

**C . M . P**

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Dear Sir / Madam,

Please find attached our response to the questions in the 'Key Issues Consultation Paper', A Review of the use of Peat in the Horticultural Industry.

Commercial Mushroom Producers Co-operative Society Ltd (CMP) is Ireland largest producer organisation. We market our members fresh mushrooms from their 20 farms in the Republic of Ireland. As an EU recognised producer organisation, we are constantly working with our members through an approved operational programme to improve our performance in the areas of planning, quality, marketing, research and development, technical improvement and environmental measures. We have been investing in environmental measures for twenty years. In the last ten years we estimate that we have almost halved the carbon used for energy for production output, through a combination of investing in renewable energy and productivity gains. We are committed to further environmental investments and measures in our new five-year operational programme.

Most of our members farms are located in the Border and Midland region. These farms are large employers in the rural economy. Mushroom production is a circular economic activity using local ingredients and resources including poultry litter, straw, casing peat with a high labour content.

We estimate that our farms will produce over 32,000 tonnes of mushrooms in 2020 with a value in excess of €83 million, of which c.95% is exported to the UK.

Yours sincerely,

  
CEO

Bert Stewart (Chairman), Michael Costello (Vice-Chairman),  
Cathal Reilly (Secretary), Donal McCarthy (Chief Executive Officer)  
Company Reg No. 5042R

## 10. 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?

*The consultation document (section 5) suggests several alternatives for certain horticultural sector users.*

*We suggest below a number of possible supports that could enable such a transition. However, we would urge that adequate scientific and commercial analysis be done in advance to ensure that alternatives:*

- a) do not result in a higher carbon and environmental footprint than using locally sourced peat*
- b) do not result in currently exploited peatlands being abandoned by commercial operators due to restrictions, thereby losing the opportunity to regenerate peatlands where possible after period of peat extraction, under appropriate licensing regulations*
- c) do not put at risk Irish mushroom industry due to non-availability of a vital input or where casing peat must be imported increasing the costs and environmental footprint and putting the Irish mushroom industry at a competitive disadvantage*
- d) include an assessment of CO2 capture using peat to grow crops and*
- e) include an assessment of environmental benefits of using spent mushroom substrate on arable land*
- e) include an assessment of environmental, societal and economic gains from growing food and amenity crops in Ireland*

### *Possible Supports*

- *Fund research into alternative materials*
- *Fund capital investment into producing 'synthetic' peat substitute trials and assess viability*
- *Subsidise use of alternatives, where usable and where there is an environmental gain versus using peat*

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)?

*Regarding the mushroom sector, there are no current viable alternatives to provide a 'casing'<sup>1</sup> layer for growing mushrooms. Section 6 of the consultation document outlines the unique properties and benefits of peat for horticultural usage. We wish to stress that for the mushroom industry, alternatives discussed in Section 8 are not viable for mushroom production. Peat is not acting as a substrate in mushroom production, and alternatives discussed such as coir, green compost, composted bark and wood fibre are not viable as a casing layer for mushroom production.*

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<sup>1</sup> den Ouden, 2017

*Research into the production of alternative casing materials have not yet found a viable alternative. The production of such alternatives is not 'carbon free'. Any alternative material, whether natural or 'synthetic' will have its own carbon and environmental footprint. There is a danger that alternatives will in fact have a larger environmental footprint than locally sourced peat from appropriately licensed and sustainably managed peatlands.*

*Unavailability of peat from Irish sources for the mushroom industry in the future, will likely result in the importation of casing peat from other EU countries at a higher environmental and financial cost than using Irish peat from appropriately licensed and managed sources. It will place the Irish industry at a competitive disadvantage. Allied to the risks surrounding Brexit and access to the market for c.80% of Irish production, it is not clear if the Irish industry would survive such loss of a critical input.*

*CMP has undertaken research and are actively implementing a project to reduce the use of casing by as much as 33%. The Irish mushroom industry over the last 10 years has substantially reduced its carbon footprint as a result of the use of renewable energy and increased productivity. We anticipate that this trend to lower carbon usage per unit of output will continue.*

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?

*We do not have a fixed opinion on this. We note from the consultation document that considerable exports are destined for the UK. It is important to note that the mushroom industry in Ireland, Northern Ireland and the UK is highly integrated. Much of the UK industry is owned by Irish companies. We should be cautious about taking measures that may damage these Irish headquartered companies.*

*In addition, we should consider whether such a move to cease or restrict peat exports will in fact have any wider environmental gain. Alternatives to peat will have their own environmental footprint, and the import of peat from Baltic or Scandinavian countries to the UK is likely to have a higher carbon and environmental footprint than peat imported from Ireland.*

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. Such a group must have as part of its remit an understanding that there may be uses where alternatives are either;*

- i. Unavailable for technical reasons*
- ii. Unavailable for food safety reasons*
- iii. Likely to have a higher environmental effect / cost than use of Irish peat from appropriately licensed sources*

*We understand that other EU countries have appropriate licensing and environmental management schemes in place. Some of these envisage continuing use of peat in the horticultural industry.*

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

*It is critically important that meaningful representation is present from the horticultural sector in Ireland, both edible and non-edible. Stakeholders should include mushroom growers, other edible and non-edible crop growers, producer organisations, representative bodies, produce marketeers, peat extraction companies, academic and research expertise and relevant government input.*

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)?

