Submission to the Department of Culture, Heritage and the Gaeltacht

In response to the Consultation Paper Reviewing the Use of Peat in the Horticultural Industry

On behalf of

SAP Nurseries, Garnavilla, Cahir, Co. Tipperary, Ireland, E21 HN88

31st January 2020

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About us

The SAP Group was established in 1971 at Carbury near South Allenwood. SAP takes its name from this beginning, South Allenwood Plantations being abbreviated just to SAP.

SAP Nurseries is Ireland's largest nursery covering a total of 160 hectares. This is divided into 10 hectares under container production and 150 hectares under field production. We are one of Irelands largest wholesale supplier of trees, herbaceous plants and shrubs.

SAP Landscapes is the largest Landscape and Ground Maintenance Contractor in Ireland. Our growth and success is always fuelled and underpinned by our commitment of delivering Customer expectations no matter the size of project. This slavish commitment to service delivery is verified by SAP's unrivalled awards history issued by both the Association of Landscape Contractors of Ireland and Bord Bia.

We use peat based substrates but have been incorporating wood fibre at 10% in our growing media in recent years.

Public 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?***

   Irish nurseries, such as ours, operate in an extremely competitive environment with thin margins. We are price-takers from our customers who are mainly international and domestic retail multiples who have easy access to very cheap plants from large scale specialist nurseries in the Netherlands and elsewhere in Europe that benefit from the economies of scale of production systems which focus on a limited line of crops.

Switching to peat-free substrates will introduce more complexity (water & fertiliser management), risk (lower yields, higher claims and returns) and cost (cost of substrate, higher water & fertiliser demands, shorter shelf life) into our processes and will make our nursery less competitive, particularly if Dutch and other European growers are not compelled to follow the same requirements. It makes no sense for Irish growers which already face massive competitive pressure to place themselves at a further competitive disadvantage to other European growers.

If Irish growers were unilaterally forced to use more costly and higher risk substrates they would need to have the substantially increased costs imposed on them offset by subsidies or higher selling prices in the market place in order to stay in business.

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)?*

From the perspective of professional growers, we require the supply of a reliable substrate which is of consistent high quality, with a good balance between water holding and free draining, that behaves in a predictable way and produces a uniform, homogenous crop with a long shelf life. Peat based substrate meet this criteria. If alternative materials can meet the required parameters of professional growers and are similarly priced, we will have no hesitation in using such alternatives. However, from the awareness we have of peat alternatives they come at higher costs, are more difficult to work with, introduce additional risks and supply may be intermittent (e.g. deliveries of coir held up due to monsoon conditions).

We are accepting of change and are willing to trial alternatives particularly where peat is still the main ingredient. However, we are not willing put our crops and livelihoods in jeopardy using peat-alternatives which are not reliable or are unproven.

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?*

Horticultural nurseries are a relatively small sector of the economy in Ireland so it is doubtful whether any substrate manufacturer would base themselves in Ireland to serve such a small market, if they were unable to export.

If Irish nurseries had to order from UK or continental substrate producers they would face substantially increased costs and longer lead-times.

Generally we can order from our Irish based substrate producer and receive a delivery within a few days of order. Such flexibility is important for our business as planting schedules may change at short notice in response to changes in weather conditions and the requirements of retailers.

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. We expect that Irish growers would benefit from learning more about alternatives to peat, and the particular advantages and disadvantages of these alternatives vis-à-vis peat.

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

Retailer groups, grower representative groups, substrate manufacturer associations, environmental NGOs, Teagasc, Bord Bia, Bord na Móna, DCCAE, DCHG, NPWS

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)?***

If cessation were imposed then it would be appropriate that operators be compensated for the value of profits foregone from the inability to harvest the peat resources remaining in their lands.

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?***

We assume that it is availability of peat in Ireland that provides the raison d'etre for manufacturers of horticultural substrates to locate in Ireland, away from the large horticultural markets in the UK and the EU.

If peat were not the main component in horticultural substrates, presumably manufacturers would not maintain operations in Ireland.

It would not make sense for manufacturers to import alternative materials just to process in Ireland and re-export to those large markets elsewhere. The transport costs involved in moving bulky material in and out of Ireland would presumably be prohibitive.

H. ***What do you consider the value of peatlands to be to (please score out of 100):***

carbon storage	20
nature conservation	20
the provision of ecosystem services	20
the economy	20
social and cultural needs	20
	100

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?***

It has taken our business decades of tweaking our different peat based substrate recipes to come up with an optimum portfolio of mixes for various crops. For us to gain the same level of confidence in using alternative materials would involve very gradual changes to existing recipes, slowly reducing the peat content each season as we become familiar with the reconstituted recipes and learn about the different irrigation, fertiliser etc. requirements. We would therefore want the longest possible lead in time to any such proposed change (15 to 20 years would not be unrealistic).

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

Yes, there is certainly a need for further education/ information for both consumers and professional growers. Consumers need to be able to understand the costs and benefits (including environmental costs) of peat alternatives so they can properly evaluate and compare with peat.

Consumers and professional growers want to know that the bag they purchase will successfully grow their plants and that the producer has considered the environmental impact of the product they purchase.

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