habitat function, which in turn can affect ecosystem services
37 provided by the habitat. Atmospheric N_r deposition can have positive and negative impacts on the
38 ability of an ecosystem to sequester carbon from the atmosphere (e.g. Bragazza et al., 2006; de Vries
39 et al., 2009, Laudon et al. 2024) which may have implications for Net Zero targets.

40 Critical Loads (CLs) are estimates of the annual deposition rate below which a habitat is not considered
41 to be significantly harmed (Nilsson and Grennfelt, 1988). Vast areas of nitrogen sensitive habitat are
42 estimated to be in exceedance of their CLs in many developed countries such as the United States
43 (Clark et al., 2018) and most European Union countries (European Commission, 2022a). In the UK, the

44 vast majority of all nitrogen sensitive habitat areas are estimated to be in exceedance of their CLs
45 (Rowe et al., 2024).

46 The biggest source of deposited atmospheric N_r in the UK is NH_3 from agriculture (Woodward et al.,
47 2022), followed by NO_x emissions from road transport, the power sector and shipping. Emissions of
48 NO_x are projected to decrease considerably with electrification of road transport and power sectors
49 (e.g. Mehlige et al., 2021). Future emissions from shipping are more uncertain. Ammonia has been
50 proposed as a low-carbon replacement for fossil fuels (e.g. UK Net Zero Strategy BEIS (2021)), which is
51 likely to result in sustained NO_x emissions, combined with additional fugitive NH_3 emissions.
52 Agricultural NH_3 has proven to be particularly difficult to abate, with the majority of agricultural NH_3
53 emissions associated with livestock production (Defra 2024). Despite some efforts to reduce these
54 emissions through technological solutions (e.g. low emission spreading of fertiliser and improved
55 manure management; Defra 2018), total NH_3 emissions have remained fairly steady in the UK since
56 2010 (Defra 2024). Since 2010, some success in abatement, coupled with a gradual reduction in cattle
57 numbers, has been countered by increasing emissions in certain sectors such as non-manure digestate
58 (increasing from 1.6kt NH_3 in 2005 to 13.1kt NH_3 in 2021 (Carswell et al. 2024)). Other countries have
59 demonstrated that significant reductions in total agriculture NH_3 are possible using technological
60 measures, for example the Netherlands saw a reduction in total NH_3 of 64% between 1990 and 2014
61 (Wichink Kruit et al. 2017). Unless total NH_3 emissions in the UK are reduced substantially, CL
62 exceedances are likely to remain high (Woodward et al. 2022).

63 Large uncertainties are associated with both measured and modelled values (Dore et al., 2015; Cowan
64 et al., 2022; Williams et al. 2017, Walker et al. 2019)). We discuss the underlying reasons for these
65 uncertainties in the Section 4. The uncertainty in deposition estimates is reflected in the range given
66 by different models that have been applied to the UK (RoTAP 2012, Dore et al. 2015, Woodward et al.
67 2022). Here we used three models to illustrate the significance of this range in estimates on the
68 assessment of CL exceedances in the UK. There is also uncertainty in the CL values assigned to N-
69 sensitive habitats (e.g. Bobbink and Hettelingh, 2011; Bobbink et al. 2022). For N_r deposition, a range
70 in CL is determined for each habitat following review of empirical evidence by an expert group, with
71 the exception of managed coniferous woodland for which CL is set using a mass balance approach. The
72 range assigned to each habitat represent both the uncertainty in the derivation of the CL and the
73 ecosystem response, but also the variation in sensitivity within a habitat. When evaluating CL
74 exceedances at national level without a local assessment of a habitat area, the variation within a given
75 habitat contributes to the uncertainty in the assessment. While these CLs have proven useful as a
76 measure of the varying degrees of resilience of different habitats to excess N_r , and to inform
77 international negotiations under the Convention on Long-Range Transboundary Air Pollution (CLRTAP),
78 they are an additional source of uncertainty in the assessment of N_r deposition impacts (Jones et al.,
79 2016).

80 These uncertainties pose a challenge to the use of modelled N_r deposition and CL exceedances in
81 support of policy. Here we used the risk-based approach described in Woodward et al. (2022) to
82 illustrate the significance of uncertainty in N_r deposition estimates when assessing impacts on sensitive
83 habitats at a national scale. Policymakers often require projections of the degree of improvement
84 achieved by a future date as a result of proposed interventions, to inform their decisions. We therefore
85 assessed the difference between models in the predicted decrease in deposition and exceedances
86 relative to the 2018 baseline year.

87 We considered the implications of the range in forecast deposition for policy development aimed at
88 reducing the harmful impacts of N_r deposition, such as the target to reduce N_r deposition onto sensitive
89 habitats in England by 17%, set in the UK Clean Air Strategy (Defra 2019), i.e. all areas of priority habitat
90 including those not within protected sites (Rowe et al. 2024). Implications for broader habitat
91 restoration targets were also considered both in the UK, in the European Union and consideration for
92 the Gothenburg Protocol revision.

93 2. Method

94 Three models are used for our analysis, each of which are each used in support of UK policy
95 development. The Concentration Based Estimated Deposition (CBED) is a semi-empirical inferential
96 model used for CL exceedance reporting in the UK (Rowe et al., 2024) and for UK reporting under
97 CLTRAP. The UK Integrated Assessment Model (UKIAM) is used in support of UK air policy development
98 and was a key tool providing evidence in support of the targets set in England's Environment Act 2021
99 (ApSimon et al., 2022). The EMEP4UK model is also a key model used in support of these targets and
100 is a UK high resolution implementation of the European EMEP MSC-W model (Simpson et al., 2012).
101 The European EMEP model is used extensively in support of policy development under the CLRTAP.

102 The CBED model is calibrated using measurement data and therefore a meaningful validation
103 challenging. The validation of CBED in the literature is limited to the validation of the models used to
104 interpolate between measurement points, such as the seeder-feeder model. Even in this case,
105 validation is limited (e.g. Beswick et al. 2003, Dore et al. 2006).

106 Dore et al. (2015) performed a model intercomparison a "fitness for purpose" analysis which includes
107 EMEP4UK and FRAME. FRAME is a Lagrangian ACTM which underpins UKIAM. Both models are
108 deemed fit for purpose based on the criteria used by Dore et al. (2015). Despite this, the paper also
109 highlights clear differences between these two models, with EMEP4UK typically giving lower estimates
110 of concentrations and concentrations in precipitation than FRAME. A statistical comparison of UKIAM
111 and CBED is given in Woodward et al. (2022). The EMEP MSC-W model is routinely and extensively
112 compared with observations across Europe, including the UK (MSC-W & CCC, 2020), and Ge et al.
113 (2021) undertook a global study demonstrating acceptable performance.

114 2.1. The UK Integrated Assessment Model

115 The UKIAM models atmospheric concentrations and human population exposure to harmful air
116 pollutants (ApSimon et al., 2021, 2023; Oxley et al., 2023), and also evaluates the impact of air
117 pollutants on sensitive habitats (Woodward et al. 2022). The model combines UK emissions of NH₃,
118 SO₂, NO_x and PM_{2.5} with transboundary contributions from other countries and international shipping,
119 allowing the sources of deposition to be apportioned across different sectors. UKIAM estimates
120 deposition for future scenarios by scaling Source-Receptor (S-R) footprints of deposition, generated by
121 an ACTM, to reflect the change in emissions relative to a base case. The Fine Resolution Atmospheric
122 Multi-pollutant Exchange (FRAME) model (Dore et al. 2007, Vieno et al. 2010, Hallsworth et al. 2007,
123 Aleksankina et al. 2018) was used to generate these S-R footprints using average meteorology over a
124 number of years. FRAME includes a simple enhancement term for areas of higher altitude and
125 precipitation which attempts to capture the additional deposition due to the seeder-feeder effect
126 (Dore et al., 1992; Smith & Fowler, 2000) (see Discussion for explanation of seeder-feeder effect).

