

**John B. Dockrell Limited**  
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**31<sup>st</sup> January 2020**

**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**

**About us:**

John B. Dockrell Limited is one of Ireland's leading producers of lettuce and we are committed to customer service and consistent supply of our produce for the whole season.

We have been growing horticultural crops since 1976 from our Dublin and Wexford sites and more recently we have expanded into County Carlow. Our land base is spread over these three counties principally to minimise our risks and give us a spread of suitable soils, favourable climate and extend the seasonal availability of our produce.

We use peat based blocking substrates for propagating our salad plants. The consistent reliability of the substrate we use at the propagation stage is a key ingredient in ensuring we produce excellent homogenous lettuce crops year after year.

**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?***

To propagate lettuce it is essential to have stable consistent blocks that can be planted out into our fields without breaking when being planted into the soil. We use semi-automatic planting machines which are only designed to use peat based blocking substrate. Clearly planting by hand is not an option. To our knowledge there is no peat-substitute that will provide the consistent stability of peat based blocking substrate, though we have successfully trialled a blocking substrate with 10% wood fibre.

Without the use of peat-based blocking substrate it would not be feasible to grow lettuce, either indoors or out in the field. If we were to revert back to planting directly into the ground without the use of blocking substrate there would be huge rise in plant mortality and at least four

months of the growing season would be lost. It would not be possible to plant out until the end of March and the crop would not be ready until August – we would have missed most the season and have grown only one crop.

Irish nurseries, such as ours, operate in an extremely competitive environment on 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 (or even peat-reduced) substrates (if available) 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 UK, Dutch and other European lettuce 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 UK and 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 stable, blocking 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 lettuce 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, we have no knowledge of the existence of a peat-free blocking substrate but have trialled a 10% peat-reduced substrate with reasonable results. From our knowledge of other crop sectors we have an awareness that peat alternatives 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).

The development of seed tape has been trialled in professional settings but currently it is not possible to grow a homogenous crop with the tape and the investment required to switch to such a system is prohibitively expensive. The problem with an inhomogeneous crop is that so much of the crop would fall outside the specifications required by the supermarkets, that the whole crop would become uneconomic to produce.

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. Blocking substrate is a very heavy product (500kg+ per cubic metre). The transport costs for importing such a heavy product into Ireland would make it uneconomic to produce lettuce in Ireland.

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.

It is most likely that without a local supply of peat based blocking substrate the propagation of lettuce and other vegetables (mushrooms, cabbage, celery, carrots etc.) would become uneconomic so a compensation would be required more widely than just for the peat harvesting sector.

**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?**

As far as we are aware there is no alternative to peat based blocking substrate. We would be willing to test the boundaries of peat dilution, as mentioned 10% has proved possible but greater dilution levels would need to be tested to ensure the stability of the block beyond 10% peat dilution with wood fibre.

For us to gain the same level of confidence in using alternative materials would involve very gradual changes to our existing blocking recipe, slowly reducing the peat content each season as we become familiar with the reconstituted recipe and learn about the impact on stability, water holding, 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.

If there is to be a switch to peat free products it would be very helpful if retailers and consumers were educated to become more accepting of inhomogeneous crops of fruit and vegetables; a crooked carrot or lettuce tastes just as good a regularly shaped ones.

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.

***For further information please contact:***

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