



An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreacht  
Department of Housing,  
Local Government and Heritage

# **Public consultation submissions received re. the National Peatlands Strategy Mid-Term Review**

Prepared by the Department of Housing, Local Government and Heritage

[gov.ie/housing](https://gov.ie/housing)

## **Summary of Public Consultations**

The public consultation on the draft National Peatlands Strategy took place between April 2021 and June 2021. The notification of the public consultation was advertised in the Irish Times, Seachtain, the Irish Farmers Journal and various regional and local newspapers. The document was available in both the Irish and English languages. It was available at <https://www.gov.ie/en/press-release/2b942-public-consultation-on-the-national-peatlands-strategy-mid-term-review/>.

43 submissions received during the consultation timeframe. These were from a wide variety of stakeholders in the peatlands sector, including individuals, community groups, professional associations, groups representing young people, farmers, NGOs, and local authorities. A majority of the individual submissions were from the Midlands, with many submissions being received from national organisations also.

The vast majority of submissions welcomed the mid-term review in general, and considered it a positive move in the development of the National Peatlands Strategy.

A great interest in, and concern for, climate change and biodiversity was evident throughout all submissions received. The value of peatlands for carbon sequestration was repeatedly stressed.

Other concerns regarding such matters as employment, economics, tourism, continued turf cutting traditions and loss of access to fuel/energy supplies, and planning requirements for turf cutting were also raised in the submissions.

Dear sir/madam,

We would like to lend our support to the rewilding of peatlands to support biodiversity and, in particular, the proposed National Peatlands Park in County Kildare.

National Parks act as vital nature reserves but a large scale National Park on peatlands also allows for large scale carbon storage. The importance of this function in the fight against climate change cannot be underestimated or willfully ignored. It's imperative that this Strategy recognises the clean slate proposal for the area as, once destroyed for any other use, no matter how seemingly noble in the short term, the long term biodiversity opportunities and advantages of a national park cannot be regained.

As just one of a huge number of Scout Groups in midland counties and beyond, who cater for young people from 6 to 26, we are extremely limited in creating challenging physical activities in the natural environment due to lack of large scale amenities in proximity. Currently, every hike challenge incurs extra costs to parents (bus hire), extra time commitment from volunteers (distance travelled/overnights) and severely limits the actual time we can allocate to the activity. A lot of the time we have to include a camping aspect to ensure full use of the day but spending 2 nights away from home has a big impact on leader availability and often limits us to one big hike challenge per annum because we need numbers and adult ratios to justify bus hire. Our experience is that our youth members want much more than that. It should be noted that camping is a hugely important but separate scout activity, which may include some element of hiking, however, being forced to include a decent hiking challenge (15+Kms) is not ideal. They are inherently different activities with different physical

challenges and allow us to teach and practice completely different skills. It should also be noted that in a post- or living with-Covid world, the face of camping will probably be changed forever and may even be banned without a huge increase in single occupancy tents. Scout groups are charities who are unlikely to afford supplementary equipment purchases so our focus will switch to other outdoor activities such as hiking but, again, proximity is a massive issue.

There is genuine excitement that a large scale National Park would be located in the oft forgotten Midlands that would allow carpooling and ad hoc access so we could organise multiple long and short hikes for children of all ages throughout the year. We would also be both delighted and privileged to have the opportunity to focus the young minds in our care on the impacts of seasons and seasonal weather on nature and bring the impacts of climate change to them in a very visual, physical, practical and educational way so that they might be the climate champions of the future. Given the development of the Blue Way it is incredible to think of the other amenities that will flourish in the Midlands eg, bike hire, kayaking etc that scouts and other groups, schools, families and tourists can avail of, nevermind the economic and employment opportunities for the area.

We would urge you to give a positive response to this proposal. Its establishment will be a legacy to Ireland's response and commitment to both the climate crisis and the lived experience of citizens.

Yours in Scouting,

[REDACTED]

25th Kildare Kildangan Scout Group

[REDACTED]

County Kildare

Hi,

I would like to state my support for the establishment of a National Peatlands Park in the Midlands as proposed by the National Peatlands Park Working Group. This working group is made up of six non-governmental organisations, namely Birdwatch Ireland, the Kildare Bat Group, Wild Kildare, Butterfly Conservation Ireland, Lullymore Heritage and Discovery Park, the Irish Peatland Conservation Council and Umeras Peatlands Park.

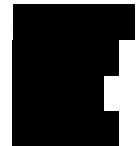
This park as proposed would not only be a wonderful amenity it would positively impact water quality and retention, biodiversity and employment in the Midlands and would make a significant contribution to meeting our reduced national carbon emission targets.

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.

National Peatlands Strategy Mid-Term Review,

Peatland Issues and Land Designation Section,  
National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
Dublin 7 D07 N7 CV



28-06-2021

Dear Sirs,

Thank you for affording me the opportunity to comment on the Mid-Term Review document of the National Peatlands Strategy, based on the current timeframe of the strategy and review document, a number of items are to progress to finalisation in quarter 4 of 2021, therefore it would be prudent to communicate updates to the system in quarter 2 of 2022. This is fortunate and timely considering the recently negotiated CAP agreement for 2023-2026 and the negligible impact that GAEC 2 will have on this Strategy if the agreement is approved. With a 25% CAP budget assigned to “eco-schemes” peatlands will have a very significant role to play environmentally, sustainably and economically.

I am a turbary owner and cut turf on the Nure/Rathnamuddagh Bog in county Westmeath. As a new member of the local community I have experienced the huge social, economic and environmental importance of the “bog”.

The social element of meeting fellow neighbours, organising turf rearing, cutting and arranging transportation, over the last two summers where social isolation for people living alone was of major concern, the social value of the bog is unquantifiable, the wellbeing of others was the cornerstone of most conservations in the bog during this time.

The economic independence of fuel supply cannot be taken for granted, this keeps money in the local community and reduces our dependence on international markets for energy sources such as oil, wood pellets and imported electricity.

From my observations a large quantity of flora and fauna co-exist with human interaction. Frog life is particularly prevalent during this stage of the year.

The access route through the bog also forms part of the “Westmeath Way” and is maintained to a high level by the turf cutters.

With particular reference to the Mid-Term Review document page 7 section M, further public consultation will be necessary to ensure that fair, equitable and transparent protocols are in place to

encapsulate the very context specific local arrangements in place. The public input in this framework should focus on environmental protection procedures, to include natural habitat conservation in harmony with best practice peat extraction methodologies. Should peat extraction no longer be deemed viable a complete and comprehensive financial compensation schedule should be negotiated with all stakeholders that ensures sufficient energy supplies to turf cutters.

Kind regards,

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Dear Sir or Madam,

On behalf of Ballymore Eustace Tidy Towns group I should be grateful if you would support the recent proposal by six prominent Kildare NGOs to create a Kildare National Peatlands Park. This would be the first ever National Park in the Midlands; Ireland has one on the East Coast, five on the West Coast and none in the Midlands.

This is a huge opportunity for Kildare, something that would be great for employment, Biodiversity, Climate Action, and Just Transition.

Kind regards,

A solid black rectangular box used to redact the signature of the sender.

Ballymore Eustace Tidy Towns



Hi there,

I would very much support the idea of a National Peatlands Park in the midlands.

Centred on Kildare and potentially Laois and Offaly, I believe it would have multiple benefits across employment and tourism, as well as biodiversity and climate action.

Thanks and regards,

A solid black rectangular box used to redact a signature.

## Submission on the mid-term review of the National Peatlands Strategy

June 2021

This submission on the mid-term review of the National Peatlands Strategy (NPS) is made by a group of professional archaeologists who have worked for many years in Irish bogs.

[REDACTED]

This submission is made in a personal capacity and we request that it is treated confidentially.

### VISION STATEMENT

The vision statement of the NPS fails to fully recognise pressing problems concerning the protection of cultural and archaeological heritage of peatlands.

The 2011 *Review of Archaeological Survey and Mitigation Policy relating to Bord na Móna Peatlands* (van der Noort et al. 2013) identified 4,358 archaeological monuments, artefacts, and human burials (bog bodies) in Bord na Móna (BNM) peatlands alone, with several hundred additional sites and artefacts known from non-BNM peatlands. The long history of monument identification, artefact recovery and human burial recognition clearly shows that all bogs have significant archaeological potential and all bogs can be regarded as important archives of past environments the paleoenvironmental record, including palaeoclimate data being relevant information for peatland restoration and rehabilitation, not least environmental baselines.

Inclusion of cultural heritage is vital when considering approaches to the conservation and preservation of Irish peatlands. Cultural heritage must be afforded the same significance within ecosystem service frameworks, as climate change, forestry, flood control, energy, nature conservation, planning, and agriculture. Not only is it an invaluable resource in understanding our past but also plays a role in the future national capital accounting of Ireland. Moreover, the Ramsar Convention, to which Ireland is a signatory as part of the EU, relates to the protection and preservation of cultural heritage of wetland environments. A recent United Nations Report

(<https://www.ohchr.org/EN/Issues/CulturalRights/Pages/ClimateChange.aspx>) on Cultural Heritage and climate change also cites the example of the archaeological and

cultural importance of the Irish midland bogs in the context of the threat posed by responses to climate change (Gearey and Everett, 2020).

The 1992 European convention on the Protection of Archaeological Heritage was ratified by Ireland in 1997 and provides the basic framework for policy on the protection of the archaeological heritage. There are several obligations on state bodies within this framework which must be considered with regards to archaeological heritage of bogs. These include facilitating the study of archaeological discoveries by making or bringing up to date maps, surveys and inventories of archaeological sites as well as educating the public in relation to the value of and threat to archaeological heritage. We propose action points below in relation to these important obligations that must be undertaken by the state in order to fully understand and evaluate our peatland cultural heritage.

## VALUES

Value 7 of the NPS states;

*'Peatlands are archaeologically rich landscapes. There is a distinct suite of monument types associated with their usage and a range of activities carried out in bogs reflective of the cultural values of past societies. Organic materials, in wood, leather, skin and tissue, plant and food remains, which survive in peat, do not survive in comparable dryland contexts. Archaeological monuments are preserved within and below peat. Peat itself is a repository for the environmental history of its surroundings. The strategy will facilitate the effective protection of archaeological material in all peatlands.'*

We unequivocally support this statement, however, we have **serious** concerns as to how the effective protection of archaeological material in all peatlands will be achieved. The National Monuments Service is charged with overseeing the protection of archaeological monuments. However, it appears to lack a clear and effective strategy when it comes to the protection of archaeological material situated within peatlands (c.f. van der Noort 2013, 37).

Furthermore under the Planning and Development Regulations 2001, Exempted Development, Class

17 the following developments are exempt from planning regulations;

- (a) Peat extraction in a new or extended area of less than 10 hectares.*
- (b) Peat extraction in a new or extended area of 10 hectares or more, where the drainage of the bogland commenced prior to the coming into force of these Regulations.*

In effect this means that large tracts of bog are subject to peat extraction (by mostly private firms), with no requirement for archaeological survey or excavation. Restrictions on the exemption include;

*(viiA) consist of or comprise the excavation, alteration or demolition of any archaeological monument included in the Record of Monuments and Places, pursuant to section 12 (1) of the National Monuments (Amendment) Act 1994, save that this provision shall not apply to any excavation or any works, pursuant to and in accordance with a consent*

*granted under section 14 or a licence granted under section 26 of the National Monuments Act 1930 (No. 2 of 1930) as amended*

However, in the absence of planning conditions stipulating the need for archaeological survey within these areas of peatland, there are no monuments included in the Record of Monuments and Places. The NPS should seek to support and enforce the application of the National Monuments Acts 1930–2004 and to ensure that developments in peatlands are subject to planning and that previously known monuments are afforded effective protection.

### **MANAGEMENT OF NON-DESIGNATED PEATLANDS TO STOP CARBON LOSS (5.3.4)**

The archaeological heritage of peatlands must always be considered in advance of restoration programmes. Such work should include survey and where required, appropriate mitigation strategies to preserve archaeological sites *in situ* or by record. Archaeological sites already exposed through peat extraction will not necessarily be preserved or protected by rewetting/restoration programmes (Gearey and Fyfe 2016), furthermore studies in Britain's Somerset Levels have demonstrated the challenges of managing *in situ* waterlogged archaeological sites (Brunning 2012). The NPS should stipulate that known and unknown archaeological heritage of peatlands is reviewed and appropriately mitigated in advance of restoration works, or there is the risk of unintended damage or destruction to surviving monuments.

### **NATIONAL MONUMENTS (5.5.11)**

The NPS makes the following statement;

*'The National Monuments Acts also provide for a range of protections in relation to the archaeological heritage. Private owners of peatlands or those who commission or carry out work (including horticultural peat producers) need to be aware of their obligations in terms of works in proximity to monuments included in the Record of Monument and Places under Section 12 of the 1994 National Monuments Amendment Act.'*

As demonstrated above, exemptions in the planning legislation mean that a large number of developments within peatlands simply DO NOT require planning with regard to archaeological heritage. Inclusion of sites in the Record of Monuments and Places is reliant on the commissioning of archaeological work to identify such sites.