127 The scaling of S-R footprints means that a linear relationship is assumed between the change in
128 deposition due to a change in emissions from a source. This linear assumption has been shown to be
129 acceptable for variations in emissions of $\pm 40\%$ (Aleksankina et al., 2018), i.e. within this range the
130 effect of non-linearity is acceptable relative to other uncertainties.

131 Different deposition velocities are assumed for short semi-natural habitats, such as grasses and dwarf
132 shrub heath, than for taller habitats, such as woodlands. Fertilised habitats are not considered in this
133 study. Separate maps are generated for deposition onto short habitats, referred to as "moorland", and
134 onto woodland. A detailed description of the UKIAM is provided by ApSimon et al. (2021) and Oxley et
135 al. (2023).

136 2.2. CBED

137 CBED is based on measurements collected at sites in the UK Eutrophying and Acidifying Pollutants
138 (UKEAP) network (Conolly et al., 2023). To smooth the concentration fields of secondary pollutants

139 (e.g. NO_3^- and NH_4^+ aerosols and HNO_3 gas) CBED uses interpolated maps of the measured values. For
 140 the primary pollutants NH_3 and NO_2 , concentrations are predicted with EMEP4UK and the Pollution
 141 Climate Mapping model (Defra n.d.), respectively, and scaled with the measurement data, before being
 142 combined with data on landcover and meteorology to generate a 5 x 5 km² map of deposition values
 143 across the UK. The CBED model estimates dry deposition using a “big leaf” approach (Smith et al.,
 144 2000), combining gas and particulate concentration maps, constrained to measurements, with maps
 145 of vegetation cover and average meteorology. The model accounts for vegetation-specific deposition
 146 velocities and includes a simple model of bidirectional exchange of ammonia that allows for stomatal
 147 emission.

148 Wet deposition is estimated by combining spatially distributed measurements of concentrations in
 149 precipitation with annual precipitation maps from the UK Meteorological Office. An enhancement
 150 term is included to account for the seeder-feeder effect (Dore et al. 1992; Smith & Fowler, 2000). A
 151 parameterisation of occult deposition is also included. CBED was designed to be independent of the
 152 uncertainty in emission inventories, and is driven by measured concentrations, so is not mass-
 153 conserved. In CBED a doubling in the deposition velocity results in a doubling in deposition. By
 154 contrast, in an ACTM, increased deposition depletes the air resulting in less deposition later on or
 155 downwind.

156 CBED predicts the average deposition over three years, rather than a single year.

157 As with UKIAM, CBED applies “moorland” deposition rates to short unfertilised vegetation and
 158 “woodland” deposition rates for taller, woodland habitats.

159 2.3. EMEP4UK

160 EMEP4UK is a full Eulerian atmospheric chemistry transport model (ACTM). EMEP4UK simulates
 161 emissions, transport, chemical transformations and deposition of a wide range of pollutants with
 162 hourly outputs (e.g. Vieno et al., 2014). The model resolves deposition rates for the UK at
 163 approximately 3 x 3 km² resolution nested within a European domain with a resolution of 27 x 27 km².
 164 The Weather Research and Forecasting (WRF) model (Skamarock et. al. 2019) provides the
 165 meteorological input data. EMEP4UK uses a tiled deposition approach and for each grid cell calculates
 166 separately the deposition received by each of coniferous woodland, deciduous woodland, crops, short
 167 seminatural vegetation and water land-cover types (Simpson et al., 2012).

168 2.4. Habitats and critical loads

169 The nitrogen-sensitive habitats that were considered for analysis are shown in Table 1, along with the
 170 range of CL values assumed. CL values were based on the ranges proposed in the latest CLRTAP review
 171 (Bobbink et al., 2022). Exceedances were calculated using the lower end of the proposed CL range for
 172 each habitat, which is the value used for UK exceedance reporting (Rowe et al., 2024). These habitat
 173 areas and CLs were mapped at 1 x 1 km² resolution across the UK, with a proportion of each grid square
 174 assigned to each habitat. Exceedance of CL were calculated for each grid square where a habitat is
 175 present, using deposition calculated by each of the three atmospheric models. The habitat type
 176 specified in Table 1 determined whether the moorland (short) or woodland (tall) deposition map were
 177 used.

178 As a metric of exceedance across a region the Average Accumulated Exceedance (AAE) is often used:

$$179 \quad AAE = \frac{1}{A_T} \sum_{h=1}^H \sum_{i=1}^N E_i \times A_i$$

180 Where E_i and A_i are the exceedance and area of a habitat in grid square i , respectively. H and N are
 181 the total number of habitats (13) and grid squares, respectively, and A_T is the total area of all habitats

182 $A_T = \sum_{h=1}^H A_i$. The exceedance was calculated as $E_i = \max(0, D_i - CL_{rec_i})$ where D_i is the land cover
 183 specific deposition of N_r for grid square i , and CL_{rec_i} is the recommended CL.

184 The recommended CL lies within the range agreed upon in international workshops under CLRTAP and
 185 is chosen by UK experts to reflect UK-specific factors such as soil pH and annual precipitation. Since
 186 the latest review, CL_{rec} has been set to equal the minimum value for the CL range, CL_{min} .

187 Another often reported metric is the percentage of habitat area in exceedance.

188 Table 1: Nitrogen deposition habitat areas and critical loads.

Habitat	Area in the UK (km ²)	EUNIS habitat class	Habitat type for deposition	CL _{min} -CL _{max} range (kg N ha ⁻¹ yr ⁻¹)	CL _{rec} (kg N ha ⁻¹ yr ⁻¹)
Acid grassland dry & wet	20365	R372 & R1M (E1.7 & E3.52)	Short	6-10 & 10-20	6 & 10
Calcareous grassland	1012	(R1A)E 1.26	Short	10-20	10
Dwarf shrub heath (wet & dry)	21846	S411 & S42 (F4.11 & F4.2)	Short	5-15	5
Montane	4915	E4.2 ¹	Short	5-10	5
Bog	9118	Q1 (D1)	Short	5-10	5
Managed coniferous woodland	14450	T31 (G3)	Tall	10-15	10
Broadleaved woodland	8706	T1 (G1)	Tall	10-15	10
Beech woodland (unmanaged)	2059	T17 (G1.6)	Tall	10-15	10
Acidophilous oak woodland (unmanaged)	6958	T1B (G1.8)	Tall	10-15	10
Scots Pine woodland (unmanaged)	1485	T35 (G3.4)	Tall	5-15	5
Mixed woodland	1422	G4	Tall	10-15	10
Dune grassland	631	N15 (B1.4)	Short	5-15	5
Saltmarsh	808	MA223 /MA224/MA225 (A2.53/54/55)	Short	10-20 & 20-30	10 & 20

¹The 2023 revision of EUNIS codes does not include a class for montane habitats (formerly moss summits) hence the critical load for E4.2 has been retained.

189

190 **2.5. Exceedance score**

191 In recognition of the high uncertainty in deposition estimates and the uncertainty and variability in
 192 CLs, we developed a probabilistic approach for the evaluation of N_r deposition exceedances
 193 (Woodward et al., 2022). The method, which is based on the UK Nitrogen Decision Framework (NDF)
 194 (Jones et al., 2016), uses lower and upper estimates of deposition and the CL_{min} and CL_{max} values
 195 from Bobbink et al. (2022) for the CL range.

