

National Peatlands Strategy Co-ordination Unit
Peatland Issues and Land Designation Section
National Parks and Wildlife Service
Department of Culture, Heritage and the Gaeltacht
90 King Street North
Smithfield
Dublin 7

Sent by email to: peatinhorticulturereview@chg.gov.ie.

24th January 2020

RE: REVIEW OF THE USE OF PEAT IN THE HORTICULTURAL INDUSTRY

To Whom It May Concern,

An Taisce welcomes the opportunity to comment on the review of the use of peat in the horticultural industry.

We regret to advise that the consultation as framed is not fit for purpose in its failure to address the urgency of the overlapping climate and biodiversity loss impact of horticultural peat extraction and the complete evasion of the peat compost industry of regulation including environmental impact assessment compliance over decades.

Please acknowledge our submission and advise us of any further consultation periods.

Yours sincerely,



Head of Advocacy

An Taisce – The National Trust for Ireland

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RECOGNISING THE SCALE AND ADVERSE IMPACTS OF THE PROBLEM

The scale of extraction

In addition to peat compost use within Ireland, including for mushroom substrate, the information provided with this consultation estimates that over 750,000 tonnes of peat annually are exported to UK, other EU countries and further abroad so that: *"the vast majority of peat extracted in Ireland for horticultural use is being exported to markets outside Ireland and there is growing need to consider long term viability and sustainability."*

The multiple adverse impacts

The process of obtaining peat compost is entirely destructive and extractive involving surface vegetation removal, drainage, and progressive extraction. A recent trend by some of the private sector peat compost extraction companies has been a move from the type of milled peat extraction carried out by Bord na Mona, to the use of heavy machinery with temporary metal plate tracks to scoop out the entire peatmass area of a raised bog with no consideration or concern for afterlife rehabilitation as shown in the photograph of a site in County Westmeath below.



Peat extraction in Westmeath

The science is clear on the carbon loss and other adverse impacts of peat extraction. This has been communicated in the 2011 EPA Funded BOGLAND Sustainable Management of Peatlands Ireland¹.

¹ <http://erc.epa.ie/safer/iso19115/displayISO19115.jsp?isoID=236>

The BOGLAND report provides *"large-scale analysis and findings that demonstrated that the Irish State needs to change the way in which the peatland resource is currently viewed and managed if it wishes to secure the multiple benefits offered by these natural ecosystems and avoid the costly consequences of further unsustainable management of peatland."*

Relevant to horticultural peat extraction, the BOGLAND report set out the following overarching considerations

- *"There is no public awareness of the relationship between peatland and carbon and the contribution of peat extraction to climate change.*
- *The value of peatlands as an ecosystem providing crucial ecological, hydrological and other services has generally been disregarded by the public, mainly because it was not communicated in any meaningful way.*
- *There appears to be a willingness amongst many people living in local communities to participate in the future after-use of industrial peatlands. These preferred after-uses include amenity, wildlife and wind energy options. However, there does seem to be a need for government or national institutions to take a lead in demonstrating what peatland afteruses are being seriously considered."*

The BOGLAND project stated that it *"revealed not only the global significance of Irish peatlands and the dilemmas of peatland management and utilisation but also engaged the general and local public as well as stakeholders in peatland discussions.*

It also stated that its collation of information *"provides a strong scientific and socio-economic evidence base, ready to be translated into instruments to assist decision making. In that regard, an action plan or set of recommendations is presented, with the aim of managing peatlands sustainably.*

The BOGLANDS report set out *"10 critical recommendations emerging from this protocol and requiring immediate actions by the Government"*

The first and overarching was:

"A much needed National Peatland Strategy A National Peatland Strategy is clearly required if the proposed protocol for sustainable management of peatlands is to be implemented. The ensuing National Peatland Policy should be integrated into other government policies, such as the Climate Change Policy, the Renewable Energy Policy, the Strategy for Invasive Species and the Water Framework Directive. The Peatland Strategy would be subject to the requirement of the Strategic Environmental Assessment Directive."

This did not occur. The 2015 National Peatlands Strategy, which was adopted by Government, did not provide the required protocol, resources, time tables and targets for

the sustainable management of peatlands, rather deferring management to vested interests. Years have been wasted in inaction on developing peat compost alternatives with continued failure to take legal enforcement.

Recommendation 6 of BOGLAND 2011 set out an overarching consideration in relation to carbon management:

"Management of non-designated peatlands to stop carbon loss and opportunities to restore degraded non designated peatlands should be immediately explored as protected peatlands are only a minor part of the total area of peatlands. Carbon is constantly emitted to the atmosphere from drained peatlands and several management options should be explored, for example: (i) Restoration of degraded non-designated peatlands should follow an adaptive management approach as each site is different in terms of site condition (e.g. how deep it is drained), historical disturbance, geographical location (catchment), ownership and local demands; and (ii) Water management in degraded peatlands should be optimised (reduce drainage) in order to combat carbon dioxide emissions from peat oxidation and preserve the palaeo information within the peat."