The 2011 *Review of Archaeological Survey and Mitigation Policy relating to Bord na Móna Peatlands* found that only 9% of archaeological sites within state owned peatlands had been subject to archaeological mitigation (c.f. van der Noort 2013, 81), and in general the level of resolution was very low (i.e. the proportion of a known monument that was investigated scientifically (ibid., 40–1). Reassessment surveys of several Bord na Móna bog groups identified known concentrations of sites which had been fully destroyed or reduced through milling (ibid., 79–80), demonstrating the failure of the legislation to protect known archaeological sites.

As such the National Monuments Acts have effectively failed to either protect peatland cultural heritage *in situ*, or to adequately preserve by record those sites and deposits now destroyed by peat extraction. The NPS should seek to consider the implications of this situation in terms of the future of any archaeological material that currently survives in Irish peatlands and include our proposed actions in the revised National Peatland Strategy (see below).

## RECOMMENDATIONS

We draw attention to the fact that there are NO actions regarding protection and mitigation for cultural and archaeological material within peatlands. This is in contradiction to the Built and Archaeological Heritage: Climate Change Sectoral Adaptation Plan outlined by the DAHG (2019) which identified the ‘*synergie*’ between the ‘*enhancement and restoration of natural systems*’ and the ‘*cultural significance of landscapes which are rich repositories for buried archaeology and environmental data*’, with direct reference to peatlands. Given the wholesale destruction of Ireland’s peatland archaeological heritage, we urge the following actions be included in the National Peatland Strategy:

- A. The NPS should require the DAHG to gather all known data on previous survey and excavation work in peatlands. This data will inform best policy on the conservation of peatland cultural heritage which should be preserved and protected under the National Monuments Act. It is only when a full resource assessment is carried out, that the potential for future research, community engagement, education, tourism etc can be realised.
- B. The NPS should stipulate the need for archaeological survey in all peatlands subject to development ranging from peat extraction to restoration works.
- C. The NPS should commission a review of the effectiveness on archaeological heritage of peatland restoration, rewetting and conservation measures.

This revision of the NPS will increase the effectiveness of the strategy in achieving its ultimate goals, improve coordination and communication between stakeholders, both public and private and set out clear actions to be prioritised and undertaken over the next five years. The above actions are intended as a pragmatic and practical approach to inform and thus focus on what is achievable, what should be prioritised, and what can be measured and reported on effectively.

## REFERENCES

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<http://www.irishstatutebook.ie/eli/2001/si/600/made/en/print#sched2>

Dear Sir/Madam,

I would like to make an observation on the Turf Cutting Compensation scheme. We live near Gortachalla bog (SAC) in Moycullen, Co Galway. We have lived here since 1998 and back then only one family cut turf on the bog. The rest was unspoiled or recovering habitat. I have over the years seen and reported curlew and kestrel (in the trees bounding the bog) which is an indication of the value of the habitat should anyone doubt it. In the last decade or so and particularly since the turf cutting compensation scheme came into being there has been a huge increase in mechanical extraction from this SAC. It seems often to be people who have somehow acquired the rights to do this. What is interesting is that having cut the turf some don't even bother to bring it home. I may be wrong but it seems to me that these individuals have their eyes on the compensation scheme rather than the preservation of any tradition or right. This increase in extraction has led to a commensurate increase in the destruction of habitat. I despair that similar practices are happening in other important areas.

Yours sincerely,

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National Peatlands Strategy Mid-Term Review  
Peatland Issues and Land Designation Section  
National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
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NPSreview@housing.gov.ie

### **Re: National Peatlands Strategy Mid-Term Review 2021**

A Cara, Creative Rathangan Meitheal welcomes the opportunity to contribute to the Mid-Term Review of the National Peatlands Strategy, and below is a short instruction to our work plus our observations regarding the Mid-Term Review.

Regards

[Redacted]

Joint Coordinator Creative Rathangan Meitheal

[Redacted]

[Redacted]

### **Background – Creative Rathangan Meitheal.**

Creative Rathangan Meitheal brings together a number of groups/individuals with varied interests - local history, community arts and environmental concerns. It runs an annual programme of arts/environmental workshops for pupils in local schools as well as seminars with an historic or environmental focus. These activities are developed and delivered in collaboration with local and national experts. To this end Creative Rathangan Meitheal has joined the Community Wetlands Forum, the Irish Peatlands Conservation Council, built relationships with Bord na Mona and in particular its Ecology Team, and with the History and Geography Departments in Maynooth University.

A Creative Rathangan Meitheal Seminar in 2018 - *'Walking Off A Paper Landscape'* - led to the convening of an ad hoc group with representatives from Allenwood, Timahoe, Rathangan, Lullymore and Edenderry. The aim of this group is to explore the potential of using BNM railway tracks as greenways through parts of Kildare linking the Royal, Grand and Barrow Canals in Kildare, and to BNM/ESB communities in Offaly and Laois. Additional work by this ad hoc group include visits



to the Lullymore Wetlands, exploratory walks along existing BNM railway tracks, and a series of informal meeting with Bord na Mona. Later this year as part of an event to mark European Rail Heritage Year 2021, Creative Rathangan Meitheal will host an event – ‘*After Tracks*’ which will explore the development of BNMs Industrial Rail Network, present a series of films/maps of the permanent railway tracks, and discuss possibilities for its future use.

Creative Rathangan Meitheal Seminar ‘*Imagining A Landscape*’ in 2019 and the *Layers Series* in 2020 – with the involvement of Bord na Mona’s Ecology Team and Staff from Maynooth University – focused on the future shape/nature of this evolving landscape, and drew audiences from across Kildare and across the Midlands

From Rathangan to Lullymore, to Allenwood, to Coill Dubh, to Prosperous to Timahoe, and across the Midlands, this evolving landscape raises questions in terms of jobs lost and how they will be replaced. It also raises questions as to how raised bog remnants will be protected, what this will mean for biodiversity, what this new landscape might look like, and its tourism/recreational potential.

## **Creative Rathangan Meitheal’s Response to the National Peatlands Strategy Mid-Term Review 2021**

### **Context**

The closure of the ESB power stations at Shannonbridge and Lanesboro marked the end of a seventy-year partnership with Bord na Mona. It also accelerated the pace of Bord na Mona’s move away from peat extraction, and it now relies on existing stockpiles to fuel its operation at Powergen Edenderry. The appointment of a Just Transition Commissioner, proposals from the Joint Committee on Climate Action that the State “rewets” some 270,000ha of the country’s industrial peatlands by 2030, and moves to “rewet” a number of BNM owned bogs under the Peatlands Climate Action Scheme (PCAS) point to the reality that without targeted action to generate employment large swathes of the Midlands are at risk of economic harm, and, that large parts of the landscape across the midlands are going to change dramatically.

### **National Peatlands Park**

Bord na Mona has stated that its bogs at Ummeras, Ballydermot, Lodge, Ticknevin, Timahoe North and Timahoe South will be included for rehabilitation work under the Peatlands Climate Action Scheme. While Creative Rathangan Meitheal welcomes PCAS it is concerned that no long-term vision for the areas rewetted under PCAS has been articulated. It would appear that a number of disconnected wetlands will be created but their long-term viability is in doubt.

Creative Rathangan Meitheal supports the establishment of a National Peatlands Park in the West Kildare /East Offaly area, noting that the existing BNM railway

/network forms a greenway capable of linking these new wetlands to the Royal, Grand and Barrow Canals in Kildare and across the midlands to the Shannon.

## **Planning, Turf Cutting and Enforcement**

While Bord na Mona has ceased its peat harvesting activities turf-cutting on BNM lands continues with an estimated 1,600 individuals retaining turbary rights on BNM lands, an estimated 300 people with licences to cut turf on BNM lands and some 20 private contractors licenced to cut turf<sup>1</sup>. Turf is being cut on privately owned bogs, and on protected bogs with, it appears, no risk of prosecution. Peatmoss production which is currently planning exempt make a nonsense of any ambition to retain ecologically functioning peatland areas.

Creative Rathangan Meitheal recommends that National Peatlands Strategy takes a coherent approach to the issues of planning requiring all peat extraction activities to be licenced, illegal/unauthorised harvesting to be sanctioned, and steps taken to buy-out turbary rights. The issue of enforcement/legal action is most likely the responsibility of the NPWS and it may be more pro-active following the current NPWS review.

At a county level the implementation of the Peatland Strategy could be complimented by a requirement that all Local Authorities carry out an audit of all peatlands in their areas establishing ownership, state of the peatland, current use/state and future use/rehabilitation plans.

## **Renewable energy and Peatlands.**

The exiting planning regulations in relation to windfarms take no account of the unique Bog of Allen landscapes – big sky country with wide and distant horizons and little or no sign of man-made structures. These views are a rarity and are probably unique to the Midland bogs. Wind turbines and their associated infrastructure would severely impact on tourism and the visual integrity of these landscapes.

Creative Rathangan meitheal recommends the logic for the construction of windfarms on peatlands be revisited and include a detailed review of existing plans for major wind turbine developments on peatlands.

## **Tourism**

The Covid-19 pandemic led to an increase in the number of people walking on BNM lands – along old railway lines and gravelled service roads. The potential for peatlands based tourism needs to be recognised and included the Peatlands Strategy given the industry's potential to transform perceptions and attitudes towards bogs. Encouraging local communities and other stakeholders to protect peatlands for themselves for generations to come. The creation of a 'wilderness' near Dublin –

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<sup>1</sup> Farming Independent April 12<sup>th</sup> 2021

accessible via the Royal, Grand and Barrow Cycle/Walkways - offers an escape from our main urban centres opportunities to connect with nature..

However, there is a need to ensure that sensitive areas are protected, by ensuring that tourist/recreational needs do not take precedence over the protection of vulnerable sites and that easy access to such sites is not facilitated. In any event there is a need to revisit Actions Closed No. 30 – and reconsider the amenity value/use of peatlands..

### **Education, Experience and Values.**

Over the past five years or so, Creative Rathangan Meitheal has taken groups of people on walking/drawing/exploration walks along BNM railway lines with ecologists, artists and historians introducing them to the multiple layers that make up this layered landscape. While a focus on educating people as to the value of peatlands is important, our experience is that people need to experience peatlands to truly understand them.

### **Coherence across strategies and policy areas**

Creative Rathangan Meitheal is aware that the National Peatlands Strategy Mid-Term Review is just one of a number of reviews taking place at the moment. However, climate change adaption and the prevention of further bio diversity loss requires consistency across policy domains and departments. It also requires action at a pace and intensity we are unaccustomed to.

I have read your interim report and find no mention of Waterways Ireland in your report. This is very confusing as Waterways Ireland have vast stretches of Peatlands in their estate portfolio, which they are selling and leasing to commercial turf cutters and peat harvesters.

Here in my village in Pullough Co Offaly we have first hand evidence of this everyday it is to say the least quite perplexing that a time when Bord na Mona are trying to re-flood the industrialised bogs that Waterways Ireland are overseeing the destruction of vast tracts of virgin bog in Offaly.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

Co Offaly

A chara

Please find enclosed my submission to your consultation on peatlands and I wish you well with your deliberations

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

Submission

When Bord na Mona was established in 1946 to manage the bogs, the company's first chief executive, Todd Andrews, saw our boglands as "something to be got rid of, to be turned into productive land"[i].

We know better now, and among other factors, our peatlands are a haven for biodiversity, a carbon storage system and a place of rest and renewal for people living in urban habitats.

The peatlands strategy must be aligned with the Just Transition Fund to support communities who would have relied on an income from our peatlands. In addition, links must be made between our biodiverse peatlands and our developing blue/green tourism infrastructure.

Finally, a major educational programme must be initiated to inform people of the wealth of biodiversity, folklore and tradition associated with our bogs

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[i][i] <https://www.irishtimes.com/news/environment/for-peat-s-sake-rethinking-the-bog-1.4154970?mode=sample&auth-failed=1&pw-origin=https%3A%2F%2Fwww.irishtimes.com%2Fnews%2Fenvironment%2Ffor-peat-s-sake-rethinking-the-bog-1.4154970>

I submit my support for a new 7,000-hectare National Peatlands Park in Kildare and Offaly.

I submit that all outcomes should be consistent with the Climate Action Bill and the biodiversity targets set by the Government for CO2 emissions.

I submit that the practice of commercial monoculture of Sitka spruce, Douglas Fir and similar be banned in Ireland and especially on Peatlands.

I submit that mixed planting of appropriate species of "native" trees on the bog be promoted to encourage the sequestration of CO2.

I submit that current and future draining of peatlands and adjacent land be prohibited.

- Proposed Bog of Allen project offers potential for job creation, eco-tourism, and opportunities in research, science, conservation, and archaeology.
- The core aims of the group are to reverse biodiversity loss, save valuable peatland habitats, create landscape-scale parklands and empower local peatland communities.
- Irish Peatland Conservation Council, Lullymore Heritage and Discovery Park, Umeras Peatlands Park, Wild Kildare, Kildare Bat Group, Butterfly Conservation Ireland, and Birdwatch Ireland are advancing the initiative.

