# Department of Culture, Heritage and the Gaeltacht

*Key Issues consultation paper in relation to a Review of the use of Peat in the Horticultural Industry*

**Response from**

BORD NA MÓNA
Naturally Driven

**January 2020**

# 1 Introduction

Bord na Móna (BnM) welcomes the opportunity to respond and input into the *'Key Issues consultation paper in relation to a Review of the use of Peat in the Horticultural Industry'*, the "Consultation". Bord na Móna also appreciates the background work carried out by the Department and the agencies under it aegis that have fed into the Consultation document.

It is also interesting to note that this Consultation which is an output of the National Peatlands Strategy has been published in an environment where Climate and Carbon issues are very much at the fore. Notwithstanding, the important biodiversity value and range of ecosystem services provided by peatlands, it is perhaps timely to briefly contextualise emissions from all active horticultural peatlands in terms of the national inventory. Using EPA figures, it is estimated that carbon emissions from all the active horticultural peatlands accounts for approximately 0.08% of Ireland's carbon emissions. This figure is even more stark when compared against international aviation emissions, which are not counted in Ireland's national inventory – for example, if the Dublin – London route was allocated the same carbon budget as the total annual emissions from all the active horticulture peatlands, then the annual carbon budget for flights on this one route would be surpassed as early as the 14th of January each year.

Bord na Móna does appreciate, as this response illustrates, that the issue of peat harvesting for the horticultural sector is more complex than a simple metric or sound bite but involves delicate consideration of socio-economic factors, technical suitability alternatives, objective scientific research (including full life cycles analysis of proposed alternatives), education and communication to end consumers.

As requested, what follows below is BnM specific response to the Public Consultation Questions.

# 2 Response to Consultation Questions

**A. What are your views on what more could be done to support and enable the switch to peat free horticulture at Professional crop production level and consumer level?**

A broad response to this question extends beyond the Professional and retail consumer and requires consideration of the producers, their direct employees, together with the communities that benefit from the indirect and induced economic activity associated with the harvesting itself and the upstream/downstream supply chain.

Bord na Móna notes and welcomes the economic statistics detailed in the Consultation outlining the value of the Horticultural industry to Ireland and the role of peat in this sector; however, these figures are understandably, provided in aggregate across the State and hence fail to convey the socio-economic value the Horticultural Peat industry generates for these Midlands communities.

As noted in the Consultation, the Horticulture industry employs 6,600 directly and 11,000 indirectly in Ireland. It is estimated that approximately 50% of the total industry output of €437m is dependent on peat as a growing medium.

After energy generation and domestic fuels, horticulture has traditionally been the smallest (on average circa 10% of harvest) category for Bord na Móna peat. Bord na Mona Horticulture focuses on the manufacture, marketing and sale of quality growing media products. The outlets for these products are divided as follows:

- Over half of Bord na Móna horticulture peat is supplied to the retail market (hobby gardeners).
- The remainder is supplied to the Professional growers' market.

There are approximately 200 people directly employed by Bord na Móna in the Horticulture sector, a study prepared by *Jim Power Economics* calculated a multiple of *circa* 1.5 indirect & induced jobs are supported for each direct job in this sector, suggesting that our Horticulture business supports a total of 300 jobs in rural areas, predominantly the Midlands, which are traditionally the less developed regions within the country.

A narrower interpretation of this question, as it impacts two specific stakeholders, Professional and retail growers, can be answered with a single word – 'confidence'. Growers must be confident, that an alternative to peat, or mixes with non-peat diluents, will for the equivalent cost, deliver equivalent results to those that have been delivered by peat for the past number of generations.

However, this 'confidence' must be built upon strong foundations. There must be confidence that the proposed alternative is consistent from week to week & season to season, that the cost is affordable, the supply is reliable and that the product itself is effective for the task at hand. These foundations must also be buttressed with robust scientific evidence concerning the efficacy and sustainability of the alternative, and must also include a life cycle analysis of proposed alternatives on a like for like basis with peat, with the goal being the production of sustainable growing media. Growing Media Europe articulate a position that different materials have merits and disadvantages and that a general environmental ranking of Growing Media constituents, based on a single or a limited basket of criteria, is not advisable nor rationally sound, instead a holistic life cycle approach (with no initial bias) must be carried out, to ascertain the most sustainable and feasible growing media for any given purpose.

**B. What are your views on alternatives to the use of peat in the Horticultural Industry (from, for example, the perspective of the Professional grower or consumer/amateur gardener)?**

It is important to stress that Bord na Móna is a supplier to the market, and is neither a Professional grower nor amateur gardener, and notwithstanding our comments in response to Question A above, Bord na Móna as a commercial supplier, attempts in the first instance, to meet the needs and expectations of its customers.

Again, it is necessary to split out these two cohorts of customers, their respective expectations and the implications should those expectations not be met.

In relation to the amateur or hobby garden, the transition away from peat is already underway. In 2000 Bord na Móna's retail growing media business was 100% peat. Between 2000 and 2010, the company began to introduce additional diluents to retail ranges. As part of this transition process Bord na Móna also developed two green composting facilities and the associated collection/supply chains for the recycling of green waste from sources including;

- County Councils,
- Cereal by-product,

- food/drink producers, and
- other industries nationally.

Within the last year Bord na Móna produced 32,000 tonnes of green compost. Other diluents include coir and composted bark. The company currently supplies a mix of both peat and diluent in most of their growing media retail range.