From 2027, carbon loss and gain through land use, land use change and forestry activity will have to be fully accounted for under EU climate emissions calculation. Climate action requires cessation of peat extraction for all types of use whether it be compost, energy or heating.

Irish ruminant animal agriculture is making much of its potential to offset emission through carbon management grasslands. The carbon loss of degradation of peatlands for horticulture to be accounted for and the cost borne.

The failure of legal and EIA regulation

There is no Environmental Impact Assessment and planning compliant horticultural peat extraction site operated either by Bord na Mona or the Irish, UK and continental European companies involved.

Recommendation 11 of the BOGLANDS report 2011 stated:

"The Environmental Impact Assessment Directive specifies that thresholds do not preclude sensitive areas and as such peatlands are to be considered sensitive areas for any development and thus require an EIA. It is therefore recommended that all commercial peat-cutting enterprises (i.e. no threshold) should require planning permission (and therefore an EIA). Enforcement action against unauthorised peat extraction should be pursued."

This did not occur. Years of non-enforcement with some belated action by the EPA were followed by collusion with the peat industry lobby in advancing regulations to accommodate continuing extraction.

The EPA IPCC licence held by Bord na Mona is not based on an Environmental Impact Assessment process that addresses all of the impacts arising, and does not resolve any exit date and after life strategy for the bogs affected. The other companies involved in extraction are outside any regulatory control, to the extent that there is not even a register of the extent and annual tonnage of extraction from the different sites involved.

What is an entire extractive industry is unregulated. The attempt by the Department of Housing, Planning and Local Government to introduce regulations in 2019 to accommodate continuing extraction were struck down in a High Court action by Friends of the Irish Environment.

Comparison to applying the substitute consent regime introduced for quarries in Ireland to horticultural peat extraction is not relevant. Unlike quarry material supply, which is required for construction, there is no sustainably case for accommodating continued peat extraction. Furthermore it should be noted that the entitlement in Irish legislation to give non-EIA compliant quarries automotive entitlement to seek substitute consent is being challenged by An Taisce in two linked Supreme Court appeals scheduled for hearing on 27th January 2020.

Furthermore, new or continuing peat extraction for compost cannot be justified under Environmental Impact Assessment as shown by the An Bord Pleanála refusal of continuing peat extraction for West Offaly Power Plant proposal refused by An Bord Pleanála in 2019².

The failure to develop extractive compost alternatives

Recommendation 17 of the BOGLANDS report stated:

“The Government should engage in a review of the use of peat in the horticultural industry and actively promote the use of peat-free horticultural growing medium in the market on the basis that these are sustainable products. While there is not at present a technically, environmentally suitable alternative material that could replace peat in professional horticultural crop production, Ireland should lead research in this area and economic incentives should be applied to compete with non-sustainable horticultural peat.”

No action has been taken to follow up on this since 2011.

There is a major question to be asked regarding the role of Teagasc (which is the legally mandated State body for horticultural research) as to why it has not led effective research action and solutions on alternatives to peat extraction.

² An Bord Pleanála refusal of continued operation of West Offaly Power Station:
<http://www.pleanala.ie/documents/orders/303/D303108.pdf>

Bord Bia is exposing Ireland to reputational damage by giving "Origin Green" certification to grow mushrooms which use substrate with extracted peat compost as part of the cultivation process.

Development of sphagnum cultivation has been extensively resourced in Germany with significant ongoing published research³, there is no information on any serious research in Ireland.

As a State company, Bord na Mona should be at the forefront of developing and promoting peat-free products. We note that at the Bord Bia Bloom event in June 2019, 19 of the 20 bagged products exhibited on the Bord na Mona exhibition area contained peat.



Bord na Mona exhibit with peat compost at Bloom 2019

THE INADEQUACY OF THE ISSUES RAISED AND RESPONSE PROPOSED THE DCHG CONSULTATION DOCUMENT

The consultation request is accompanied by an Issues Paper, which fails to address the climate and biodiversity loss emergency.

³ G. Gaudig, M. Krebs and H. Joosten, Sphagnum farming on cut-over bog in NW Germany: Long-term studies on Sphagnum growth:

http://mires-and-peat.net/media/map20/map_20_04.pdf

It does not communicate the urgency and scale of response required.

It does not address the unsustainability of allowing the multiple adverse climate and land use impacts of peat extraction to continue.

It does not address the failure to regulate horticultural peat extraction for decades, or the fact that there is no legal basis under the Environmental Impact Assessment and Habitats Directive for continued extraction.