Seven local and national environmental organisations this week presented their proposal for a major new 7,000-hectare National Peatlands Park in Kildare and Offaly, at a meeting with Bord na Móna. The Group presented their proposal to Government and to the Strategic Policy Committees in Kildare County Council. The proposals have received endorsement by the Committees and have been identified for attention in the proposed new County Development Plan for Kildare.

Ireland is currently in a climate and biodiversity emergency.

- Peatlands are the largest store of terrestrial carbon in the world.
- Globally only 3% of the world's landmass is peatlands. In Ireland, it is 20%.
- Peatlands store over three times as much carbon as rain forests.
- We also know that the world's peatlands, while only covering 3% of the Earth's landmass, contain twice the sequestered carbon of all the world's forests combined.
- In Ireland 75% of our terrestrial carbon is stored in peatlands.

Jesmond Harding, spokesperson for the Peatlands National Park Group said:

“What we have in Ireland is unique and is the envy of the scientific world. The cessation of peat extraction in Ireland presents a once-in-a-lifetime opportunity to save and preserve what we can and to create new wetland and heathland habitats across our central plains. The restoration and rehabilitation of this landscape will support Ireland's work towards our net-zero emissions by 2050. It will create space for the biodiversity, amenity space for people and eco-tourism potential.”

The Irish Peatlands Conservation Council, Lullymore Heritage and Discovery Park, Umeras Peatlands Park, Wild Kildare, Kildare Bat Group, Butterfly Conservation Ireland, and Birdwatch Ireland have come together to drive a proposal for a new National Peatlands Park on a landscape scale in the Bog of Allen centred in County Kildare. The proposed study area is over 7,000 hectares. The objective is to rewild and restore the cutaway peatlands following the cessation of industrial-scale peat extraction, creating a National Park similar in ambition to world-famous parks such as The Peak District, The Lake District, and the Broads National Park in the UK. These national parks generate billions in revenue for the UK economy and create tens of thousands of jobs in their vicinity.

The National Peatlands Park Group says this initiative will benefit communities, the environment, and the economy. The Group is particularly concerned about the animal populations under pressure in our local area. The Curlew is a species that has seen a 98% decline in population since the 1980's. One of Europe's legally protected butterflies, the Marsh Fritillary, and the iconic raised bog specialist, the Large Heath Butterfly, are facing extinction in many areas.

Jesmond Harding added: "The Bog of Allen is unique in terms of scale and holds the potential for a true wilderness experience. The variety, beauty and number of species in this area is unique in Ireland and not only should it be protected, but it should also be available for us all to experience and enjoy. The designation of National Park Status for this Peatlands region will deliver multiple benefits. It will protect and greatly increase biodiversity, mitigate climate change, enhance the social and economic life of midland communities and act as a catalyst for a growing sustainable tourism industry."

The proposed National Peatlands Park would be located on Bord Na Mona cutaway bogs in Kildare and Offaly and would complement the great work in rehabilitation that Bord na Móna are currently engaged in under their Peatlands Climate Action Strategy.

In writing this submission I acknowledge resources provided by the Peatlands National Park Group.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sir/Madam

This is [REDACTED], representative for Community and Voluntary groups on the Climate Action Strategic Policy Committee. Myself and [REDACTED], representative for Environmental groups on the Climate Action Strategic Policy Committee, [REDACTED] Chairperson of the Secretariat, [REDACTED], Facilitator for the 60+ strong Climate Action Linkage Group and the 60+ members of the Climate Action Linkage Group wish to make a submission to the NPS review calling on you to endorse the excellent, exciting proposal that has been put together by 7 prominent NGOs in Kildare for a Kildare National Peatlands Park. We fully support this excellent proposal for its carbon sequestration, biodiversity enhancement, tourist and local residents amenity provision, economic opportunity for depressed towns, employment opportunity and Just Transition capacity.

We believe this proposal has captured the hearts and minds of community, voluntary and environmental groups all over Kildare and its widespread endorsement is an indicator of the growing appetite for ambitious climate and biodiversity action in our county.

We hope that your review will support our ambition and vision for Kildare and that you show strong allyship with community groups that are engaged, activated and growing.

Could you please share your vision for Kildare peatlands with us and provide assurance that our vision is reflected in your review?

Many thanks

[REDACTED]



Dear Mr.Noonan

This review is an important step for the future. I would like to make a brief statement in relation to the strategy.

It is important, as you say, to take into account the various bills that have come into force since the National Peatland Strategy was published. In particular the various bills that relate to biodiversity & conservation. We have lost so much in the way of species in the last number of decades, & we are in danger of losing more, if we do not act to protect our bogs,& the environs.

Continuous monitoring of the various projects is crucial,& good,& effective communications with private landowners is very important.

It is vital that all relevant organisations are working together on this, & that the end goal. is one that benefits the whole population,& protects our environment for future generations.

I hope that the goals that are set out, will be ones that we can be proud of in the future.

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.

To whom it may concern,

I would like to see the Peatland Strategy incorporate a recent proposal submitted to create a Peatlands National Park in Kildare.

This suggestion creates a platform to meet a number of the ecological and educational objectives of the plan and strongly signals the value placed on our Peatlands.

Kind regards

A solid black rectangular box used to redact the signature of the sender.

30/6/2021

Dear Minister Noonan

Kilcock Tidy Towns and Kilcock 4 Climate Action who work closely together would like to make a submission to the National Peatlands Strategy Mid-Term Review.

1. We believe the National Peatlands Strategy should reflect the Climate emergency and biodiversity extinction and the importance of peatlands for both.
2. The strategy should be: as much of our peatlands as possible to be used as a carbon sink, to be rewetted and rewilded.
3. Our peatlands are so valuable in the struggle against climate breakdown, it has been said that 1 acre of bog is the equivalent of 10 acres of mature forest in terms of carbon storage. We would therefore recommend that where forestry on peatlands in the midlands is harvested for timber that we re-wet these areas and re-wild them for carbon storage, biodiversity and tourism.
4. We believe using our peatlands for windfarms or other renewable energy is missing an enormous opportunity and a very poor use of an amazing resource. We advocate for renewable energy solutions but believe there are now far better solutions such as off-shore or in other non-peatland areas to provide the much needed renewable energy.
5. We would recommend a public education programme on the importance of peatlands and their many benefits (carbon sink, flooding mitigation, biodiversity recovery) etc. and potential for creating a haven for people and biodiversity while also creating an economic tourism benefit.
6. The strategy should take a 'whole of Ireland' approach that is underpinned by an overriding goal to act in accordance with what is best for climate action and biodiversity recovery and should include all peatlands: decommissioned industrial peatlands, private peatlands (intact and cutaway), forestry on peatlands and peat soils on farms.
7. There is a huge opportunity for a National Peatlands Park in the midlands, including our own County Kildare, this would contribute significantly to carbon storage, biodiversity and provide an amenity to help with a just transition for the midlands region.
8. We believe that the concept of, and measures for 'just transition' for the population traditionally reliant on peatlands needs to be made explicit in the strategy.

Lastly we would urge you not to waste this opportunity to make the right decisions for our long term future.

Yours sincerely

A black rectangular box redacting the signature of the sender.

Kilcock Tidy Towns

I live in newbridge, Co kildare and drove to edenderry Co offaly last Sat. I marvelled at the views across the bog driving from Rathangan to Eden derry. I was explaining to my 10 year old the history of footing turf etc as we drove. It occurred to me that it would be a shame if our history of utilising the bog was lost as might easily happen with climate change. And then today I became aware of this public consultation. About peatlands and I feel it would be great in terms of utilising our natural boglands, to create a proper national park. Pollards Town fen was a success in terms of highlighting a special geographic area of interest, and so too should our bogs.

As a country that no longer plays a big role in producing goods to fund our economy, this would be a good source of employment, would be creating a tourist and recreational space and would be helping with changes that need to happen in the future. Kildare /offaly should not just be synonymous with tourist shopping in kildare village or horse racing. Boglands are part of unique kildare culture. It is sad to say that sometimes more interest is shown in finding out about what other planets are made of rather than knowing about what's on our doorstep.

I hope some of the points I have made will help highlight the positive effect a national park in kildare /offaly would have for people and the environment.

Regards

[REDACTED]

National Peatlands Strategy Mid-Term Review  
Peatland Issues and Land Designation Section  
National Parks and Wildlife Service  
Department of Housing, Local Government and Heritage  
90 King Street North  
Smithfield  
Dublin  
D07 N7 CV

29 June 2021

[NPSreview@housing.gov.ie](mailto:NPSreview@housing.gov.ie)

A Chara

Thank you for the opportunity to respond to the consultation on the Mid-term review. This submission is made on behalf of the National Peatlands Park Group<sup>2</sup>. We endorse the submissions made by our constituent group members and wish to make the following additional points;

1. There is an opportunity to make a significant contribution to our 30% target for protected areas<sup>3</sup> at this time. The justification for including the peatlands for protected area status is their demonstrated association and critical importance for species under threat and in decline at national and international level. At the same time, peatlands have the potential to deliver on climate mitigation through carbon capture and sequestration under peatlands carbon accounting. Peatlands cover 20.6% of land area in Ireland. Peatlands represent 75% of our total soil organic carbon stock which represents the largest store of carbon in the Irish landscape.<sup>4</sup> Artificially drained peatlands represent the single largest source of soil carbon losses from land in Ireland and their restoration offers a high level of climate mitigation potential. A half a century of drainage for the extraction of peat has led to widespread degradation of peatland and wetland habitats, with concomitant biodiversity loss and largescale active and passive carbon leakage and emissions.
2. We acknowledge the work already commenced to rehabilitate and restore some of our bogs. Proposals for advanced rehabilitation for fragments of raised bog on lands managed by Bord na Móna are encouraging. However, these isolated “islands” will

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<sup>2</sup> Butterfly Conservation Ireland, Irish Peatland Conservation Council, Kildare Bat Group, Wild Kildare, Umeras Community Development Group and Lullymore Heritage & Discovery Park

<sup>3</sup> - [https://ec.europa.eu/environment/strategy/biodiversity-strategy-2030/eu-nature-restoration-targets\\_en](https://ec.europa.eu/environment/strategy/biodiversity-strategy-2030/eu-nature-restoration-targets_en)

<sup>4</sup> [https://www.epa.ie/pubs/reports/research/land/STRIVE\\_75\\_web\\_SC.pdf](https://www.epa.ie/pubs/reports/research/land/STRIVE_75_web_SC.pdf)

gradually shrink and their populations of some dependent animals will go extinct if their habitats are not connected through a landscape scale plan for linkage, restoration and repurposing of extracted peatlands. There is an opportunity also for Bord na Mona to rebalance their portfolio in substantial favour of nature and nature based solutions for climate mitigation and biodiversity loss.

3. The multiplicity of schemes and initiatives undertaken by the Government and its agencies (EIPs, Life, Just Transition and Agri-Environment schemes), at considerable cost to the taxpayer, needs a unifying coherence and vision for the future of our peatlands and our peatlands heritage. It is our view that the next phase of the peatlands strategy will be enhanced by the linkage to an overall landscape approach delivering scale, ambition and innovation in the creation of new habitats within the peatlands landmass. A central coherent vision through the creation of Ireland's first National Peatlands Park will assist on communicating the new relationship with our peatlands and new opportunities for the economy and communities of the midlands.
4. We believe that the central importance of scale can be delivered by proceeding without delay to establish a National Peatlands Park. The National Peatlands Park group have developed a template and concept map for a Park based in Kildare and Offaly on the former Bog of Allen. This Park can be a blue print for other regional parks and act as a pilot to showcase and demonstrate the potential for biodiversity recovery, climate mitigation, research, education and tourism with audited metrics over the lifetime of the next Strategy.
5. We note the Department's intention to conduct a feasibility study on the creation of a national peatlands/wetlands park to be published in 2021(item s). We would urge the Department to proceed without delay to complete the study. The National Peatlands Park Group stand ready to assist with this study in whatever way we can.

Is mise le meas

[REDACTED]  
National Peatlands Park Group  
[REDACTED]

Submission by [REDACTED], Chairperson No Planet B Club, Naas,

Dear Mr Noonan,

The No planet B club (a Kildare based kids environmental group) would like to support the idea of the 7,000 hectare National Peatlands Park in Kildare and Offaly.

This seems like the very best use of the land for so many reasons, including potential for job creation, eco-tourism, and opportunities in research, science, conservation, and archaeology. Taking into account Ireland is currently in a climate and biodiversity emergency this project would help to reverse biodiversity loss, save valuable peatland habitats, create landscape-scale parklands and empower local peatland communities.

As you know there are many local and national environmental groups supporting this initiative. The kids of the No Planet B club enjoy club trips to Lullybeg and learn about the diverse biodiversity of the area and also learn about the continued and increasing threatened species. Even this group of 10 to 12 year olds understand the importance of protecting and preserving our peatlands and the concept of a huge national park to support this.