The situation and risks for the Professional sector is well documented in the Consultation paper itself and Bord na Móna agrees with the general tenor of those comments. Professional users require a high degree of growing media consistency with minimum batch-to-batch variation. There are ongoing efforts in the industry to use peat free substrates, however due to their variability and lack of uniformity a suitable and economically feasible alternative is not yet available.

In conclusion, the direction of travel suggests that over time peat will be phased out of the retail market, however, considerable research (including robust life cycle analysis), product development, testing and marketing efforts will be needed before a roadmap can be produced that plots a similar transition away from peat for the Professional growers both in Ireland and abroad.

C. **What are your views on whether Ireland should cut back or cease the export of peat for use outside of Ireland even if this would result in job losses in Ireland?**

As noted, Bord na Móna has been on a journey that commenced over 20 years ago to cut back and ultimately cease the export of peat for the amateur/retail market overseas. While it is inevitable that there has been (and will be) job losses associated with this journey, the most negative impacts of the transition over this time period have been managed to minimise the impacts on workers. In the retail sector, the timescale for this transition has provided an opportunity for the company to research potential peat-free alternatives, develop green composting facilities and the associated supply chains and, for some workers, provide opportunities for redeployment.

It is also worth pointing out that Bord na Móna's reducing production of horticultural peat coincided with a commensurate increase in peatland rehabilitation, restoration and conservation activity. In this period the company committed to not developing any new bogs and the rehabilitation of all bogs exiting production. The company has to date rehabilitated 15,000 hectares of peatland and is currently developing a new peatland rehabilitation programme in line with its climate action and just transition commitments.

As noted in response to Question B above, the more exacting standards and commercial realities facing Professional growers is such that the journey to peat free alternatives, is in essence still at the 'research' stage. For progress to be made the initial focus of the proposed Working Group, discussed in the Consultation paper and below, should include a holistic examination (including full life cycle analysis) on the use of peat and the potential for alternatives in the Professional sector.

**D. Do you consider that a working group should be established to advise on how best to overcome the barriers to reducing peat use in Professional horticultural crop production and in the amateur horticultural market?**

Yes

**E. If you are in favour of the establishment of a working group, which stakeholder groups do you think should be represented on it?**

Bord na Móna would not be so presumptuous as to prescribe a definitive list of stakeholders for the proposed Working Group. However, it is expected that potential stakeholders would include policy makers, peat producers, NGOs, impacted Local Authorities, the Just Transition Commissioner, Midlands Transition Team and academia, in addition Bord na Móna would respectfully suggest that 'customers' (both national and international) are also represented on this Working Group. For this purpose, the definition of 'Customers' would include buyers from 'multiples' retailing product to the hobby gardeners, Professional growers that use peat as a growing media and industry representative bodies, e.g. Growing Media Europe.

**F. How do you think that those involved in harvesting peat for horticulture could be compensated for any loss arising from a cessation of this activity (for example, on the basis of the profit loss arising or related to the value in ecosystem services retained/provided)?**

In the first instance, there has been some international examples of schemes that compensated participants in the industry during an extended transition period of reducing and ultimately ceasing peat harvesting. However, this is a complex and multifaceted question, one that is best posed to the proposed Work Group to deliberate, consult on, assess and make possible recommendations.

**G. How do you think that those involved in harvesting peat for horticulture could be guided towards alternative activities, for example, developing an environmentally suitable alternative material that could replace peat in Professional horticultural crop production?**

On a point of process this question is premature as it prejudges the outcome(s) and possible recommendation(s) of the proposed Working Group.

Instead, it is respectfully suggested that this potential scenario be included in the Terms of Reference of the proposed Working Group.

**H. What do you consider the value of peatlands to be to - please score out of 100 – 'Carbon Storage; Nature Conservation; The Provision of Ecosystem Services; The Economy; Social and Cultural Needs)?**

As noted in the introduction question of the *use of Peat in the Horticultural Industry'* cannot be trivialised into soundbites or simplistic arguments; the request to subjectively assign quantitative values over a range of complex headings without a clear objective methodology is not a sound evidenced based approach for the development of policy.

**I. In your opinion should the use of peat within (i) the amateur horticultural market and (ii) the Professional horticultural industry be phased out over the next 3, 5, 10, 15 or 20 years and if so, how should this be done bearing in mind the potential job losses and the difficulties with alternative growing media?**

As noted in response to Question G above, providing a comprehensive answer to this question may be somewhat previous, in advance of any output from the proposed Working Group.

In reality, no phase out for either 'market' can be justly implemented in the absence of feasible alternatives that have been scientifically proven to be effective, commercially viable and whose characteristics and performance have been communicated and accepted by end-users in the respective markets.

By way of example (also detailed in the Consultation itself), it is noted that in other jurisdictions, the transition itself was well flagged to participants, the period for transition extend over 10 -20 years, and compensation / incentives were available to the industry participants.

In the interim however, there should be no cliff edge or sudden knee-jerk reaction by policy makers in summarily ceasing the harvesting of horticultural peat, in the same vein the continued harvesting of peat must be carried out in accordance with all the necessary consents and where appropriate under licence from the EPA.

**J. Does more need to be done to educate and build consumer awareness of peat free products which are available at retail level?**

Yes, but in doing so, there is a need for objectivity and honesty when communicating the characteristics and efficacy of the peat-free products in comparison to the products they have/will replace.

Should you require additional information or further clarification, please do not hesitate to contact us.

Yours Faithfully

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