196 To obtain these lower and upper estimates across the UK we follow the scaling method described in
 197 Woodward et al. (2022). We first calculate a map of the ratio of CBED and EMEP4UK deposition values
 198 for the base year 2018. We use EMEP4UK here instead of UKIAM, which is used in Woodward et al.
 199 (2022), because EMEP4UK typically gives lower estimates (see Section 3.1) and therefore will provide
 200 a better estimate of the lower bound. We then use this map to scale our EMEP4UK deposition
 201 estimates for all future scenarios to produce a second set of deposition estimates, E4UK-Scaled, as
 202 follows:

$$203 \quad N_{E4UK-Scaled}^i = N_{E4UK}^i \times \left(\frac{N_{CBED}^{2018}}{N_{E4UK}^{2018}} \right)^i \quad \text{for each grid square } i.$$

204 We then take the lower and upper deposition estimate in each grid square to derive our lower and
 205 upper maps of deposition as follows

$$206 \quad N_{min}^i = \min(N_{E4UK}^i, N_{E4UK-Scaled}^i),$$

$$207 \quad N_{max}^i = \max(N_{E4UK}^i, N_{E4UK-Scaled}^i).$$

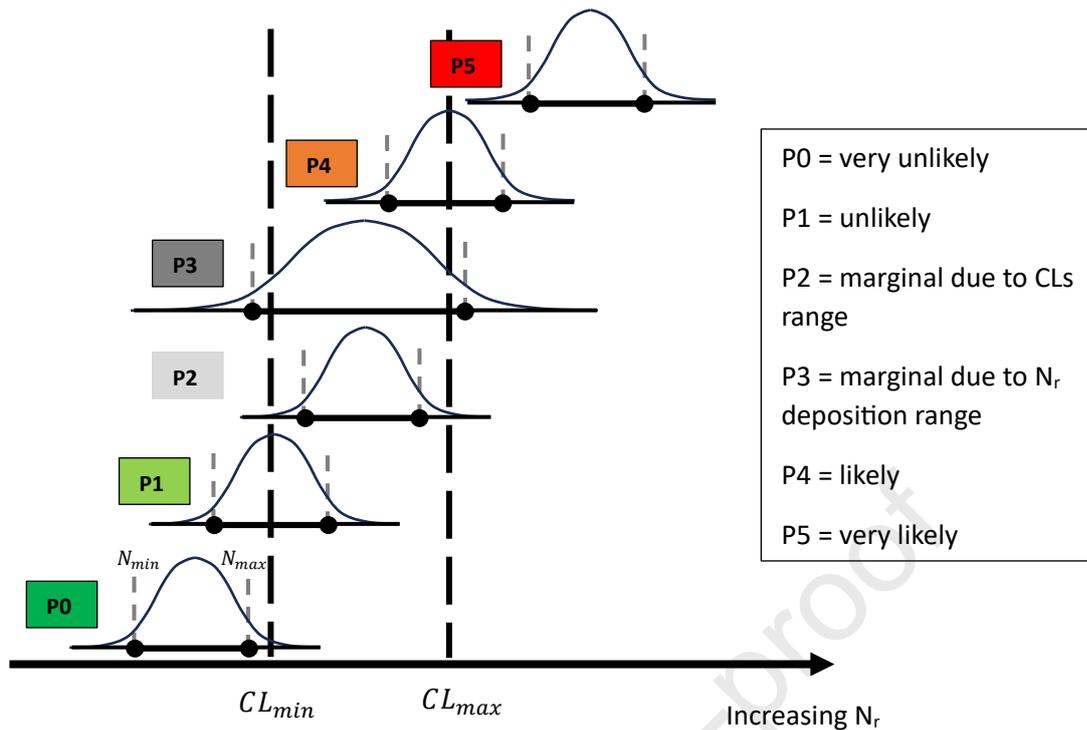
208 CBED suggests higher deposition than EMEP4UK across the vast majority of grid squares in 2018 and
 209 so the map of upper estimates, N_{max} , closely resembles the E4UK-Scaled map, while N_{min} resembles
 210 EMEP4UK.

211 This scaling method is not mass-conservative as it artificially enhances deposition rates. In reality,
 212 higher deposition rates would mean lower pollutant concentrations in the air, or higher emissions than
 213 that assumed in the simulation. The method is not intended to replicate the complex physics of
 214 atmospheric deposition, rather it is intended as a policy tool which communicates the degree of
 215 uncertainty in deposition estimates to policymakers.

216 In reality there is also an uncertainty range associated with the estimates of each model and actual
 217 deposition may lie outside this range. However, they are intended to represent a proportion of range
 218 of possible deposition values and cover the range of predictions used to inform policy.

219 We combine this range with the range in CL estimates that are allocated to each N-sensitive habitat
 220 (Table 1). This range reflects the variation in the level at which damaging impacts can occur from one
 221 site to another (for example, because of differences in rainfall, soil pH, management, nutrient
 222 limitation) and uncertainty in the empirical data on which the critical load is set. While the NDF adjusts
 223 the range in CL values defined by the European Nature Information System (EUNIS) to reflect the
 224 confidence in their suitability for UK specific habitat areas, here we use the unadjusted ranges given in
 225 Table 1.

226 Figure 1 is an illustration of how the exceedance score is derived. In the case that the full range of
 227 deposition estimates is less than the minimum critical load, then exceedance is considered to be very
 228 unlikely (P0). The probability then increases until we reach the very likely case (P5) where the entire
 229 deposition range exceeds the maximum CL.



230

231 Figure 1: Illustration of exceedance scores. The distributions represent the true uncertainty
 232 distribution. We assume that our values for N_{min} and N_{max} derived from the range in model estimates
 233 represent points near either end of the distribution. CL_{rec} is shaded because this is not used for the
 234 derivation of the score. We show it here in aid of the discussion.

235

236 2.6 Emissions scenarios

237 We consider three scenarios for the analyses reported here, which are consistent with the scenarios
 238 considered for a model intercomparison focussed on $PM_{2.5}$ air quality (Oxley et al., 2023):

239 **B2018** – The baseline in 2018. The UK baseline emissions are taken from the UK’s National Atmospheric
 240 Emission Inventory (NAEI) (Churchill et al., 2022; Carswell et al., 2024). Emissions of other countries
 241 reflect scenarios developed by the International Institute for Applied Systems Analysis for the EU’s 2nd
 242 Clean Air Outlook, with additional measures. The EMEP4UK shipping emissions are derived from the
 243 EMEP CEIP emissions inventoried and may be different to the shipping emission uses in the UKIAM,
 244 where the emissions from shipping are modelled based on Ricardo Automatic Identification System
 245 tracking data for the domestic and international fleets around the UK. 2018 is chosen as a year as this
 246 is the base year for many air pollution targets set by the UK government in the Environment Act 2021.

247 **B2040** – baseline 2040 emissions assuming existing interventions and policies with a natural
 248 technology turnover. This does not include the electrification of road transport and the power sector.
 249 The contribution from other countries is assumed to have reduced by 13%, and by 18% for
 250 international shipping.

251 **H2040** – This represents a high ambition scenario with technological measures applied to the baseline
 252 to abate air pollutants. This includes the electrification of road transport and the power sector, leading
 253 to substantial reductions in NO_x emissions. It also includes very high ambition technological measures
 254 applied to agricultural NH_3 , with a total abatement of 44 ktonnes NH_3 from this sector. These measures
 255 include low emission spreading, rapid incorporation, slurry tank covers and the use of urease
 256 inhibitors. Given the challenge in reducing NH_3 from agriculture this is likely to be close to the

257 maximum feasible reduction from technical measures. Despite this large NH₃ abatement for
 258 agriculture, the total NH₃ reduction is lower due to increases for other sectors. These are mostly small
 259 other than a large increase in emissions (15 kt) from anaerobic digestion (AD) and digestate spreading.
 260 AD is expected to grow substantially in the UK and forms part of the UK's Net Zero (BEIS 2021) and
 261 Biomass strategies (DESNZ 2023). NH₃ emissions from this process and the spreading of digestate is an
 262 area of growing concern. The same assumptions as B2040 are taken for other countries and
 263 international shipping.