Jesmond Harding, spokesperson for the Peatlands National Park Group said:

“What we have in Ireland is unique and is the envy of the scientific world. The cessation of peat extraction in Ireland presents a once-in-a-lifetime opportunity to save and preserve what we can and to create new wetland and heathland habitats across our central plains. The restoration and rehabilitation of this landscape will support Ireland’s work towards our net-zero emissions by 2050. It will create space for the biodiversity, amenity space for people and eco-tourism pot  
The Bog of Allen is unique in terms of scale and holds the potential for a true wilderness experience. The variety, beauty and number of species in this area is unique in Ireland and not only should it be protected, but it should also be available for us all to experience and enjoy. The designation of National Park Status for this Peatlands region will deliver multiple benefits. It will protect and greatly increase biodiversity, mitigate climate change, enhance the social and economic life of midland communities and act as a catalyst for a growing sustainable tourism industry.”

It is difficult to see any disadvantage to this excellent proposal. This truly is a perfect opportunity to prove Ireland takes the climate and biodiversity emergency seriously and are willing to act on it.

kind regards,

[REDACTED]

National Peatlands Strategy Mid-Term Review,  
Peatland Issues and Land Designation Section,  
  
National Parks and Wildlife Service,  
  
Department of Housing, Local Government and Heritage,  
  
90 King Street North,  
  
Smithfield,  
  
Dublin 7 D07 N7 CV



28-06-2021

Dear Sirs,

I make this submission as a turf cutter on the Nure/Rathnamuddagh Bog in county Westmeath and thank you for affording me the opportunity to comment on the Mid-Term Review document of the National Peatlands Strategy. Based on the current timeframe of the strategy and review document, a number of items are to progress to finalisation in quarter 4 of 2021, therefore it would be prudent to communicate updates to the system in quarter 2 of 2022. This is fortunate and timely considering the recently negotiated CAP agreement for 2021-2027 and the negligible impact that GAEC 2 will have on this Strategy if the agreement is approved. With a 25% CAP budget assigned to "eco-schemes" peatlands will have a very significant role to play environmentally, sustainably and economically.

From my observations a large quantity of flora and fauna co-exist with human interaction. Frog life is particularly prevalent during this stage of the year. The access route through the bog also forms part of the "Westmeath Way" and is maintained to a high level by the turf cutters at their own cost and

The economic independence of fuel supply cannot be taken for granted, this keeps money in the local community and reduces our dependence on international markets for energy sources such as oil, wood pellets and imported electricity.

The social element of the bog, meeting fellow neighbours, organising turf rearing, cutting and arranging transportation, over the last two summers where social isolation for people living alone was of major concern, the social value of the bog is unquantifiable, the wellbeing of others was the cornerstone of most conservations in the bog during this time.



With particular reference to the Mid-Term Review document page 7 section M, further public consultation will be necessary to ensure that fair, equitable and transparent protocols are in place to encapsulate the very context specific local arrangements in place. The public input in this framework should focus on environmental protection procedures, to include natural habitat conservation in harmony with best practice peat extraction methodologies. Should peat extraction no longer be deemed viable a complete and comprehensive financial compensation schedule should be negotiated with all stakeholders that ensures sufficient energy supplies to turf cutters.

Kind regards,

[REDACTED]

Minister,

I acknowledge the progress to Date on the strategy. However, given the changed national policy and judicial environment, I submit that the outcomes from the strategy should be consistent with and provides for climate change targets and biodiversity sustainability.

In particular,

1. Forest tree type be restricted to mixed native species. That the purpose of planting be for the sequestering of CO<sub>2</sub>, not for plantation of commercial forest monoculture.
2. Prohibit land uses on peatlands, and/or adjacent to peatlands, that require further drainage of peatland.
3. Immediately Declare a National Park over the peatlands in the midlands.
4. Require an environmental impact report (re P & D Act) for all existing and future land uses on peatlands.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

National Peatlands Strategy Mid-Term Review,  
Peatland Issues and Land Designation Section,  
National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
Dublin 7 D07 N7 CV



28-06-2021

Dear Sirs,

Thank you for affording me the opportunity to comment on the Mid-Term Review document of the National Peatlands Strategy, based on the current timeframe of the strategy and review document, a number of items are to progress to finalisation in quarter 4 of 2021, therefore it would be prudent to communicate updates to the system in quarter 2 of 2022. This is fortunate and timely considering the recently negotiated CAP agreement for 2023-2026 and the negligible impact that GAEC 2 will have on this Strategy if the agreement is approved. With a 25% CAP budget assigned to “eco-schemes” peatlands will have a very significant role to play environmentally, sustainably and economically.

I am a turbary owner and cut turf on the Nure/Rathnamuddagh Bog in county Westmeath. As a new member of the local community I have experienced the huge social, economic and environmental importance of the “bog”.

The social element of meeting fellow neighbours, organising turf rearing, cutting and arranging transportation, over the last two summers where social isolation for people living alone was of major concern, the social value of the bog is unquantifiable, the wellbeing of others was the cornerstone of most conservations in the bog during this time.

The economic independence of fuel supply cannot be taken for granted, this keeps money in the local community and reduces our dependence on international markets for energy sources such as oil, wood pellets and imported electricity.

From my observations a large quantity of flora and fauna co-exist with human interaction. Frog life is particularly prevalent during this stage of the year.

The access route through the bog also forms part of the “Westmeath Way” and is maintained to a high level by the turf cutters.

With particular reference to the Mid-Term Review document page 7 section M, further public consultation will be necessary to ensure that fair, equitable and transparent protocols are in place to encapsulate the very context specific local arrangements in place. The public input in this framework should focus on environmental protection procedures, to include natural habitat conservation in harmony with best practice peat extraction methodologies. Should peat extraction no longer be deemed viable a complete and comprehensive financial compensation schedule should be negotiated with all stakeholders that ensures sufficient energy supplies to turf cutters.

Kind regards,

## Submission on the National Peatlands Strategy Mid-Term Review

[REDACTED]

[REDACTED]

[REDACTED]

Dear Minister Noonan,

### Re: National Peatland Strategy Mid-Term Review

The National Peatlands Strategy aims to provide a long-term framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contribution to the well-being of this and future generations. As stated in the report *“some of these (contributions) are obvious and others are less so. Some are traditionally recognised benefits and others are emerging. Gaining a sense of the true value and potential of our peatlands requires consideration of a wide range of issues including current and possible land uses and the implications of such uses.”*

The original impetus for developing a National Peatlands Strategy was in the context of a national debate on compliance with EU law and fears around the cessation of turfcutting on protected bogs. Since the National Peatlands Strategy was developed the public’s understanding of the value of peatlands has changed dramatically. While the issues around turfcutting are still to the fore the cessation of industrial peat extraction by Bord na Mona and the international campaigns on climate change and the extinction crisis have elevated the wider values that the Irish people put on our bogs. The work of the Community Wetlands Forum and communities all around the country in preserving local bogs has been particularly important.

While the concept of ecosystem services and natural capital accounting has been useful in highlighting the important environmental services provided by peatlands, including flood control, renewable energy, etc. the social contribution of the peatlands to human wellbeing has been undervalued. In addition, the contribution of the regenerating peatlands to our biodiversity crisis need to go beyond compliance with EU laws and towards the contribution peatlands can make to our National Biodiversity Strategy.

We believe that the industrial bogs in the midlands represent a once-in-a-lifetime opportunity to develop major new biodiversity areas which will provide havens for people and biodiversity. In order to grasp this opportunity we need to revise the National Peatlands Strategy and develop a landscape approach to our peatlands which encompasses our protected peatlands, decommissioned industrial peatlands, private peatlands (intact and cutaway), forestry on peatlands and peat soils on farms. The decommissioned Bord na Mona peatlands

can become the high biodiversity bogs of the future and the management of farms adjacent to these bogs can create a mosaic of habitats to support a wide range of species.

I believe that the focus of the National Peatlands Strategy needs to be refocused to align with the government's new policy for a Just Transition for communities in the midlands to balance the economic, social and Environmental benefits of peatlands and meet our commitments under EU 30/30 to achieve 30% protected areas.

There is potential for peatlands to contribute simultaneously to carbon storage, enhanced biodiversity and sustainable economic regeneration. I suggest that the National Peatlands Strategy be aligned with the Just Transition Fund (JTF) objectives to support the midlands communities impacted by the cessation of peat harvesting. This means reserving greater areas of these bogs for community projects. It is critical that some large wilderness areas are created near to Dublin which provide wildlife and people with an opportunity to get away from urban and industrial elements to enjoy peace and tranquillity.

Umeras Community Development is a partner in the FarmPEAT.ie Environmental Innovation Partnership (EIP) which is a results-based agri-environmental programme to pay farmers to enhance biodiversity on their farms. The National Peatlands Strategy needs to promote a landscape approach where former industrial bogs are generated and linked to new habitats on farms.

A consortium of local organisations including Umeras Community Development is proposing a Peatlands National Park on the former industrial bogs of Kildare and East Offaly. The National Peatlands Strategy should take a bold step to allocate large areas of these industrial bogs for carbon storage, biodiversity and amenity to contribute to a just transition for the midlands region. The National peatlands Strategy needs to recognise the increased potential for blue and green infrastructure to link the peatlands to other significant amenity and tourism areas creating an attraction which is important on an international scale, and which will attract increased domestic and international visitors to the area. Examples in Kildare include Umeras Peatlands Park and Lullymore Heritage Park which provide destinations that are being linked to the Barrow Blueway.

The National Peatlands Strategy recognises the important potential for industrial peatlands to host renewable energy and Bord na Mona has developed major wind farms on a number of bogs. EirGrid has put forward a new vision for the development of renewable energy in Ireland with an increased focus on offshore wind which was not feasible when the National Peatlands Strategy was published in 2015. We would recommend a review of Bord na Mona's strategic plan for the peatlands in the East of Ireland, which is predominantly focused on industrial and renewable energy, with the bogs in the West of Ireland focused on biodiversity. We believe that this strategy needs to be revised to provide more of a balanced development of decommissioned bogs in the east of Ireland with more peatland areas allocated purely to carbon storage, biodiversity and tourism/amenity uses. This can be achieved by designating large areas for a Peatlands National Park which will demonstrate a long-term landscape approach our peatlands.

Coillte manages significant areas of forestry on peatlands in the midlands. As the timber is harvested there is an opportunity to re-wet these areas and re-wild them for carbon storage, biodiversity and tourism/amenity linked to similar land uses on decommissioned industrial peatlands.

## National Peatlands Review

Hi, I am a member of Kildare Communities for Climate Action Group and also the recently formed Naas Biodiversity Group. I became involved in climate action towards late 2019, however it was only last year I learned about the importance of peatlands in terms of climate change.

I was absolutely stunned to learn from another member of the group that 1 acre of bog is the equivalent of 10 acres of mature forest in terms of carbon storage. This is absolutely incredible. As we are in a climate crisis and don't have 20 years to wait for newly planted trees to grow and mature, our best weapon against climate change is our bogs!!

Ireland has an amazing secret weapon here not only in terms of carbon storage, but also in terms of flooding. (The bogs acting as a sponge to soak up water and prevent flooding and then release it in terms of drought, how absolutely amazing). The public really need to be educated on the phenomenal role of peatlands in the fight against climate change, and even on the immediate benefits of bogs in that they reduce flooding, therefore having benefits to many homes and businesses.

In addition to these amazing roles, it is hard to believe that our bogs also play another incredible role in protecting biodiversity. So many endangered species have their habitats in the wetlands so by conserving these, we will protect these species, such as birds like the curlew which have suffered a mind-blowing 97% decline in recent years.

Since becoming involved in climate action the subject can be very overwhelming and generally always negative. However learning that a number of NGO's had come together in Kildare to propose a National Peatlands park has filled our climate group with so much hope.

The potential for biodiversity is absolutely enormous, and the natural benefits will be felt for centuries and of course a National Peatlands park would completely revitalize the midlands. There is so much scope for education and outdoor activities in developing this area. There is already huge excitement building in county Kildare about this National Peatlands Park and those of us who are aware of it cannot wait to see this project come to fruition.

## Submission from Umeras Community Development on the National Peatlands Strategy Mid-Term Review

Submitted by [REDACTED]  
[REDACTED]

Umeras Community Development,

Umeras,

Monasterevin,

County Kildare  
[REDACTED]

Dear Minister Noonan,

### Re: National Peatland Strategy Mid-Term Review

This document represents the submission from Umeras Community Development (UCD), a registered community group in County Kildare, to the National Peatlands Strategy Mid-Term Review.

Umeras Community Development (UCD) currently has three projects:

1. UCD has secured over 100,000 euros in funding from the Just Transition Fund and Kildare Leader for Strategic Planning, Design and Biodiversity studies for the development of a new peatlands nature park on a decommissioned Bord na Mona Bog (<https://www.facebook.com/umeraspeatlands>)
2. UCD is a partner in a European Innovation Partnership (EIP) called FarmPEAT (<https://www.farmpeat.ie/>) which seeks to pay farmers for results-based improvements in biodiversity on their farms.
3. UCD is part of a consortium of NGOs and community groups proposing to establish a Peatlands National Park in Kildare/East Offaly.

