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**RE: A Review of the Use of Peat in the Horticultural Industry - Key Issues Consultation Paper - Public Consultation Submission**

To whom it concerns,

Please find following my submission in response to a selection of the Public Consultation Questions and other matters raised within the Key Issues Consultation Paper.

*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?*

I believe that any reductions in the harvesting of peat in Ireland should be only be considered within a co-ordinated framework across the countries of the European Union and its neighbours in order to mitigate the potential for adverse economic impact in Ireland. The harvesting of peat for horticulture is an economic activity undertaken in several EU countries at present and any regime that seeks to impose sanctions on the export of peat in Ireland will undoubtedly lead to the transfer of that activity to those other countries with lesser regulations in order to meet latent market demand. Irish people should not be forced out of their jobs by regulation only for that employment to be transferred to other EU countries (where employment rights and rates may not be as favourable as 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, the approach to a reduction in peat harvesting should be centred on reducing demand via lower peat content products and the development of reliable and affordable non-peat alternatives. A proposed focus on restricting supply via enforced cessation of harvesting on existing commercial peatlands will lead to a high negative economic impact in the form of job losses and the increase of imports of peat from other countries – shifting the underlying environmental concerns/issues to those countries at the expense of the Irish economy (and ultimately the EU climate / environment).

While the information to date shows merit in the strategy of not using peat, the phasing out of its use should be done more gradually and on the basis of research that has reached a definite

conclusion. The economic cost of not doing this could outweigh the benefits. Change should happen in tandem with the final results of research. A working group to look into all aspects of the issues raised is a good idea as long as the economic and social concerns are given the same status as environmental ones, and the resultant strategies are not put in place on an ad hoc basis. A timeline for the implementation of the results should not be set. There will be varying complexities with different issues. Education, research and public awareness will probably be a driving force with the timeline.

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

- Irish professional and amateur horticultural users of peat
- The Irish mushroom industry
- IFA
- Representatives of other EU countries with commercial peat harvesting areas
- Independent Irish commercial peat harvesters
- Bord na Mona

*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)?*

A range of measures should be considered that would compensate those involved in harvesting peat for horticulture if this activity was forced to cease. These could initially involve the loss of income to producers and employees with a phased transition over time to payment related to the value of the positive environmental impact from the cessation of the activity.

It is now the case that most producers require a licence issued by the EPA under IPC licencing. As referred to in the paper the only current holder of such a licence is Bord na Mona. The sudden imposition of the licencing requirement on smaller producers in 2019 has resulted in a significant and sudden loss of income from not being able to harvest peat and is creating a serious financial burden particularly on small producers. At minimum there should be consideration given to introducing licence requirements for peat harvesting on a phased basis and with grant assistance for the development of the licence application. In addition, in the interests of transparency, and to ensure that the market remains competitive, it would be useful for other producers to understand the basis on which the Bord na Mona licence was granted. To ensure that no anti-competitive behaviour occurs, the successful application of Bord na Mona must be made available for others to view.

One of the required elements of the licencing application is a restoration plan, the cost of which could be prohibitive to small and medium producers given the low margin economics of the business. A compensation plan should include provision for support to producers to implement the approved restoration plan agreed under any harvesting licence.

*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?*

Answers have not been found in substituting peat in the horticulture industry. I was drawn to Page 10 of the paper says that 'peat moss doesn't compact, so can last for years in soils, providing good aeration and water holding'. In research on the wetting and rewetting of peat, have the carbon capture properties of soil with a peat additive been looked at versus soil that hasn't a peat additive?

I believe that only larger scale producers, such as Bord na Mona, and agricultural researchers will have the financial resources and organisational capabilities required to develop alternative materials to replace peat. For many smaller and medium businesses involved in the industry, peat harvesting is their core competence, and few will possess the resources or ability to succeed in alternative activities.

*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?*

In my opinion the decline in the use of peat should be led by demand-side (rather than supply-side) initiatives involving the development of credible and proven lower-peat content alternatives.

Whereas from what I see in the consultation paper much research has gone into the environmental impact of ceasing peat harvesting, the same cannot be said for the challenge to the economy of the sudden cessation of harvesting. Many bogs have been worked for many years. In dealing with on-going harvesting and peat production a distinction should be made between damaged and undamaged bogs. While SAC's and NHA's are being protected, does the economic value of production on damaged bogs outweigh other factors?

#### *Other Comments*

I note from the consultation paper frequent references to the potential beneficial environmental impacts of ceasing peat harvesting and utilising the peatlands as carbon repositories. However, the potential effects on adjacent landholdings of rewetting peatlands, blocking drains etc. should also be investigated, because if peat production is stopped and the peatland is not maintained the likelihood is that the surrounding arable land will be flooded with a resulting loss in economic output, not only for peat producers but land owners of otherwise arable land.

Yours faithfully,

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