264 The total UK emissions for each scenario are provided in Table 2.

265 Table 2: Total UK air pollutant emissions (in kt yr⁻¹) for each scenario.

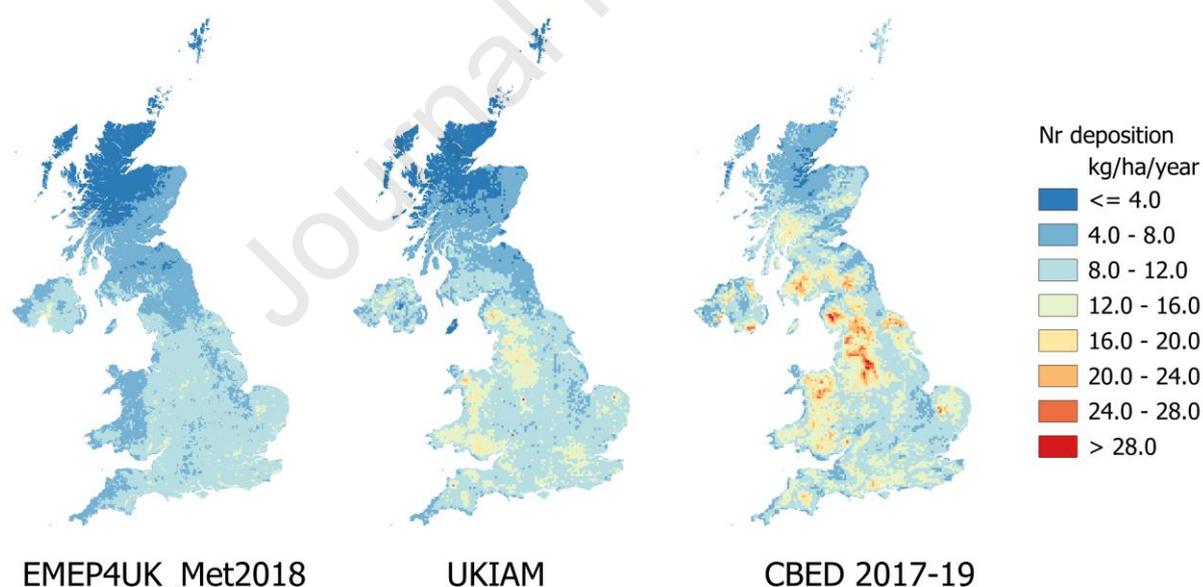
Scenario	NH ₃	NO _x
B2018	274	788
B2040	274	461
H2040	245	385

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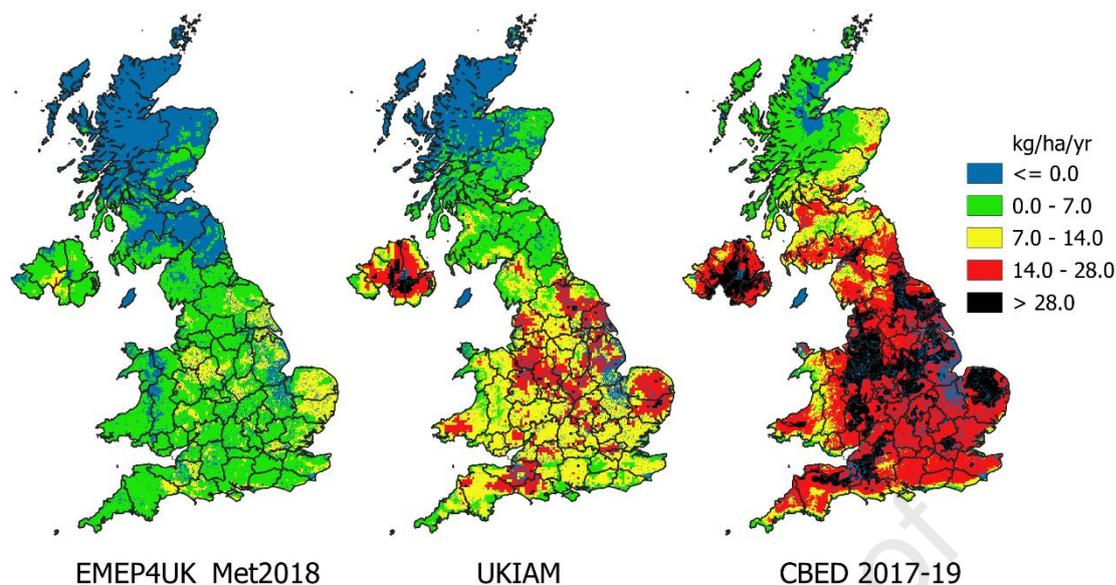
267 3. Results

268 3.1 Comparison of models

269 Figure 2 shows the N_r deposition estimates for all three models in 2018 (CBED estimates the average
 270 over 3 years, in this case 2017-2019) and Figure 3 shows the resulting AAE maps. There are clear
 271 differences between each model, with EMEP4UK providing the lowest estimates and CBED the highest.
 272 The total UK deposition budgets are shown in Figure S1 and split between wet and dry deposition of
 273 NH_x and NO_x for EMEP4UK and UKIAM, and total NH_x and NO_x for CBED.



275 Figure 2: Total reactive N deposition across the UK in 2018 by different models.



276

EMEP4UK_Met2018

UKIAM

CBED 2017-19

277

Figure 3: Average accumulated exceedance for all habitats for B2018 for each model.

278

While the models provide a range of deposition estimates across the country, the greatest differences occur in areas of higher altitude and precipitation (e.g. much of Wales, the Peak District, Pennines and Lake District in England).

279

281

Deposition is complex in these areas and can occur through different complex processes as discussed in Section 1.1. The use of bulk rather than wet-only deposition measurements in the mapping of wet deposition is one reason for the higher deposition estimates given by CBED. Bulk deposition measurements are known to overestimate wet deposition due to contamination by dry deposition sources (Cape et al., 2009). Wet-only deposition sensors are designed to solve this issue however have not been as widely used. Another factor is that CBED includes occult deposition not currently accounted for in ACTMs like EMEP4UK or FRAME (which underpins UKIAM). Additional uncertainties in CBED arise from the combination of annual average concentrations with annual average meteorology (e.g. Schrader et al., 2018).

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The seeder-feeder enhancement, which is in a simplified form accounted for in the FRAME source-receptor relationships, is the main reason why UKIAM estimates are higher than EMEP4UK in these areas. However, the magnitude of the enhancement is both highly uncertain (Cowan et al. 2022) and in reality the concentration enhancement in the rained out orographic cloud is likely to vary significantly in time and space depending on local topography and rainfall, and upwind emissions.

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While there is better agreement between the models in lowland areas, the uncertainty here is still significant. This partly reflects the uncertainty and associated variability in dry deposition schemes (e.g. Flechard et al., 2011).

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The range in deposition has an impact on the evaluation of exceedances of CLs. Table 3 shows the AAE and percentage area in exceedance for each model. The AAE varies by an order of magnitude, from 1.2 to 9.1 kg ha⁻¹ yr⁻¹, while the percentage area of in exceedance varies by a factor of 2.5, from 36.8% to 88.8%.

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Figure S2 shows the AAE and percentage area in exceedance for B2018 for each UK nation. Different conclusions can be drawn regarding the comparable scale of the problem between each region depending on which model is used.

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Table 3 also includes EMEP4UK predictions using 2018 emissions but 2003 meteorology data. We use 2003 as an example of a year when meteorology conditions were different to those in 2018, with the

306

307 contribution from other countries on mainland Europe particularly high. This comparison with
 308 EMEP4UK using 2018 meteorology suggests that while meteorology is a factor in predicting deposition
 309 rates and the resulting exceedances, it is significantly less than the difference between models.

310 Table 3: N_r deposition budget, Average Accumulated Exceedance (AAE) and % area of N-sensitive
 311 habitat in exceedance of critical load for B2018 as predicted by each model for the UK.