### Comments on the National Peatlands Strategy Mid-Term Review

The National Peatlands Strategy aims to provide a long-term framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contribution to the well-being of this and future generations. As stated in the report *“some of these (contributions) are obvious and others are less so. Some are traditionally recognised benefits and others are emerging. Gaining a sense of the true value and potential of our peatlands requires consideration of a wide range of issues including current and possible land uses and the implications of such uses.”*



The original impetus for developing a National Peatlands Strategy was in the context of a national debate on compliance with EU law and fears around the cessation of turfcutting on protected bogs. Since the National Peatlands Strategy was developed the public's understanding of the value of peatlands has changed dramatically. While the issues around turfcutting are still to the fore the cessation of industrial peat extraction by Bord na Mona and the international campaigns on climate change and the extinction crisis have elevated the wider values that the Irish people put on our bogs. The work of the Community Wetlands Forum and communities all around the country in preserving local bogs has been particularly important.

While the concept of ecosystem services and natural capital accounting has been useful in highlighting the important environmental services provided by peatlands, including flood control, renewable energy, etc. the social contribution of the peatlands to human wellbeing has been undervalued. In addition, the contribution of the regenerating peatlands to our biodiversity crisis need to go beyond compliance with EU laws and towards the contribution peatlands can make to our National Biodiversity Strategy.

We believe that the industrial bogs in the midlands represent a once-in-a-lifetime opportunity to develop major new biodiversity areas which will provide havens for people and biodiversity. In order to grasp this opportunity we need to revise the National Peatlands Strategy and develop a landscape approach to our peatlands which encompasses our protected peatlands, decommissioned industrial peatlands, private peatlands (intact and cutaway), forestry on peatlands and peat soils on farms. The decommissioned Bord na Mona peatlands can become the high biodiversity bogs of the future and the management of farms adjacent to these bogs can create a mosaic of habitats to support a wide range of species.

Umeras Community Development, is a member of the Community Wetlands Forum and we are inspired by community groups such as Abbeyleix to enhance the value of our peatlands. We believe that the focus of the National Peatlands Strategy needs to be refocused to align with the government's new policy for a Just Transition for communities in the midlands to balance the economic, social and Environmental benefits of peatlands and meet our commitments under EU 30/30 to achieve 30% protected areas.

We would make the following recommendations:

1. Umeras Community Development has secured JTF funding to develop a vision for a peatlands nature park on a decommissioned industrial bog. This is just one example of the potential of the peatlands to contribute simultaneously to carbon storage, enhanced biodiversity and sustainable economic regeneration. We recommend that the National Peatlands Strategy is aligned with the Just Transition Fund (JTF) objectives to support the midlands communities impacted by the cessation of peat harvesting. This means reserving greater areas of these bogs for community projects. It is critical that some large wilderness areas are created near to Dublin which provide wildlife and people with an opportunity to get away from urban and industrial elements to enjoy peace and tranquillity.
2. Umeras Community Development is a partner in the FarmPEAT.ie Environmental Innovation Partnership (EIP) which is a results-based agri-environmental programme to pay farmers to enhance

biodiversity on their farms. The National Peatlands Strategy needs to promote a landscape approach where former industrial bogs are generated and linked to new habitats on farms.

3. Umeras Community Development is part of a consortium of local organizations proposing a Peatlands National Park on the former industrial bogs of Kildare and East Offaly. The National Peatlands Strategy should take a bold step to allocate large areas of these industrial bogs for carbon storage, biodiversity and amenity to contribute to a just transition for the midlands region. The National peatlands Strategy needs to recognize the increased potential for blue and green infrastructure to link the peatlands to other significant amenity and tourism areas creating an attraction which is important on an international scale, and which will attract increased domestic and international visitors to the area. Examples in Kildare include Umeras Peatlands Park and Lullymore Heritage Park which provide destinations that are being linked to the Barrow Blueway.

4. The National Peatlands Strategy recognizes the important potential for industrial peatlands to host renewable energy and Bord na Mona has developed major wind farms on a number of bogs. EirGrid has put forward a new vision for the development of renewable energy in Ireland with an increased focus on offshore wind which was not feasible when the National Peatlands Strategy was published in 2015. We would recommend a review of Bord na Mona's strategic plan for the peatlands in the East of Ireland, which is predominantly focused on industrial and renewable energy, with the bogs in the West of Ireland focused on biodiversity. We believe that this strategy needs to be revised to provide more of a balanced development of decommissioned bogs in the east of Ireland with more peatland areas allocated purely to carbon storage, biodiversity and tourism/amenity uses. This can be achieved by designating large areas for a Peatlands National Park which will demonstrate a long-term landscape approach our peatlands.

5. Coillte manages significant areas of forestry on peatlands in the midlands. As the timber is harvested there is an opportunity to re-wet these areas and re-wild them for carbon storage, biodiversity and tourism/amenity linked to similar land uses on decommissioned industrial peatlands.

## SUBMISSION ON THE MID-TERM REVIEW OF THE NATIONAL PEATLANDS STRATEGY

Shinglis Bog Group

Shinglis

Ballymore

Co. Westmeath



June 26<sup>th</sup> 2021

Dear Sir/Madam,

We are residents living adjacent to an area of raised bog at Shinglis, Ballymore comprising approximately 40 hectares. Grid Reference 53.52867654,-7.67809153. A map of the particular bog is attached for verification purposes.

Manual turf cutting ceased on Shinglis bog approximately thirty years ago. Both Ecologists and Ornithologists have confirmed that this bog hosts significant flora, fauna and bird species, many of which have red and amber status on the conservation lists of endangered species.

Westmeath's Biodiversity Action Plan lists Shinglis bog as an area of local county importance.

The Westmeath National Parks and Wildlife Officer has also indicated that this raised bog with its small esker system should receive a specific legal designation to protect its ecological value.

We have been advised by the Dept. of Heritage and Environment that they are not accepting applications for either SAC's, NHA,s or proposed NHA's.

A further difficulty would appear to be that 'preferred SAC/NHA sites' should exceed 100 hectares.

Furthermore, part of the peatland area is used by Coillte for growing coniferous trees. The commercial value of this coniferous wood is negligible compared to the overall ecological value of the raised bog. We are particularly concerned that the successive exploitation of this raised bog for growing coniferous trees by Coillte will degrade the site even further.

We have been advised that Shinglis Bog will degrade unless certain remedial works are carried out to conserve its ecological value.

We have also been unable to locate accessible information about Peatland Restoration projects.

Despite our best efforts, there would appear to be no designation available for smaller peatland sites, which contain endangered species.

These peatland sites provide important habitats within our landscape. While SAC's/NHA's are important for the large scale sites, a separate category should be created for these peatland sites which are pending approval.

We would respectfully suggest that a separate category/designation is created for this type of peatland site.

We would also appreciate if a liason person is also nominated by the semi-state bodies such as Coillte, with whom local communities could liase in relation to the conservation/regeneration of such sites.

Thank you,

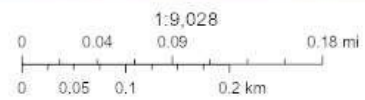
Shinglis Bog Group

■■■■■, ■■■■■, ■■■■■

## Shinglis bog & Ballyclamay Bog



June 22, 2021



Shinglis Bog, Shinglis, Ballymore, Co Westmeath  
Grid Reference 53.52867654,-7.67809153

DS, Esri, HERE, Garmin, IPC, Maxar, Microsoft

To whom it may concern,

As chairperson of Lullymore, Barnaran, Drumsru, Rathangan (LBDC) Community Alert, I would like to offer my support for the development of the National Peteland Park located in our area.

It is a very exciting prospect for our residents for many reasons. We are excited to share and preserve our beautiful area. Local job opportunities are also important for us as there are very limited job

opportunities currently in the area.

Please do not hesitate to contact me,

Kind Regards,

[REDACTED]

[REDACTED]

A chara,

Thank you for the opportunity to make a submission on the mid-term review for the National Peatlands Strategy.

I think the focus should be on rehabilitation of our bogs and rewilding at scale. This initiative has to be done in a large area allowing wildlife for free passage and to thrive. Examples of rehabilitation in the bogs are increasing and are welcome but are done on fragmented land. There is a need for a bigger vision and cohesion. Collaboration has to happen between all the agencies involved.

Green energy is important and should be developed but should be planned in areas that have been extensively damaged by peat extraction and also pursued off shore. Circling small areas of conservation with wind farms is not going to support constructive and beneficial rehabilitation projects in the long-term. There must be a balance struck between green energy needs, economic gains and environmental impact.

Protection of bogs should be extended (more areas protected) and emphasis should be put on their important role in terms of carbon sequestration.

Finally, I would urge the NPWS and Government to carry out the feasibility study regarding the idea of a national park. There is a newly formed group in County Kildare that has communicated and articulated this concept of National Peatlands Park and is ready to support this project. Their concept should be taken into consideration and developed further. Time is of essence.

Kind regards,

[REDACTED]

[REDACTED]



National Peatlands Strategy Mid-Term Review  
Peatlands Issues and Land Designation Section  
NPWS  
Department of Housing, Local Government and Heritage  
90 King Street North, Smithfield  
Dublin 7  
[NPSreview@housing.gov.ie](mailto:NPSreview@housing.gov.ie)

Dear Minister Noonan,

Re: National Peatland Strategy Mid-Term Review

WildKildare welcomes the opportunity to contribute to this timely review of the National Peatlands Strategy. Over the last four years WildKildare through its network of volunteers and experts have catalogued and helped protect the rich biodiversity of Kildare's peatlands, both intact and recovering. This was achieved via thousands of man hours observing and submitting species data records to the Nation Biodiversity Data Centre, and via on site conservation projects such as the Ballyteague Bog Curlew Project etc. Our submission on some of the key actions within the Peatlands Review follows.

**Action No. 8**



Wildkildare warmly welcomes the peatland rehabilitation measures announced by the State and Semi State bodies under the auspices of the Peatland Strategy Implementation Groups. We strongly believe that ecosystem-based solutions to issues like Carbon sequestration, flood relief, water quality and biodiversity protection are most effectively and economically dealt with this way. In light of this we strongly urge that no future use of these rehabilitated peatlands be contemplated that compromises these environmental goals. In this regard we would have concerns about Bord na Móna plans for major industrial windfarms on some these rehabilitated bogs, especially ones that already host regionally/nationally important populations of protected/endangered species of flora and fauna. Such concerns have also been recently expressed in the national media by some of Ireland's leading peatland ecologists such as Catherine Renau Wilson of Trinity College.

#### **Action No. 16**

Wildkildare is very concerned about the ongoing degradation of existing peatland in Kildare and more widely by commercial turf production via private operators using heavy machinery that appears to be still widespread, even on Special Area of Conservation (SAC) bogs. The latter is in flagrant breach of both National and EU legislation and reflects very poorly on the State in general and on the government bodies that are charged with overseeing the protection of SACs. Wildkildare is hopeful that the recent Departmental review of NPWS operations can go a significant way to addressing this pressing issue.

#### **Action No. 5**

The production of peatmoss is clearly in conflict with all the aims of retaining ecologically functioning peatland areas. This fact needs to be reflected in

national laws regulating this activity. This at the very least requires the reinstatement of the requirement for planning permission for such activities, which was bizarrely and inexplicably removed by the previous government.

#### **Action No. 28**

WildKildare is strongly supportive of the National Peatlands Park proposal for the Kildare/Offaly region and calls on the Government and relevant state agencies to direct Bord na Móna to fully co-operate with getting this project fully implemented.

#### **Action No. 24**

The ongoing delay and apparent lack of urgency concerning the government publication of robust and appropriate planning rules on wind energy development has resulted in damage and loss to extensive areas of Blanket and Raised Bog sites(both intact and recovering). This deeply unsatisfactory situation has also come to the attention of the legal arms of the EU via the ECJ ruling on the Derrybrein case and further damage to Irelands reputation was more recently inflicted when windfarm construction on a peatland site in Donegal just before last Christmas, resulted in catastrophic damage to rivers and EU designated sites on both sides of the border. The NI exec is currently looking into a potential criminal prosecution arising from these events. Other windfarm developments on such sites have caused local flooding and water quality issues in other parts of the country such as in North Mayo within the Owenmore catchment which is an important game fishery. Despite these growing number of cases the planning agencies in this state(notably An Bord Pleanála) continue to give consent for major wind energy developments in such areas. It is also regrettable that semi –states agencies such as Coillte and Bord

Na Mona continue to adopt a strategy of aggressively targeting sensitive peatland sites for such inappropriate developments, often against the backdrop of strong opposition from local communities, local councils and Environmental NGO's. All these issues were further highlighted recently in the Highcourt ruling, quashing permission for a major wind farm on a BNM bog in Derryadd Longford where the company ignored the plans for a Mid Shannon Peatlands Wilderness Park on the same site despite strong support from the local community, Longford CC and regional tourism interests. WildKildare hopes that BNM will adopt a more constructive approach concerning the plans for the Kildare/Offaly Peatlands Wilderness Park mentioned earlier in this submission.

Finally WildKildare would like to conclude this submission by highlighting this states responsibilities under the EU 2030 Biodiversity Action Plan that seeks to designate up to 30% of the land mass for nature protection. We would submit that the peatland acreage owned by the Semi-state agencies mentioned above be a key part of Ireland fulfilling the requirements of this EU Directive.

Yours sincerely,

A solid black rectangular box used to redact the signature of the Committee Member.

