

The Institute of Archaeologists of Ireland welcomes the opportunity to comment on the Review of the Use of Peat in the Horticultural Industry. We appreciate that the research paper relates more to the use of peat rather than the production of it, but we would like to express our considerable disquiet at the meagre consideration given to the impact of peat moss production on the country's extremely rich archaeological heritage. Ireland's peatland archaeology has been the subject of archaeological fieldwork and research for many decades, and is regarded nationally and internationally as some of the most important wetland archaeology in the world.

Section 7 (d) briefly mentions the impact of peat extraction on the preservation of archaeological artefacts. The impact is far greater than on archaeological artefacts alone, as entire archaeological sites can be destroyed by this industry. This includes the direct physical impact of milling machines, as well as the changes to anaerobic water-logged conditions which facilitate the preservation of archaeological sites and artefacts. Indeed, this has been known to happen without archaeological oversight. These are finite cultural resources and the preferred approach is always to facilitate preservation *in situ* for archaeological sites, which would require a cessation of peat production and drainage operations, or significant mitigation measures to maintain the water-logged conditions.

The impact of industrial peat extraction on Ireland's archaeological heritage has been recorded in some detail as it relates to the activities of Bord na Móna, and this has been the subject of two important reviews:

- Review of Archaeological Survey & Mitigation Policy relating to Bord na Móna Peatlands: <https://www.archaeology.ie/sites/default/files/media/pdf/bnm-peatland-review-final-report-20-06-2013.pdf>
- Supplement to The Review of Policy Relating to Bord na Mona Peatlands Since 1990 (June 2013): <https://www.archaeology.ie/sites/default/files/media/pdf/bnm-review-supplement-20-06-2013.pdf>
- Coles, J. 2001. An Evaluation of Current Peatland Survey and Excavation Strategy. Unpublished technical report for the National Monuments Section of the Department of the Environment, Heritage and Local Government and Bord na Móna.

The vast number of archaeological sites and artefacts recorded in Bord na Móna peatlands would undoubtedly have been replicated in private bogs undergoing industrial-scale peat extraction for horticultural purposes had they been the subject of similar systematic archaeological survey and excavation. For instance, The Book of Psalms known as the Faddan More Psalter, which dates from approximately AD 800, was discovered in 2006 in a privately-owned bog in Tipperary used for the production of horticultural peat. It is now the subject of a major exhibition at the National Museum of Ireland: [https://www.museum.ie/Archaeology/Exhibitions/Current-Exhibitions/The-Treasury/Gallery-1-Iron-Age-to-12th-Century/Gallery-2-The-Faddan-More-Psalter-\(1\)](https://www.museum.ie/Archaeology/Exhibitions/Current-Exhibitions/The-Treasury/Gallery-1-Iron-Age-to-12th-Century/Gallery-2-The-Faddan-More-Psalter-(1)). Alas, very few privately-owned bogs have been investigated with regard to their archaeological potential or impact.

We would welcome a more detailed discussion of the disadvantages of the use of peat moss in horticulture, as it relates to Ireland's wetland archaeological heritage, and hope that the result of the review will lead to the end of this practice.