	EMEP4UK (2018 met)	EMEP4UK (2003 met)	UKIAM	CBED 17-19
N_r deposition (ktonnes)	182.6	172.3	212.3	273.9
N_r deposition on habitats (ktonnes)	66.9	68.9	104.2	156.1
AAE ($\text{kg}\cdot\text{ha}^{-1}\cdot\text{yr}^{-1}$)	1.3	1.2	4.5	9.1
% area in exceedance	36.8%	38.2%	60.9%	88.8%

312

313 3.2 Projected change in deposition and exceedances

314 The range of deposition estimates between models leads to a range in the estimated benefit achieved
 315 by different emission reduction scenarios. This is illustrated in Table 4 where we show the change in
 316 total deposited N_r (a) across the UK and (b) on sensitive habitat areas only, and also the associated
 317 changes in AAE and percentage area in exceedance. Maps of the AAE for the B2040 and H2040
 318 scenarios are shown in Figures S2 and S3.

319 For the B2040 scenario, EMEP4UK predicts a reduction of 9.6 ktonnes of N_r on sensitive habitats,
 320 compared to 9.2 and 16.2 ktonnes for UKIAM and E4UK-Scaled, respectively. For the H2040 scenario
 321 the reduction predicted by EMEP4UK, UKIAM and E4UK-Scaled is 14.0, 16.8 and 27.3 ktonnes
 322 respectively.

323 The differences in deposition estimates result in differences in both exceedance metrics (AAE and
 324 percentage area) but also the change relative to the baseline. For the B2040, the AAE is $0.7 \text{ kg ha}^{-1} \text{ yr}^{-1}$
 325 for EMEP4UK compared to 3.75 and $7.47 \text{ kg ha}^{-1} \text{ yr}^{-1}$ for UKIAM and CBED, respectively, while for the
 326 H2040 these values are 0.45 , 3.07 and 6.34 , respectively. Therefore there is an order-of-magnitude
 327 range for the AAE predicted for these scenarios. The range of around a factor 3 is seen for the
 328 percentage area in exceedance.

329 Table 4: N_r deposition budget, Average Accumulated Exceedance (AAE) and % area of N-sensitive
 330 habitat in exceedance of critical load by 2040 and change relative to 2018 for the 2040 baseline and
 331 High scenario for the UK. The percentages given in parentheses for the change in deposition and AAE
 332 is the % reduction relative to B2018.

		EMEP4UK (2018 met)	UKIAM	E4UK-Scaled*
B2040	N_r deposition (ktonnes)	164.2	180.8	233.5
	ΔN_r deposition (ktonnes)	-28.7	-31.5	-40.4
	As NH_x (ktonnes)	-3.9	-2.3	-5.5
	As NO_x (ktonnes)	-24.9	-29.2	-34.9
	N_r deposition on habitats (ktonnes)	57.3	95.0	139.9
	ΔN_r deposition on habitats (ktonnes)	-9.6 (-14%)	-9.2 (-9%)	-16.2 (-10%)
	AAE ($\text{kg ha}^{-1} \text{ yr}^{-1}$)	0.7	3.75	7.47
	ΔAAE ($\text{kg ha}^{-1} \text{ yr}^{-1}$)	-0.60 (-46%)	-0.75 (-17%)	-1.63 (-18%)
	% area in exceedance	29.8%	54.9%	83.8%

	Δ% area in exceedance	-7%	-6%	-5%
H2040	N_r deposition (ktonnes)	151.7	165.7	214.8
	ΔN_r deposition (ktonnes)	-41.2	-46.6	-59.1
	As NH_x (ktonnes)	-12.6	-12.2	-19.3
	As NO_x (ktonnes)	28.6	-34.5	-39.8
	N_r deposition on habitats (ktonnes)	52.9	87.4	128.8
	ΔN_r deposition on habitats (ktonnes)	-14.0 (-21%)	-16.8 (-16%)	-27.3 (-17%)
	AAE (kg ha⁻¹ yr⁻¹)	0.45	3.07	6.34
	ΔAAE (kg ha⁻¹ yr⁻¹)	-0.85 (-66%)	-1.43 (-32%)	-2.76 (-30%)
	% area in exceedance	25.8%	51.9%	80.8%
	Δ% area in exceedance	-11%	-9%	-8%

333 *E4UK-Scaled is used as a proxy for CBED for the future scenarios.

334 3.3 Path towards zero exceedance in England

335 We now focus on England in order to relate these results to the England N_r deposition and habitat
 336 protection targets. Our most ambitious scenario, the H2040, still leaves large areas of habitat in
 337 exceedance according to all models. We explore the degree of reduction in deposition required to
 338 eliminate all exceedance, and what the path to this point looks like, by reducing the B2018 deposition
 339 map by a uniform scaler across the UK until we reach zero deposition. Figure 5 shows how the
 340 percentage area of habitat in exceedance of CL_{rec} changes in England as deposition is reduced
 341 uniformly. Figure S6 shows the equivalent plots for the UK.

342 In reality the spatial distribution of deposition will change in future and does so for our future scenarios
 343 (B2040 and H2040). However, these plots provide a meaningful illustration of the degree of change
 344 required in order to significantly reduce the exceeded area of each habitat. The markers on each plot
 345 indicate the outputs of each scenario. In most cases these markers lie on the line of the corresponding
 346 model, showing that the plots are representative of the change in exceedance as deposition is reduced,
 347 at least for the scenarios assessed here. The EMEP4UK scenario markers for B2040 and H2040 are
 348 further along the x-axis than those for UKIAM and E4UK-Scaled, indicating a greater sensitivity to the
 349 emission reductions in the scenarios.

350 The shaded area indicates the range in model outputs. This range is large for all habitats, only
 351 converging where exceedances start at or near 100% or tend to zero where the deposition has been
 352 reduced substantially.

353 The rate at which the area in exceedance decreases varies between habitats. Woodland habitats such
 354 as managed deciduous, oak, beech and unmanaged mixed woodlands require greater reductions in
 355 deposition before significant gains are made in reducing the exceeded area, due to the enhanced dry
 356 deposition to forest compared to less aerodynamically rough vegetation.

357 The figure shows how the percent reduction in deposition predicted by one model can provide a
 358 significantly different estimate of the change in area of exceedance compared to what is predicted by
 359 a different model with the same percentage reduction in deposition. Despite the uncertainty in
 360 deposition, it is clear that in order to protect the majority of habitat areas a greater reduction in
 361 deposition is needed than the 17% target set in the Clean Air Strategy (Defra 2019) indicated by the
 362 black dashed line. For all habitat areas (lower right plot in Figure 5), with a reduction of 17% in
 363 deposition the area in exceedance is predicted to be 66%, 90% or 99% for EMEP4UK, UKIAM and E4UK-
 364 Scaled, respectively.