Committee Member WildKildare

## **Comhairle Contae na Mí**

*Teach Buvinda, Bóthar Átha Cliath, An Uaimh,*

*Contae na Mí, C15 Y291*

**Fón: 046 – 9097000/Fax: 046 – 9097001**

*R-phost: customerservice@meathcoco.ie*

*Web: www.meath.ie*

*Uimhir Chláraithe: 00172770*



## **Meath County Council**

*Buvinda House, Dublin Road, Navan,*

*Co. Meath, C15 Y291*

**Tel: 046 – 9097000/Fax: 046 – 9097001**

*E-mail: customerservice@meathcoco.ie*

*Web: www.meath.ie*

*Registration No.: 00172770*

Peatland Issues and Land Designation Section

National Parks and Wildlife Service,

Department of Housing, Local Government and Heritage,

90 King Street North,

Smithfield,

Dublin 7

D07 N7CV

30<sup>th</sup> June 2021

### **Re: National Peatlands Strategy Mid-Term Review**

Dear Sir/Madam,

Meath County Council welcomes the opportunity to contribute to the mid term review of the National Peatlands Strategy. The importance of our peatlands is acknowledged as they contribute to biodiversity, assist with regulation of climate, water filtration and supply etc. In addition, peatlands are widely used as an amenity resource for local residents and also are a tourism resource.

There are a number of international and nationally important sites designated for nature conservation in County Meath. These include the following sites of relevance to the strategy review.

#### **Special Area of Conservation**

<b>Site</b>	<b>Site Code</b>
Mount Hevey Bog	002342

#### **Candidate Special Area of Conservation**

Site	Site Code
Killyconny Bog	000006
Moneybeg & Clareisland Bog	002340
Girley (Drewstown) Bog	002203

#### **Natural Heritage Areas**

Site	Site Code
Jamestown Bog	001324
Molerick Bog	001582
Girley Bog	001580

Page of 3

#### **Proposed Natural Heritage Areas**

Site	Site Code
Doolestown Bog	001577
Kilconny Bog	000006
Thomastown Bog	001598

The current Meath County Development Plan is available to view at the following location:

<https://meathcountydevelopmentplan.files.wordpress.com/2011/01/meath-county-developmentplan-2013-2019-consolidated-version-written-statement-december-2016.pdf>

The review of the current Meath County Development Plan 2013-2019 is ongoing. The anticipated adoption date of the Meath CDP 2021-2027 is September 2021.

Further details can be accessed at: <http://countydevelopmentplanreview.meath.ie/>.

The County Meath Heritage Plan 2015-2021 is available at the following link and should be consulted. The review of the plan is due to commence shortly. [County Meath Heritage Plan | Meath.ie](#)

The County Meath Biodiversity Plan covers the period 2015-2020 and is available from the following link- [Meath Biodiversity Action Plan | Meath.ie](#)

#### **General Comments**

- It is noted that the National Peatlands Strategy has as its vision statement *“to provide a longterm framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contribution to the well-being of this and future generations”*. Co-ordination of the roles of the various sectors which have a remit in peat land management is considered to be central to implementing a successful management framework.
- The increased recreational use of peatland areas during the Covid 19 pandemic has generated additional visitor related management issues. The strategy review needs to take account of this changing context.
- Measures to address illegal dumping and adequate resourcing of local stakeholders (including Local Authorities) to address same should form part the strategy review.
- A partnership approach involving local communities and other key stakeholders to

develop a shared vision has worked successfully in the case of Girley Bog. Girley Bog Meitheal is a management group involving many different stakeholders with an interest in the bog. This group, in partnership with the Irish Peatland Conservation Council, developed a 10year conservation action plan for the site in 2015. Implementation of this plan is ongoing.

The Council requests that the above comments are considered as part of the review process.

Yours Sincerely,

---

Senior Planner

For the attention of the National Peatlands Strategy Mid-term review

Please find attached our submission re the mid term review, our group is the Killyconny Bog Project established almost a year now and our focus is being an interest group established principally towards supporting the National Parks and Wildlife Service in the peatlands management of the habitat on S.A.C. 00006, otherwise known as Killyconny Bog. Killyconny Bog Project will also collaborate and support any stakeholder(s) or local stakeholders in the achievement of its main objective.

If you would acknowledge receipt of our submission  
keep safe [REDACTED]  
Secretary of Killyconny Bog Project



30<sup>th</sup> June 2021. National Peatlands Strategy midterm review

Submission on behalf of the Killyconny Bog Project, Rantavan Mullagh Co Cavan A82P890.

1. All peatlands and areas of marsh should be rewetted as a matter of urgency to combat climate change and reinstate biodiversity. A positive media campaign on the benefit of peatlands to accompany the national rewetting program.
2. Organic slurry spreading should be applied by low emissions method only, to protect biodiversity.
3. No slurry spreading derogations within 1km of an SAC.
4. Soils around peatland SACs should be required to be independently monitored every 2 years and advise on levels of soils ability to absorb nutrients. The soil test results should inform on the proposed nutrient loading.
5. Nutrient loading to be tied to farm payments, penalties for excessive nutrient loading.
6. Encourage/ financial incentives for landowners to retain and re- wet bog and marsh areas and plant native crops suitable for feeding wildlife on peatlands.
7. Rules governing SACs should be rigorously enforced.
8. All peat extraction should cease immediately.
9. Regular published updates on progress on approved wetland schemes.
10. All native Hedgerows should have immediate protected status. Where development requires removal of a hedgerow, the development should include provision for replacement of same on site.
11. We need a positive national media campaign covering the value of hedgerows and their biodiversity and carbon sequestration.
12. Rules and regulations in the past were lightly enforced to the detriment of nature, and now will have to be enforced. Additional powers to be given to LA and NPWS staff such as the red card system of the Nitrates Regulations. Staff numbers to be increased in the wildlife department.





National Peatlands Strategy Mid-Term Review,  
Peatland Issues and Land Designation Section,  
**National Parks & Wildlife Service**  
Dept. of Housing, Local Government & Heritage,  
90 King Street North,  
Smithfield,  
D07N7CV.

29<sup>th</sup> June, 2021

**Re: National Peatlands Strategy submission**

To whom it may concern,

I am writing on behalf of Kildare County Council's Local Community & Cultural Strategic Policy Committee which is chaired by Cllr. Aoife Breslin.

At its meeting held on 6<sup>th</sup> May last, the committee hosted a presentation by Ms. Lorraine Benson MSc (Env. Sc.), PhD regarding a proposed new National Peatlands Park. Ms. Benson was supported by her colleagues Dr. Jesmond Harding (Butterfly Conservation Ireland), Tristram Whyte (Irish Peatland Conservation Council) and Ray Stapleton (Lullymore Heritage Park).

The new national park would be based mainly in County Kildare as well as in the eastern part of County Offaly. The committee was very enthusiastic about the proposal and agreed unanimously to support the project at every opportunity. This amenity would be the first such national park to be based in the midlands and the members considered it a very significant development for use of cutaway peatlands. Accordingly, I am requesting that you accept this letter of support as a formal submission by Kildare County Council's Local Community & Cultural Strategic Policy Committee to the National Peatlands Strategy.

You might wish to note that Kildare County Council's Local Community & Cultural Strategic Policy Committee will be making a similar submission of support as part of the draft County Kildare

Development Plan 2023-2029 when the opportunity arises. In addition, I will be writing to Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media Catherine Martin requesting her support for the project. I would be grateful if you would acknowledge this submission to enable me to keep the committee apprised of developments.

[REDACTED]

Administrative Officer

Dept. of Economic, Community & Cultural Development

National Peatlands Strategy Mid-Term Review,  
Peatland Issues and Land Designation Section,  
National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
Dublin 7 D07 N7 CV.

By email: [NPSreview@housing.gov.ie](mailto:NPSreview@housing.gov.ie)

30<sup>th</sup> June 2021

A Chara,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the public consultation on the mid-term review of the National Peatlands Strategy.

Having regard to the time period since the adoption of the National Peatlands Strategy in 2015 the conversations around peatlands use, environmental and biodiversity goals, climate action, just transition and the commercial use of peat have all changed significantly. The landscape of our peatlands particularly in the midlands will change from 'brown to green (and blue' in the coming years. Furthermore, the future tourism and recreation potential of peatlands has been brought into greater focus. Therefore, it is considered timely to review the strategy at this point in time.

Within the context of the National Peatlands Strategy 2015 -2025 vision statement, where the aim is to provide a long-term framework to optimise the peatlands contribution to the 'social, environmental and economic' well-being of this and future generations, Fáilte Ireland welcomes the opportunity to provide insights on the Mid-Term review. We are eager to ensure that the potential that tourism and amenity development can bring is recognised within the updated National Peatlands Strategy. Climate action and Bord na Mona suspending peat harvesting brings about an

opportunity to reimagine tourism and its development within Ireland's peatlands.

A number of proposed changes to the actions set out in the Strategy are recommended to appropriately reflect the ongoing work by the National Tourism Development Authority and to prioritise actions for implementation in relation to tourism and recreational use. A key strategic pillar of Fáilte Ireland's Strategy is 'Opening the Outdoors' with the goal to transform Ireland's outdoor tourism experience. There is a growing consumer segment that want to get out in nature and have outdoor experiences, particularly walking but also cycling and water-based activities. Covid-19 has accelerated this by increasing everyone's appreciation of the outdoors and our peatlands have an important role to play in our outdoor product offering.

## **Overview of Submission**

Within this submission, we have outlined the importance of tourism as a Key Economic Driver at National, Regional and Local Level, the importance of peatlands from a biodiversity and unique habitat perspective and the potential of peatlands for sustainable tourism opportunities. We have also identified where possible and appropriate, recommended actions which will support this alignment.

### **1. Tourism as a Key Economic Driver at National, Regional and Local Level**

Tourism is undoubtedly amongst Ireland's most important indigenous economic sectors. It is a significant employer, supporting 260,000 jobs prior to the onset of the Covid-19 pandemic in early 2020. It generated approximately €9 billion for the Irish in economy in 2019, with export revenues accounting for over €6.9 billion of this via expenditure by overseas visitors travelling to and within Ireland. In addition, domestic tourism generated something in the region of a further €2 billion.

Apart from its overall economic importance, the importance of tourism to local and regional economies cannot be understated. In many rural areas, it is the only employer of note outside of agriculture. Analysis published by Ernst and Young (Potential impact of Covid-19 on Irish Tourism, April 2020) indicated a significant proportion of jobs dependent on tourism in rural counties such as Kerry (18%), Donegal (13%) and Waterford (12%). In many such areas, there are no alternative sources of employment.

Notwithstanding its economic value, tourism also has other qualities which are difficult to measure but contribute greatly to the social benefit of communities. Tourism amenities

within localities make them better places to live for local residents, whether by providing attractions and activities or offering good quality hospitality and events. In a post-Covid world where remote working is becoming the norm, regional towns and villages that are nice places to live with strong tourism & leisure infrastructure can transform the economies of regional Ireland beyond tourism.

In addition, tourism plays an important role in promoting Ireland's image abroad, generating a positive impression of Irish people, landscape and culture for our visitors which can influence other aspects of our relationship with the world, whether in investment decisions or educational choices.

Investment in Tourism and tourism assets has proven to be an 'enabler and multiplier' for many other sectors. The Wild Atlantic Way tourism experience brand is a prime example of this. It leverages Ireland's unique geographical positioning along the Atlantic Ocean by allowing visitors engage with and understand how the sea shaped our coastal communities, our lifestyle and our traditions. It highlights the ability of the National Tourism Development Authority to develop, coordinate and work collaboratively to advance common tourism, environmental and other goals.

However, Investment in the development and enhancement of tourist attractions, including historical and heritage sites and outdoor infrastructure can have low levels of return on investment and will struggle to compete for private capital with sectors where there are greater returns to be had. Therefore, state investment is critical if the private sector and community groups are to develop such infrastructure, which are critical to the creation of distinctive tourist experiences. In this regard, the Just Transition Plan for the Midlands has the potential to generate sustainable employment in green enterprise in the region, develop amenities and trails along with the regeneration of midlands towns and villages.

## 2. Nature Conservation and Peatlands

As the National Development Authority for tourism in Ireland, Fáilte Ireland recognises and will continue to ensure that all tourism initiatives it is involved in are planned, developed and managed in a sustainable and integrated manner. The main objective in working towards a sustainable tourism sector is to protect, enhance and promote both our natural and built heritage for the common benefits of visitor, industry, community and the environment.

Driving Decarbonisation of the tourism sector is a key priority of Fáilte Ireland's strategy. Fáilte Ireland is committed to working towards ensuring that the tourism sector

plays its part to help deliver Ireland's commitments under the Paris Agreement on Climate Change. Ireland should have the ambition to be amongst the world-leaders in sustainable tourism practices.

Peatlands are particularly important from a carbon sequestration perspective as they are vast stores of carbon and are subsequently one of our most valuable resources in helping to tackle climate change. As well as supporting a wide range of biodiversity, they provide society with a range of ecosystem services which benefit our health, wellbeing, and environment.