*As we are not involved in extraction process, we have not developed any ideas on this. We feel it is important that employment is maintained in rural area where peat is extracted. The rehabilitation of used peat bogs will require local labour familiar with the local peatland environment. This should be an opportunity for those displaced from peat extraction and / or onstream activities to gain future sustainable employment.*

*Is there an opportunity to reward landowners for CO2 stabilisation and further CO2 sequestration, as opposed to removing peat and associated CO2 loss?*

*We need to see concrete measures to ensure that a just transition does occur.*

*It is important to realise that steps to introduce arbitrary or non-research-based deadlines on use will have implications well beyond those directly involved in peat extraction and peatland management. Horticulture is the fourth most important sector in Irish agriculture and mushrooms is the most valuable element of commercial Irish horticulture. Inappropriate decisions on peat extraction, even if for the best of motives will put at risk a valuable export orientated industry located in the Borders and Midlands regions.*

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?

*There are real challenges for current players being involved in developing alternative materials.*

*Development of alternatives materials to peat are likely to be established either:*

- *nearer to the users of the product or*
- *nearer to where the new raw materials will be available.*

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
	<b>100</b>

The above headings have an element of “motherhood and apple pie” about them. They are all desirable. From the point of view of our growers, we are concerned with the sustainability of their businesses and their employee’s jobs. Obviously, we wish to do this in a responsible and environmentally sustainable manner.

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?

We are not in a position to comment on the amateur horticultural market. We would repeat our comments made above in response to Question A.

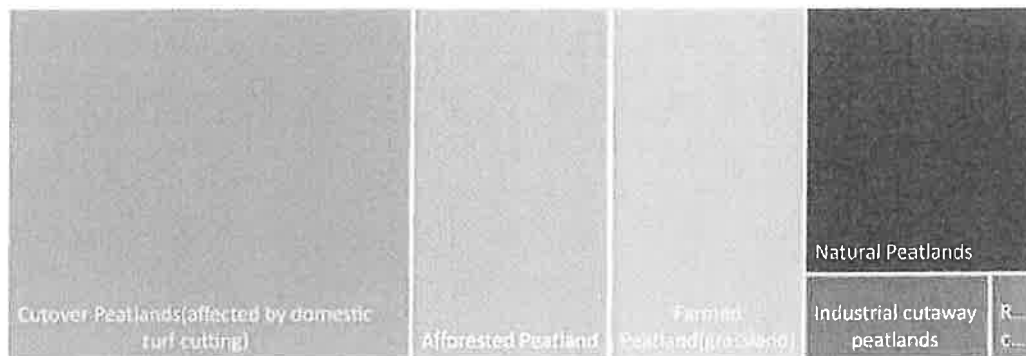
CMP clearly understands its obligations to reducing the CO2 emissions from the growing of mushrooms. If this is not done with the correct environmental, societal and economic information, we are in danger of damaging or wiping out a rural based industry for no environmental gain. Importation of peat, or the foods partly grown on peat is likely to have a higher CO2 footprint than locally produced mushrooms using local sourced peat from licensed and environmentally managed peatlands.

The consultation document on Page 5 and Page 6 has a total 1,564,650 hectares of peatlands. The entire area used for the horticultural industry is c.5,500 hectares, i.e. 0.35% of the total, and is less than 10% of the industrial cutaway peatlands. Mushroom casing peat represents a very small fraction of these 5,500 hectares. It is likely to be no more than 10 hectares annually.

**Distribution of the main land use categories of peatlands. (National Peatlands Strategy 2015 – Pg. 5 & 6)**

Natural Peatlands	269,270	ha
Cutover Peatlands (affected by domestic turf cutting)	612,380	ha
Afforested Peatland	300,000	ha
Farmed Peatland (grassland)	295,000	ha
Industrial cutaway peatlands	70,000	ha
Rehabilitated cutaway	18,000	ha

Distribution of the main land use categories of peatlands



*While we are not experts in the management of peatlands, it does appear that there are enormous opportunities to rehabilitate vast hectares of cutover peatlands and industrial cutaway peatlands to be carbon sinks<sup>2</sup> in the future. If this can be combined with effective licensing and environmental management of current developed peatlands, there are opportunities to have substantial environmental and carbon sequestration improvements, while maintaining a viable and resilient horticultural supply industry into the future.*

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

*We understand that consumers have available peat free growing media products, reduced peat growing media products and peat products. Accurate CO<sub>2</sub> emission measurements for peat and peat alternatives would be useful to assist consumers.*

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<sup>2</sup> Renou-Wilson, F., C. Bullock, C. Farrell D. Wilson, and C. Müller. Carbon Restore – The Potential of Restored Irish Peatlands for Carbon Uptake and Storage. Johnstown Castle, Co. Wexford prepared for the Environmental Protection Agency (EPA), 2007.

Submissions may be made in relation to these questions and/or on any other issue considered relevant.

Yours sincerely,



CEO  
Commercial Mushroom Producers Co-operative Society Ltd.