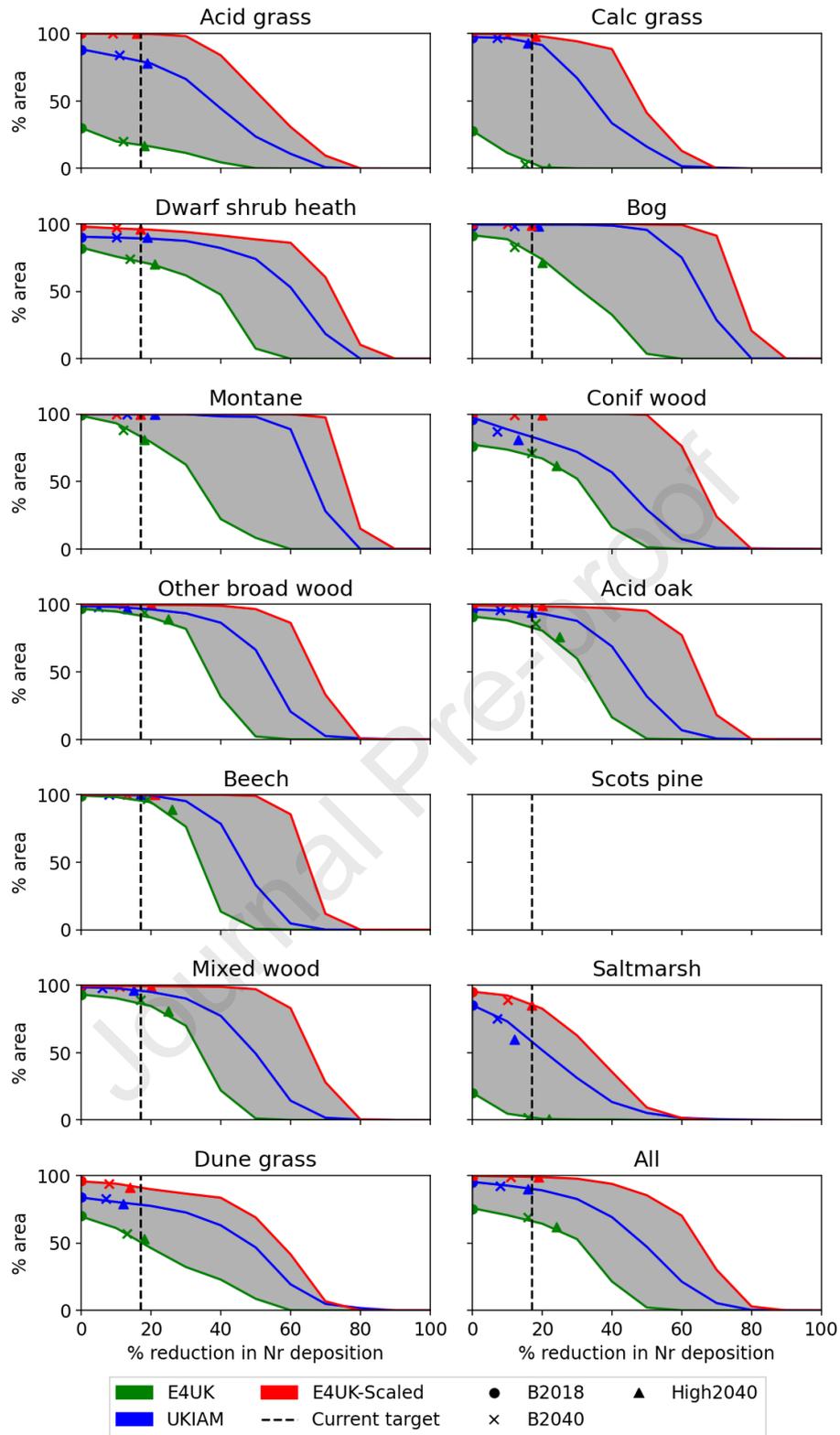
365 Both EMEP4UK and E4UK-Scaled predict that the H2040 achieves a reduction in deposition equal to or
 366 greater than 17% on these habitats, with UKIAM just short at 16% (Table 4). There are also protected

367 sites on priority habitats which can benefit from local measures to further decrease N_r deposition
368 (Dragosits et al., 2020), however this is not the case for broader habitats which cover large areas.

369 The percentage reduction in deposition needed to remove all exceedances of CLs varies between 50%
370 for EMEP4UK and 90% for E4UK-Scaled, with UKIAM on 80%. The ambitious technological scenario,
371 H2040, achieves a range of 16 to 22% reduction.

372

Journal Pre-proof



373

374 Figure 5: Percentage area in exceedance of CL_{rec} in England against percentage reduction in N_r
 375 deposition for each habitat and for all habitats. The plotted lines are derived by reducing N_r deposition
 376 evenly across England a percentage point at a time and recording the percentage area in exceedance.
 377 The shaded area is an indication of the degree of uncertainty as estimated by the range in model
 378 estimates. The markers indicate the position of each scenario on the plot for each model. The Scots
 379 pine plot is empty for England as it exists in Scotland only.

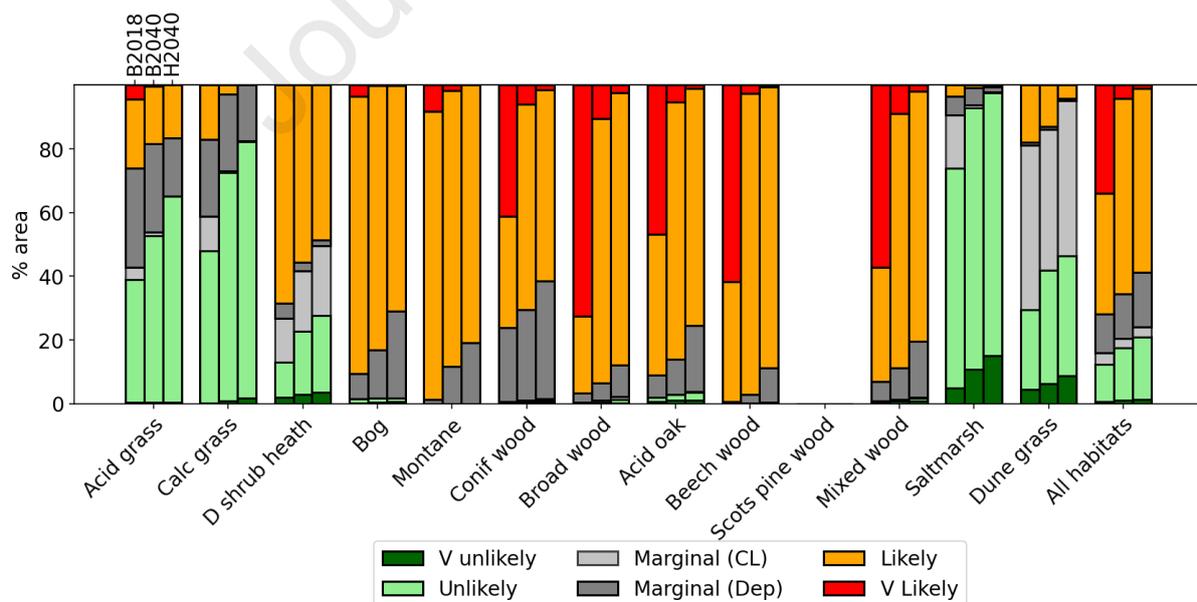
380 3.4 Taking a risk-based approach

381 Using the risk-based approach (Woodward et al., 2022) described in Section 2.5 provides an evaluation
 382 that is not solely dependent on one model and accounts for the range in estimates for both deposition
 383 and CLs.

384 Figure 6 shows the exceedance score areas for each habitat in the England for each scenario. There is
 385 considerable variation between habitats with woodland habitats in particular trouble. Scots Pine is
 386 entirely in Scotland and therefore no values are shown for England. The vast majority of area of these
 387 habitats are either marginal, likely or very likely in exceedance of its CL even for the H2040 scenario,
 388 with the plots on the far right showing the average across all habitats. Despite this, a steady
 389 improvement is seen for all habitats in terms of the proportion of habitat that is deemed likely (orange)
 390 or very likely (red) in exceedance, with the vast majority of the very likely category removed for H2040.
 391 Habitat area assigned to either the very unlikely (dark green) or unlikely (light green) in exceedance
 392 categories also see a steady progress for grasslands, dwarf shrub heath, salt marsh and dune grass.
 393 However not much progress is seen for these areas for woodland habitats, again reflecting the higher
 394 deposition rates to these habitats.

395 For England, the B2018 scenario has 12% of habitat area either very unlikely or likely in exceedance,
 396 and 72% likely or very likely in exceedance, with the remainder being marginal cases. This improves
 397 for B2040 and H2040, for which the proportion of habitat very unlikely or unlikely in exceedance is
 398 18% and 21%, respectively. The proportion either likely or very likely in exceedance is 66% and 59%,
 399 respectively, with the very likely category down to 1% for H2040.