We welcomed the recent Government's announcement of €108 million in funding for Bord na Móna's large-scale peatlands restoration project. This will provide opportunities to enhance tourism in the midlands and Fáilte Ireland will work with the relevant stakeholders to build on this and help maximise these opportunities in a sustainable manner.

Fáilte Ireland is a partner in Wild Atlantic Nature LIFE IP, a 9-year EU-funded LIFE Integrated

Project, working with farmers, local communities and land owners to add value to the wide range of services provided from our Special Area of Conservation (SAC) network of blanket bogs and associated areas. Key outputs of will include the preparation of Guidelines for the Sustainable Presentation and Management of Tourist Access to Natura 2000 Sites along with the organisation of Community Workshops to maximise the potential in nature for local tourism with local stakeholders including community groups and landowners.

Fáilte Ireland is also part of the LIFE IP Peatlands and People Project steering group which has the aim to be 'Ireland's Climate Action Catalyst'.

3. Leveraging peatlands for sustainable tourism & employment opportunities  
Ireland's natural assets are the bedrock upon which Irish tourism has been developed. They are drivers of international demand and vital to Ireland's visitor experience. Fáilte Ireland's strategy highlights that there is a growing consumer segment that want to get out in nature and have outdoor experiences particularly walking but also cycling and water-based activities. Covid-19 has accelerated this by increasing everyone's appreciation of the outdoors and changing the way we socialise.

There is increased demand for outdoor activities, eating and cultural events among visitors and communities alike, and improving our outdoor experiences will directly enhance the quality of holiday / life of both groups. All Ireland's regional brand areas (Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Dublin) are well positioned to develop motivating tourism outdoor experiences that can tap into this need.

However, Ireland's Hidden Heartlands Brand has perhaps the greatest potential in this regard due to a convergence of many factors. The brand proposition is to *'Explore the green heartlands of Ireland's natural rural beauty, where activity and relaxation are centred around rural communities and their lifestyles; and can be discovered across a latticework of land and water trails, showcased by the iconic River Shannon and the Beara Breifne Way'*.

The Just Transition Fund and Bord na Mona's 'Brown to Green' initiative in addition to the Rural Regeneration & Development Fund (RRDF), Outdoor Recreation Infrastructure Scheme (ORIS) and the Climate Action fund will transition the region to a 'greener' experience and potentially become a standout ecotourism destination of the future with peatlands being a core element of the proposition.

Fáilte Ireland greatly welcomed that in the third and most recent call for applications under the RRDF in June 2020, the fund specifically highlighted the ability of Tourism projects to act as a key driver for economic recovery in the post Covid-19 environment, providing an immediate stimulus to support the recovery and further development of rural economies and communities; *"Projects which consolidate and better position our strong existing tourism offering, with particular focus on projects in pursuance or support of existing Masterplans, major tourism routes (for example, the Wild Atlantic Way) or Visitor Experience Development Plans. In addition, projects which improve infrastructure for existing tourism trails and amenities and those which seek to avail of evidence-based opportunities, including environmental or ecotourism or marine and activity tourism."*

Focussing on the midlands, the peatlands provide a rich story to be told to our visitors through land access, interpretation, sculpture and people. The peatlands can create a compelling proposition for the visitor allowing them to move slowly through the landscape, learning about the industrial heritage and environment on their journey while being active in nature.

Fáilte Ireland has commissioned Outdoor Recreation Northern Ireland (ORNI) to undertake a feasibility study on the future tourism potential of the peatlands in the midlands. Initial and emerging findings from this extensive study/research highlight the following opportunity areas;

## Green Experiences

The convergence of many factors lends itself to Midlands being a more 'green' experience and potentially become a standout ecotourism destination of the future. The landscape will change over time from brown to green and blue interwoven with sustainable energy production. The Just Transition will incentivise green enterprises along with the development of amenities and trails.

We know from international examples such as Slovenia, New Zealand, Costa Rica who are seen as leaders in eco/sustainable tourism that it can bring real opportunities to a destination. The positioning of the 'greening' of Ireland is a potentially powerful one and a brand fit for Ireland's Hidden Heartlands and parts of Ireland's Ancient East with the opportunity to be a first mover in eco-tourism nationally.

## Network of Trails

The peatlands (as a result of the cessation of peat harvesting) potentially offers a unique opportunity for land access via Bord na Móna rails, bridges and bog roads. It also gives rise to a network of off-road trails (and waterways – Shannon Masterplan playing a key role) which includes over 700km of narrow-gauge railway. It is noted that current plans would see the removal of a substantial portion of this network for rehabilitation. It is therefore crucial that the Land Use strategy under development by Bord na Móna considers the potential trail development from the outset in parallel with all other land uses.

The Camargue Regional Nature Park in France which extends to over 85,000 hectares showcases what can be achieved in a similar landscape setting. The park provides an extensive network of safe, segregated cycling and walking paths that link to an existing network of rural on-road networks.

## Industrial Heritage

The industrial heritage of the peatlands and in particular the Bord Na Móna heritage is a nationally important story. Bord Na Móna and ESB archives/collections are extensive with many oral histories to be told. The role of communities in telling this story would be vital with interpretation being a key element in sharing the story of the midlands landscape as people encounter stories on the trail network as well as at visitor hubs.

Internationally, Zollverein Coal Mine Industrial Complex in Germany which is a UNESCO World Heritage Site is considered good practice. The Coal mine, closed 1986 with the building surviving examples of industrial culture. It has been transformed into a prime site for the art, culture, and the creative sectors. A Museum showcasing the formation of coal 300 million years ago to its transformation today along with modern art galleries,



exhibition halls, restaurants, swimming pool and an ice-skating rink are key elements of the experience. It attracts more than two million visitors a year.

### Visitor Centres & Bog Experiences

The peatlands (as a result of the cessation of peat harvesting) potentially offers a unique opportunity for land access via Bord na Móna rails, bridges and bog roads. It also gives rise to a network of off-road trails (and waterways) – with the brand tag line of Ireland’s Hidden Heartlands ‘*Yours to uncover*’ becoming a reality. A number of existing attractions require investment to update and elevate within the region. The mooted Eden Shannon is potentially a good brand fit for IHH and should be supported if sustainable. However, an attraction of scale may not fit with the authentic, intimate proposition of the IHH. As the landscape will evolve over time, it is difficult to pre-empt some visitor opportunities in this area. Development of other peatland-based community-led experiences and trails are to be encouraged and will have a positive impact but this needs to occur within a clear framework.

### Accommodation

Faite Ireland is proposing to develop an Eco Accommodation Strategy for Ireland’s Hidden Heartlands in tandem with the development of a Regional Tourism Plan for the destination. Through the provision of best-in-class alternative eco accommodation offerings, visitors to the emerging peatlands visitor experience could be offered not just accommodation, but exciting, authentic and experience aligned nature-based offerings.

### Designations

A number of initiatives are currently in place which need careful and co-ordinated decision making. Room for sub brands such as Biosphere/Wilderness Park but these are not the overarching brand from a Tourism Marketing perspective. National Park and World Heritage Status designations have resonance with visitors but require huge resourcing to implement and manage. Further consideration in this area is warranted.

## 4. Interactions/Impacts of National Peatlands Strategy and Tourism

The review of the strategy is key to both our peatlands and tourism. The review affords the opportunity to ensure that the formulation of policies and actions appropriately acknowledge and support the positive role that peatlands can play within tourism and to ensure that the tourism and amenity value of our peatlands is fully recognised and valued. A strong peatlands strategy with tourism as a priority sector within it, will help to ensure that the interests of both are recognised. This will also enhance and promote co-operation between stakeholders.

The built, natural and cultural assets constitute the core assets of the tourism industry and are essential to sustainability of the sector. However, often the tourism sector has no direct control over these assets and so depends on strong and transparent working relationships with agencies such as Bord na Móna, Office of Public Works (OPW), National Parks and Wildlife Services (NPWS), Coillte, Waterways Ireland and Local Authorities to name but a few. As the owners and managers of these assets, Fáilte Ireland seeks to partner and work with these agencies to optimise the visitor experience of state-owned lands and assets including our peatlands, wetlands and waterways. This is key to positioning tourism on the agendas of those who directly manage and deliver the visitor experience but may not have tourism as their main remit. Fáilte Ireland is currently engaging with Bord na Móna in relation to the development of their Land Use strategy.

It is also key to note that the delivery of the peatlands strategy and just transition is not the single remit of any one agency or department and that a whole of government approach will be required, taking key areas and linkages with climate change, environment, agriculture, land use, tourism and recreation to name but a few, into account. Having regard to the myriad of agencies involved and the governance structure surrounding our peatlands and Just Transition to date there has been a haphazard approach to recreation and tourism development. It is imperative that there is greater coordination and joined up thinking across all stakeholders moving forward.

Fáilte Ireland as the National Tourism Development Authority is committed to ensuring that the tourism infrastructure is developed sustainably. Key to this in a peatlands context is to ensure that the development of amenities and trails should be considered from the outset so as to create a coordinated green network for recreation and sustainable green transport, connecting peatlands communities with one another and with larger towns. It is imperative that tourism development and amenity is considered and planned for in all peatland's strategies, landscape and land use plans going forward and not to be retrofitted or considered subsequently.

## 5. Recommendations to the Mid-term review

The National Peatlands Strategy Mid-Term Review presents a huge opportunity for the development of peatland-based tourism in Ireland and an opportunity to support a world class peatland's experience which could step change Ireland's global eco-tourism. The following presents a distillation of our key recommendations on how this can be achieved, and we ask that the Department of Housing, Local Government and Heritage give these serious consideration in the updated strategy.

- **Fáilte Ireland should be recognised as a Relevant Public Authority in the updated National Peatlands Strategy.** As the National Tourism Development Authority, Fáilte Ireland's role is to support the long-term sustainable growth in the economic, social, cultural and environmental contribution of tourism to Ireland. Investment in Tourism and tourism assets has proven to be an 'enabler and multiplier' for many other sectors. Having regard to the current ongoing research in the future tourism and recreation potential of peatlands and our engagement with the relevant state agencies and stakeholders, it is considered that the authority has an important role to play in the sustainable development of our peatlands and just transition.

For Fáilte Ireland the main objective is to develop a sustainable tourism sector which contributes a positive economic and social contribution to Ireland. Environmental protection, economic competitiveness, community & visitor awareness and involvement, all play a part in successfully achieving and delivering on this objective. Our natural landscape and our industrial heritage are some of our greatest tourism assets and the 8 strategic pillars within our strategy support sustainable development in order to protect, enhance and promote both our natural and built heritage for the common benefits of visitor, industry, community and the environment.

- **A stronger focus on tourism, amenity and recreation use is required in the updated strategy.** Actions for priority in the period 2021-2025 should reflect the changed landscape we are now operating in since the adoption of the strategy in 2015. The integration of tourism and recreation into stakeholders' plans is crucially important and should be encouraged.

Tourism has the ability to reach areas of the country where other sectors fail to penetrate or provide benefits. The tourism potential of our peatlands should be strengthened within the updated strategy for the value it can deliver to the economy, in particular employment, community activation and for the strong interdependency between tourism and other sectors. This is particularly the case for the midlands and the opportunity of Ireland's Hidden Heartland becoming a standout 'green' / eco-tourism destination of the future with peatlands, wetlands and waterways an integral part of the tourism offering.

- **The updated strategy and prioritised actions should support the development and delivery of the Regional Tourism Plan for Ireland's**

**Hidden Heartlands**, an overarching tourism framework to identify the sustainable tourism development priorities that will help to unlock the potential of the region bringing benefits to all stakeholders and industry. The peatlands have a key role to play in creating a compelling proposition for our visitors in the region.

We hope this submission is helpful in the consideration of the tourism potential of peatlands and the strong case made to ensure it will be brought into greater focus and an area of prominence. We look forward to engaging with the Department of Housing, Local Government and Heritage and other stakeholders further in the delivery and implementation of the strategy in the period 2021-2025. Please do not hesitate to contact us if you have any further queries or questions.

We thank you for your time and consideration of our submission.

Is mise le meas,



Planning & Environment Manager

National Peatlands Strategy Mid-Term Review,  
Peatland Issues and Land Designation Section,  
National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
Dublin 7

Sent by email to: [NPSreview@housing.gov.ie](mailto:NPSreview@housing.gov.ie)

30<sup>th</sup> June 2021

**Re. Submission on Public Consultation on National Peatlands Strategy 2015-2025 Midterm Review**

A Chara,

An Taisce welcomes the opportunity to comment on the National Peatlands Strategy 2015-2025 Midterm Review.

The National Peatlands Strategy 2015-2025 (NPS) was not fit for purpose from its publication.

The NPS failed systematically to provide area-based timetabled targets for reversing the biodiversity and carbon loss from continued peatlands mismanagement

The NPS failed in its conception to address the 39 recommendations set out in the multidisciplinary scientific report BOGLAND: Sustainable Management of Peatlands, published by the EPA in 2011. The recommendations included:

1. A Much needed National Peatlands Strategy
2. More Protected Peatlands
3. Proactive Management of Protected Peatlands
4. Enforcement of Regulation
5. Restoration of Protected Peatlands to stop carbon loss
6. Management of non designated peatlands to stop carbon loss
7. Review of the peat industry.