The suggested response in the consultation document is vague and ineffectual in proposing: "*Education and community interaction...*" and "*Engaging in publicity to inform the public about the downsides of using peat moss as a growing medium... to encourage the producers to steer away from peat as growing medium and encourage them to develop sustainable alternatives*" (pages 12 and 13).

WHAT THE KEY CONSIDERATIONS AND RESPONSES SHOULD BE

RECOGNISE THAT THERE IS NO FUTURE FOR HORTICULTURAL PEAT EXTRACTION

The overarching question should be what is the future use of peat extraction in the horticultural industry, the answer being that there is none as much as the burning of peat for energy.

HOW ARE EXTRACTION SITES TO BE REMEDIATED BOTH LEGALLY AND PRACTICALLY TO STOP CARBON LOSS

How are the obligations of the Environmental Impact Assessments, Habitats and Water Framework Directives and climate action to remediate extraction sites to stop carbon loss to be met by the companies which have profited from horticultural peat extraction and left damaged sites now requiring remediation?

HOW CAN COMPOST NEEDS FOR FOOD PRODUCTION AND HORTICULTURE GENERALLY BE MET SUSTAINABLY?

As with the cessation of peat burning for electricity, there is the question of employment loss, remediation of extraction site impact, and sustainable alternatives

Ireland needs to significantly increase indigenous fruit and vegetable production, which will require suitable compost sources.

The current heavily peat-based, short-life, throw-away model of ornamental plant production is no longer sustainable on multiple grounds therefore requiring alternative models.

RESPONSE TO QUESTIONS ACCOMPANYING CONSULTATION

The questions fail to communicate any urgency or effective action with the only specific response suggested being stakeholder engagement and a working group with no actions, timetables or target. The document also completely evades consideration of liability for environmental damage.

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?

An immediate restriction on compost produced from peat extraction is necessary. Vague consideration of "support" measures is ineffectual. The horticultural industry has been given ample opportunity to develop non-extracted peat products and phase out peat use. It must now bear its responsibility to do this.

At industry and consumer levels, there is no case for continued use of peat compost for non-food crop horticulture. An immediate substitute is needed for the current use of peat compost in food production. This is an obligation that needs to be borne by the horticultural industry

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)?

The onus is on the horticultural industry to cease use of compost from peat extraction and produce sustainable alternatives within Ireland and not be reliant on imports. The horticultural industry has abrogated this responsibility over the last decade and must now address the consequences.

It is important to ensure that sustainability criteria apply to all alternatives.

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?

There is no sustainability case for any continued peat export.

The job losses from machine extraction on bogs require application of Just Transition principles on the same basis as ending peat use for energy.

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?

A "working group" without a legally mandated obligation to cease peat compost extraction is a guarantee of ineffectuality.

The horticultural industry must now face the consequences of evading regulation and resisting legal enforcement, cease use of peat extraction compost for non-food plant propagation, and provide alternatives for any food crop use of extracted peat.

The peat extraction supply source to the "*amateur horticultural market*" should simply be terminated. The amateur market should instead be supplied with locally sourced compost and composting of biomaterial at community or area level and by individual gardeners.

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

We consider that the "working group" envisaged in the framing of the previous question is not fit for purpose.

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)?

The question should be reframed. Landowners and companies, which have been responsible for and profited from the damage caused by peat extraction, need to bear the financial liability for remediation.

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?

The issue is analogous to energy companies extracting and trading in fossil fuels that will need to be left in the ground to meet the global carbon budget. If an energy company wants a future, it will need to be based on finding alternative to fossil fuel use.

Peat harvesting companies will simply have to provide non-peat compost alternatives to supply the horticultural industry since the issue of accommodating continued extraction should not arise. If a company wishes to be a compost producer it should have to meet sustainability standards, which would include exclusion of peat compost.

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

The framing of this question and attempt to set value sets between the climate and ecosystem is inappropriate. The maintenance of human society and the economy, which is a subset of society, is contingent on maintaining the climate and ecosystem.

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?

Peat compost sales to the amateur market can and should be subject to immediate restriction. Providing different phase out dates simply allows the continuation of an unsustainable activity and delays the necessary cessation of peat extraction use and development of sustainable alternatives.

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

Teagasc, Bord na Mona, Bord Bia, and the commercial horticulture, garden centre and retail sector in Ireland have had ample opportunities to promote to consumer awareness⁴ over the last decade and have failed. The onus is now on the horticultural and gardening centre industry to make peat free retail products available to the consumer.

⁴ <https://www.irishtimes.com/life-and-style/gardeners-give-up-buying-peat-compost-it-s-a-disaster-for-the-environment-1.4066072>