400 Figure S7 shows the equivalent plot for the entire UK where a greater proportion of habitat area is
 401 either very unlikely or unlikely in exceedance. This is due to lower exceedances in Scotland where N_r
 402 deposition is lower and a large proportion of habitat area exists. In the UK, the B2018 scenario has
 403 46% of habitat area either very unlikely or likely in exceedance, and 32% likely or very likely in
 404 exceedance, with the remainder being marginal cases. This improves for B2040 and H2040, for which
 405 the proportion of habitat very unlikely or unlikely in exceedance is 52% and 55%, respectively. The
 406 proportion either likely or very likely in exceedance is 26% and 23%, respectively.



407

408 Figure 6: Percentage area of each exceedance score assigned to each sensitive habitat in England for
 409 all scenarios. The derivation of the exceedance score areas is described in Section 2.5.

410

411 4. Discussion

412 The analysis presented here illustrates the wide range of deposition estimates that can be obtained
413 from different UK models, EMEP4UK, UKIAM and CBED. The range in model estimates reflects the high
414 uncertainty that exists both in modelled and measured deposition rates. This poses a problem when
415 validating models and attempting to inform policy development and in particular target setting. Model
416 estimates of current and future CL exceedances are used to guide policy development, however the
417 range in deposition estimates between models often results in a range in exceedance estimates. This
418 is true whether an area-based metric (e.g. percentage area in exceedance) or an exceedance-based
419 metric (e.g. accumulated exceedance) is used (see Tables 3 and 4). While CBED is a semi-empirical
420 model and therefore is not capable of future projections (the scaling method from Woodward et al.
421 (2022) is used here to illustrate how CBED predictions could look like in 2040, denoted as E4UK-Scaled),
422 both EMEP4UK and UKIAM are used to model future scenarios in support of policy and target setting.

423 **Uncertainties in N_r deposition**

424 CBED was designed specifically to be independent of emission estimates as it is based on the
425 interpolation of measured concentrations in air and rain. By contrast, both EMEP4UK and UKIAM use
426 emission estimates. For NH₃, the NAEI estimates an uncertainty of 16% (Elliot et al. 2025) for the UK
427 total, larger for the spatial attribution. Constraints based on earth observation have suggested that
428 emissions may be underestimated by 30% (Marais et al., 2021), but this approach itself is subject to
429 similar uncertainties. On the other hand, CBED-specific uncertainties arise from the combination of
430 annual average meteorology with annual average concentrations to derive deposition (e.g. Schrader
431 et al., 2018).

432 Significant uncertainties exist in the parameterisation of dry and wet deposition in complex terrain
433 (Cowan et al. 2022) and this accounts for much of the differences in the model estimates as orographic
434 impacts on wet deposition are treated differently in the models.

435 Areas of higher altitude and precipitation are subject to additional atmospheric processes, such as the
436 seeder-feeder effect in which rain from high level cloud falls through lower “feeder” clouds which
437 typically contain higher concentrations of pollutants (Dore et al., 1992; Smith & Fowler, 2000). Accurate
438 modelled prediction of deposition in complex terrain requires a quantitative understanding of occult
439 deposition, orographic enhancement, the seeder-feeder effect, and highly localised rainfall. Model
440 resolution is a key factor for resolving orographic effects, since greater resolutions tend to obscure
441 topography. Cowan et al. (2022) estimate that the areas of complex terrain receive 1.4 and 2.5 times
442 greater deposition than areas of simple terrain – that is, deposition rates are likely 1.4 to 2.5 higher
443 than ACTMs currently predict. This enhancement is reflected to different levels in the different
444 measurement approaches and it is challenging to conclusively judge which is closer to the truth
445 because reliable measurements at high altitude are lacking. Wet deposition estimates are particularly
446 variable and uncertain for mountainous areas, where it is often challenging to maintain equipment to
447 monitor meteorology and the chemical composition of precipitation. High winds reduce capture
448 efficiency of deposition gauges. Until very recently, only two sites in the UK currently provided daily
449 measurements of wet-only deposition. At other sites, wet deposition must be estimated from long-
450 term bulk deposition measurements, which can overestimate wet deposition by 20-40% (Cape et al.,
451 2009), but current understanding is deemed too uncertain to apply correction procedures. Large
452 uncertainties also exist in dry deposition quantification in areas of complex terrain (i.e. turbulence
453 variability associated with irregular topographic features, such as mountains, coastlines, steep slopes,
454 cliffs or heterogenous vegetation cover). Particular measurement techniques must be applied, for
455 example measurement of occult deposition, i.e. the interception of cloud droplets by vegetation.

456 Model resolution is also a problem for dry deposition hotspots, which can occur at sub-grid scales of
457 tens of metres near point sources such as poultry farms. Lower resolution models may infer that the

458 average concentration of a large grid cell is too small to cause exceedances of CLs, whilst a higher
459 resolution model might identify areas of CL exceedance within that grid cell.

460 It should also be noted that organic forms of nitrogen are not currently included in any of the
461 deposition estimates (measured or modelled), but can contribute 20-40% to wet deposition (Cape et
462 al., 2005, 2012). The contribution of the organic component varies significantly between countries and
463 regions across the globe (Cornell, 2011), more research is needed to understand the spatial variation
464 within countries (Cape et al., 2011). While we have crude estimates for dissolved organic nitrogen, the
465 dry deposition of organic nitrogen compounds in the aerosol, though ubiquitous (Kiendler-Scharr et
466 al., 2016) is even less well estimated.

467 **The case for more ambitious targets**

468 Despite the uncertainty in our estimates, it is possible to conclude from the analysis that a greater level
469 of ambition is needed than the UK government's current 17% reduction in deposition target if the vast
470 majority of habitat area is to be protected in England. Our analysis suggests that achieving this target
471 (here represented by the H2040 scenario) would result in only 1-34% of habitat area below their CL
472 (Figure 5). While the risk-based approach (Figure 6) predicts that only 21% is very unlikely or at least
473 unlikely to be in exceedance, with the remaining area either marginal, likely or very likely in
474 exceedance.

475 Despite this, habitats can benefit from any reduction in deposition even when CLs remain in
476 exceedance (e.g. Stevens et al., 2011; Armitage et al., 2014). Therefore, reaching the 17% target will
477 still deliver some benefit in reducing the pressure on sensitive habitats. This is reflected in the
478 reduction in the accumulated exceedance (Table 4) and the proportion of area at greatest risk of
479 continued high exceedance (Figure 6) for the H2040 scenario. It should also be noted that ambitions
480 that go beyond the Clean Air Strategy have been expressed. Through Target 7 of the Kunming-Montreal
481 Global Biodiversity Framework (CBD 2022) the UK, together with >180 other governments, declared
482 its intention to reduce "pollution from all sources by 2030, to levels that are not harmful to biodiversity
483 and ecosystem functions and services". Taken literally, this would imply completely eliminating CL
484 exceedances by 2030.

485 To achieve a more ambitious target will require additional measures. In the UK, NH₃ emissions from
486 agriculture is the main contributor to N_r deposition and CL exceedances (Woodward et al., 2022). The
487 majority of these emissions is attributed to meat and dairy production (Defra, 2024), therefore
488 reducing meat and dairy production could lead to significant reductions in NH₃ emissions (Leip et al.,
489 2024). A reduction in meat and dairy is recommended in the UK's National Food Strategy (Dimbleby,
490 2021) to provide healthier diets, meet climate targets and reduce the impact on nature. The UK's
491 Climate Change Committee also advise that a reduction in meat and dairy production is necessary to
492 meet the UK's Net Zero target (CCC, 2020). Further exploration is needed of the synergies that exist
493 between reducing the impact of NH₃ emissions, climate ambitions and healthy diets, for example see
494 Leip et al. (2023).

495 A reduction in deposition of between 60-90% would be required to eliminate all exceedances. This
496 would require a significant increase in ambition. A significant reduction in the contribution from non-
497 UK sources would also likely be necessary. UKIAM estimates the contribution from other countries and
498 international shipping to the UK total N_r deposition in 2018 as 26% and 6%, respectively.

499 Finally, it is worth noting the limitations of CL exceedances as a metric when used to assess the harm
500 caused by N_r deposition. Critical Loads are typically derived from experiments which are not able to
501 capture the impact of long-term accumulation of N in the soil. Eliminating CL exceedances would not
502 by any means guarantee that habitats recover from changes and have already occurred. Similarly, there
503 is strong evidence that per kg of N_r deposited, gaseous NH₃ dry deposition is more detrimental than
504 wet deposition (Sheppard, 2011), which is not reflected in the current CL methodology. However, CLs

505 remain a useful metric of the varying resilience of habitats to N_r deposition and are therefore helpful
506 guiding policy.

507 **Implications for broader habitat protection targets**

508 Consideration is needed regarding the condition assigned to habitat areas that are in exceedance of
509 their CLs within the context of broader targets. For example, England's "30 by 30" target (Defra 2023),
510 also derived from the UNEP's Convention on Biological Diversity's Global Biodiversity Framework (CBD
511 2022). This target sets out to protect 30% of land in England from "loss or damage to important
512 biodiversity values" by 2030. Another example is England's target to restore or create more than
513 500,000 hectares of a range of wildlife-rich habitats outside of protected sites by 2042 (Environment
514 Act 2021 (<https://www.legislation.gov.uk/ukpga/2021/30/>)).

515 We have not accounted for the increase in habitat area in our future scenarios, i.e. the area of each
516 habitat remains the same from 2018 onwards. In reality we expect an increase in these habitat areas
517 resulting from these targets and from climate mitigation measures such as woodland creation and
518 peatland restoration. However, given the widespread exceedances across the UK, we expect that the
519 majority of habitat area considered by these targets will continue to be under pressure from
520 eutrophication and as a result continue to experience gradual changes in flora and fauna. This poses
521 the question as to whether these areas can reasonably be considered "restored" or "protected" in the
522 long term without significant progress in reducing the impact of N_r deposition.

523 It may also be necessary to consider habitat-specific targets. There is a clear and significant variation
524 in CL exceedance for each N-sensitive habitat considered here (e.g. Figure S5 and Figure 6). Woodland
525 species are particularly under pressure and will require greater policy ambition than, for example, acid
526 and calcareous grasslands to achieve significant increases in areas no longer harmed by N_r deposition.
527 If the impact of N_r deposition was to be considered within the evaluation of broader targets, a habitat-
528 specific approach would be necessary to ensure progress is made across all habitat types.

529 **Relevance to other countries and regions**

530 These uncertainties in deposition measurements and modelled predictions are not unique to the UK
531 (e.g. Williams et al 2018, Walker et al. 2019). International negotiations to reduce air pollution impacts
532 depend on model estimates to inform national targets. There is recently an increased emphasis on NH_3
533 by the UNECE's CLRTAP due to the limited progress in abating these emissions. New targets are being
534 developed for ecosystem protection from N_r deposition under the convention, making the accuracy of
535 the assessment of N_r deposition and CL exceedances an issue of international concern. Our analysis
536 for the UK and each UK nation demonstrates the importance of considering the uncertainty in
537 estimates and the range of predictions available from different models. This also applies to existing
538 international targets such as the European Commission's target of a reduction of 25% in CL
539 exceedances by 2030 relative to 2005 levels (European Commission, 2022b). While considerations are
540 ongoing regarding a 50% reduction target for accumulated exceedances for the Gothenburg protocol
541 revision (TFIAM, 2024).

542 **Using the exceedance score approach**

543 By using the exceedance score approach outlined in Woodward et al (2022) we are able to
544 demonstrate that our scenarios make steady progress towards reducing the risk of the harm caused
545 by N_r deposition for each habitat, despite the significant range of estimates between models. The
546 method could be used to derive targets for policy development. Our scenario analysis suggests that
547 eliminating the proportion of habitat area at greatest risk (very likely in exceedance) may be an
548 achievable target for the UK and England only, with only a small proportion of habitat area assigned
549 this category for the H2040 scenario. Targets within each nation could also be set for the proportion
550 of habitat area very unlikely or unlikely to be in exceedance. Together these would provide targets

551 which reduce the proportion of habitat area at greatest risk of harm, while also increasing the
552 proportion unlikely to be caused harm.

553 **5. Conclusions**

554 There is large uncertainty in estimates of reactive nitrogen (N_r) deposition in the UK. This was reflected
555 in the large range in model predictions, illustrated here by comparing three models used to inform
556 policy in the UK: EMEP4UK, UKIAM and CBED. This range in predictions makes a big difference for
557 future scenario assessment, where the impact of different policy measures was assessed by predicting
558 their impact on deposition rates. Scenario modelling is a key element of informed policy development
559 in the UK (e.g. ApSimon et al., 2023), and also plays an important role in international negotiations of
560 national air pollution emission ceilings, e.g. the Gothenburg Protocol. While we have assessed the UK
561 here, with a particular focus on England, the conclusions of this paper are likely relevant for other
562 countries. The UKIAM model uses the same approach as the GAINS model, while EMEP4UK is a high
563 resolution implementation of the EMEP model, both of which are used to inform CLRTAP negotiations.

564 We show that the range of model predictions results in a large range in predicted critical load (CL)
565 exceedances. A significant range was also seen for the degree of improvement predicted for future
566 scenarios, with the rate of improvement often of most interest to policymakers. This range in
567 predictions poses a challenge for developing sensible targets to reduce the harmful impacts of
568 eutrophication driven by deposition of atmospheric air pollutants. Despite this, our results show that
569 a greater level of ambition is required to reduce these harmful impacts if the majority of habitat area
570 is to be protected. For example, England's Clean Air Strategy target of a 17% reduction in N_r deposition
571 on sensitive habitats would leave 66 to 99% of N sensitive habitat area in exceedance according to the
572 modelled range considered here.

573 Removing all exceedance in England and the UK as a whole would require a 60-90% reduction in N_r
574 deposition on these habitats. Achieving a reduction of this order would require a step-change in
575 ambition, both within the UK and for other countries which contribute a significant proportion,
576 regarding NH_3 abatement. Further reductions are possible by considering non-technical measures such
577 as reductions in livestock production. Such an approach has clear synergies with Net Zero policy which
578 is an area of ongoing research.

579 Our risk-based approach provides a means to assess current and projected CL exceedances while
580 accounting for the range in deposition estimates and uncertainty in CL assessment. The approach could
581 be used to develop more robust targets, rather than depending on a single, highly uncertain estimate
582 of CL exceedance.

583 **Glossary**

584 Anaerobic digestion (AD)
585 Average Accumulated Exceedance (AAE)
586 Atmospheric Chemistry Transport Model (ACTM)
587 Convention on Long-range Transboundary Air Pollution (CLRTAP)
588 Concentration Based Estimated Deposition (CBED)
589 Critical Loads (CLs)
590 European Monitoring and Evaluation Programme (EMEP)
591 European Nature Information System (EUNIS)
592 Weather Research and Forecasting (WRF)
593 Fine Resolution Atmospheric Multi-pollutant Exchange (FRAME)
594 Joint Nature Conservation Committee's (JNCC)
595 National Atmospheric Emission Inventory (NAEI)
596 Nitrogen Decision Framework (NDF)
597 UK Eutrophying and Acidifying Pollutants (UKEAP)

598 UK Integrated Assessment Model (UKIAM)

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Highlights

- Uncertainty in reactive N deposition reflected in large range in model estimates
- Model predictions of current and future CL exceedances vary considerably
- Uncertainty should be factored into policy development
- Despite uncertainty, significant increase in ambition needed to protect habitats

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Declaration of interests

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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