None of the clearly defined actions 2 to 6 were in any way reflected in the 2015-2025 published National Peatland Strategy. The NPS failed therefore even in the limited objectives and actions which it did set.

The 2019 six-yearly Irish report by the NPWS to the European Commission under Article 17 of the Habitats Directives on the status of designated habitats and scheduled species showed continued BAD status of peatlands.

It was the legal actions by environmental NGOs, and not any policy action, that directed legal enforcement in the following cases.

### **EDENDERRY PEAT-FIRED PLANT**

The An Taisce case taken on the phasing of the Edenderry power plant from peat to biomass ruled that the continued peat extraction supply needed Environmental Impact Assessment.

### **PEAT EXTRACTION REGIME**

Friends of the Irish Environment took a case on the 2018 attempt by the Department of Housing, Planning and Local Government to introduce regulations to remove larger scale extraction from the Planning and Development Acts regime and facilitate continued unauthorised extraction through a new EPA licencing regime. This resulted in the 2019 High Court Judgement by Mr Justice Symonds that struck the regulations down.

### **STRIKING DOWN OF NATIONAL MITIGATION PLAN**

The 2020 Supreme Court Judgement in the Friends of the Irish Environment case struck down the National Mitigation Plan under the Climate Action and Low Carbon Development Act 2015.

### **EXCEPTIONALITY IN RETENTION PERMISSION SUBSTITUTE CONSENT**

The 2020 Supreme Court Judgement in the An Taisce and Peter Sweetman cases struck down the Substitute Consent regime for development requiring Environmental Impact Assessment, and as a corollary Habitats assessment on the basis of failure to address a European Court judgement stating that retention should only be granted in exceptional circumstances.

It was primarily on the basis of the legal arguments of An Taisce and Friends of the Irish Environment on the impact of continued extraction of peat as well as biomass import unsustainably at the 2019 An Bord Pleanála hearing on the continued operation of the ESB West Offaly (Shannonbridge) plant that resulted in its refusal and the withdrawal of the parallel County Longford Lanesborough application.

Bord Na Mona in its Brown to Green Strategy has now abandoned peat extraction for horticulture and briquettes and will have phased out peat supply to its Edenderry plant by 2023.

Instead of researching and developing peat free horticultural products, the members of the Growing Media Association and other peat extraction and compost producers resisted legal enforcement on extraction. Despite the application of the Turf Cutters Compensation Scheme TCCS which will cost the State over 100 million euro, significant unauthorised peat extraction in Special Areas of Conservation raised bogs continues. This is undermining the credibility and integrity of "The National Raised Bog Special Areas of Conservation Management Plan 2017-2022".

Loss of peat soil carbon is not being addressed in the current national accounting system. Land reclamation and drainage of high peat soils is causing continued carbon soil loss. In May 2020, the EU Court of Auditors reported on the EU-wide failure of successive agrienvironmental schemes under CAP to reverse biodiversity loss, with particular reference to a number of countries including Ireland.

There is no effective regulation in place to control peat extraction, or overgrazing or other damaging activity in Blanket Bog Special Areas of Conservation or in peatland habitat designated as Special Protection Areas because of value for nesting and foraging. The NPWS is failing to take enforcement action on trespassing for peat extraction in core areas in County Monaghan, the Sliabh Beagh NHA and SPA which was donated to An Taisce by the late Paddy Rossmore in March 2020 (see Appendix 1).

Ireland now needs to ensure the practical application of the 2019 European Green Deal and the actions and targets set out in the integrated May 2020 published EU policies: "A Farm to Fork strategy for a fair healthy and environmentally friendly food system" and "EU Biodiversity Strategy for 2030 - Bringing nature back into our lives".

The EU 2030 Biodiversity strategy sets out 14-point EU Nature Restoration Plan:

1. Legally-binding EU nature restoration targets to be proposed in 2021, subject to an environmental impact assessment. By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30% reach favourable conservation status or at least show a positive trend.
2. The decline in pollinators is reversed.
3. The risk and use of chemical pesticides is reduced by 50% and the use of more hazardous pesticides is reduced by 50%.
4. At least 10% of agricultural area is under high-diversity landscape features.
5. At least 25% of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.
6. Three billion new trees are planted in the EU, in full respect of ecological principles.
7. Significant progress has been made in the remediation of contaminated soil sites.
8. At least 25,000 km of free-flowing rivers are restored.
9. There is a 50% reduction in the number of Red List species threatened by invasive alien species.
10. The losses of nutrients from fertilisers are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20%.

11. Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.
12. No chemical pesticides are used in sensitive areas such as EU urban green areas.
13. The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.
14. The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.

The changes of circumstances which have occurred since the failed 2015 NPS are multiple.

We have declared a Climate and Biodiversity Loss Emergency. Effective climate action will require turning round the state and management of Irish peatlands to end further carbon leakage and return them to storing carbon.

We now need an all of Government and multi-agency timetabled strategy to take as a starting point for the first of these objectives.

We have allowed a lost decade in advancing the recommendations of the 2011 EPA BOGLAND report.

We submit that any further consideration of the National Peatlands Strategy 2015-2025 in meeting the level of action required has no basis and that the Strategy should be declared redundant and not fit for purpose.

Yours sincerely,

XXXXXXXXXXXXXX

Head of Advocacy

An Taisce – The National Trust for Ireland



## BUTTERFLY CONSERVATION IRELAND

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June 22nd 2021

[REDACTED]  
**Maynooth,  
Co. Kildare.**  
[REDACTED]  
[REDACTED]  
[REDACTED]

National Peatlands Strategy Mid-Term Review  
Peatland Issues and Land Designation Section  
National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
Dublin 7 D07 N7 CV.  
NPSreview@housing.gov.ie

Dear Peatland Issues and Land Designation Section,

### **Re: National Peatlands Strategy Mid-Term Review 2021**

Butterfly Conservation Ireland (BCI) is pleased to contribute to the public consultation launched by Minister Noonan on April 30th, 2021. BCI is a volunteer-run nongovernmental conservation charity (Revenue Number 18161, Charities Regulator Number 20069131) founded in 2008 in response to the declines of our butterfly populations. BCI is dedicated to the conservation of butterfly habitats. BCI has a reserve at Lullybeg, County Kildare which we manage with Bord na Móna where conservation measures are applied to protect the excellent habitats so that the extraordinary butterfly and moth populations continue to thrive. We manage a reserve at Fahee North in the Burren in conjunction with the Burren Conservation Volunteers to protect Ireland's rarest butterflies. BCI operates a recording scheme and shares the data with the National Biodiversity Data Centre. BCI holds events to showcase butterfly conservation and we provide regular educational content on our website and in our Annual Report. BCI provides advice concerning the conservation of butterfly habitats and advocates the protection and correct management of our landscapes.

BCI's submission follows.

Bord na Móna and the Peatlands Climate Action Scheme (PCAS): Action 8

We congratulate the government on the delivery of measures to protect and restore peatlands announced following Bord na Móna's announcement of the cessation of peat extraction under the Peatlands Climate Action Scheme (PCAS) administered by the Department of Environment, Climate and Communications (DECC), with the National Parks and Wildlife Service (NPWS) acting as the Scheme regulator. This scheme is leading to the rehabilitation works being carried out on 33,000 hectares of bogs held by Bord na Móna. These works are setting many of the selected bogs on a trajectory towards development of naturally functioning peatland and wetland habitats.

We urge that no future use that compromises the status of rehabilitated peatlands be considered. We recommend that publicity material be generated to showcase the biodiversity benefits achieved by the rehabilitation undertaken on these bogs. This will support Bord na Móna's "naturally driven" philosophy and generate considerable positive publicity to highlight Ireland's commitment to tackling biodiversity loss, pollution, and climate change.

We note that the measures to tackle climate change and biodiversity loss under PCAS applies to 33,000 hectares of the Bord na Móna estate. What about the rest of the over 80,000 hectares held by Bord na Móna? Given that the EPA believes that Ireland will not meet its emissions reduction targets, and that Carbon Dioxide is the greatest source of emissions at 62.4% of national total GHG emissions followed by Methane at 24.6% and that both gases are sequestered by peatlands, is the extension of the PCAS scheme across the rest of Bord na Móna's landholding not a pressing issue?

#### The National Raised Bog Special Areas of Conservation Management Plan 2017-2022: Action 16

The National Peatlands Strategy Mid-Term Review document mentions the restoration measures under the National Raised Bog Special Areas of Conservation Management Plan 2017-2022 under "Implementation of Prioritised Actions 2021-2025" (page 5), and that this plan will "endeavour to ensure that turf cutting on protected raised bogs only takes place in such a way that the integrity of the Special Areas of Conservation is not threatened, will continue to be implemented". (Page 7)

BCI is very concerned about the ongoing degradation of raised bogs across the country. According to *The Status of EU Protected Habitats and Species in Ireland 2019*, the overall status of active raised bog habitat is bad and deteriorating, unchanged since the last assessment. This report states:

*The main pressures on active raised bog are peat extraction, drainage, afforestation and burning. Climate change is also considered to pose a threat in the future. The Overall Status of the habitat is Bad and deteriorating, unchanged since the last assessment.* (Page 32)

According to *The Status of EU Protected Habitats and Species in Ireland 2019*, the overall status of degraded raised bog habitat is "Bad and deteriorating, unchanged since the last assessment". (Page 33)

To take one example, Mouds Bog Special Area of Conservation in County Kildare, continues to cut for peat, illegally, and no practical measure to stop this has been taken. BCI understands that 42 plots are being cut on Mouds Bog.

Domestic turf cutting continues to this day on this site, which, BCI understands, is done without ministerial consent. Some small areas of the cutover have been reclaimed for agriculture in recent years. Burning has taken place in the recent past, and there is extensive damage in the west of the site due to previous industrial peat production. These are all activities that have resulted in the loss of species, habitat, and damage to the hydrological status of the site and pose a continuing threat to its viability. Within the last 20 years, County Kildare's last remaining Red Grouse population has ceased to exist on this bog and the Curlew has not managed to successfully breed in there in recent years.

It is our understanding that local National Parks and Wildlife enforcement staff are instructed not to patrol this site or any other protected bogs in the region. We are aware that flights have been made over the site by staff of the National Parks and Wildlife Service to take photographs of the ongoing illegal damage but despite the collection of this data, no prosecutions have been taken to ensure that the illegal activity is ended.

Why is this blatant example of wildlife crime not being tackled? There are severe penalties for damaging a Special Area of Conservation. Under European Communities (Birds and Natural Habitats) Regulations 2011 "such person shall be liable on summary conviction to a Class A fine or to imprisonment for a term not exceeding six months or to both, or on conviction on indictment to a fine not exceeding €500,000 or to imprisonment for a term not exceeding three years or to both." The other measures that are applied to deal with peat-cutting, such as The Cessation of Turf Cutting Compensation Scheme established in 2011 and extended in 2014 to include raised bog National Heritage Areas (NHAs) has not worked at Mouds Bog. It is time for enforcement action there.

#### Turf-cutting on blanket bog Special Areas of Conservation: Action 16

The Review document refers on page 7 to strategies to be considered in relation to turfcutting on SAC blanket bogs. Page 8 states "The extent and impact of use of the Difco cutter or 'sausage' machine in peatlands will be assessed within the EU LIFE Programme funded Integrated Project 'Wild Atlantic Nature'". In many areas these sites are being destroyed, with peat cut away to bare underlying rock. The issue is extremely urgent regardless of how the damage is done, and BCI is not convinced that the wording in the Review reflects the urgency required to tackle this issue fairly, and fully.

BCI is confused about peat-cutting being allowed on any protected site, raised or blanket bog.

#### Use of peat moss in the horticultural industry: Action 5

On page 4 the Review states

*Following the publication of the review report on the use of peat moss in the horticultural industry, a working group is to be established to include representatives from relevant Government Departments and State Agencies, Environmental Non-Governmental Organisations and industry stakeholders under an independent chairperson to examine the issues which were identified during the review and to report to the Minister for Heritage and Electoral Reform on its deliberations.*

The industry damages and ultimately destroys peatlands. Any casual inspection of labelling of horticultural moss peat packaging will indicate how evasive the contents descriptions are. The industry behaves like this because it knows it risks public anger and loss of sales. BCI recommends the cessation of all peat-cutting and in the interim while the process of doing this is applied, the correct labelling of horticultural peat products, stating what the package contains and the bog/s it was removed from.

### Regulation of peat extraction: Action 19, 23

On page 7 the Review states

*The existing legal framework relating to the regulation of peat extraction in terms of planning, environmental protection and habitats protection will be reviewed and recommendations developed to bring about a clearer, proportionate and enforceable system of regulation that also ensures compliance with appropriate EU environmental legislation, including Appropriate Assessment and Environmental Impact Assessment to ensure best practice in peat extraction operations.*

This action, proposed for completion in Q4 2021, is of great importance. BCI queries why peat extraction still occurs, and how the term “best practice” can be applied in relation to the destruction of peatlands.

### **Commonages: Actions 9, 12**

#### **On page 6 the Review states**

*The Department of the Environment, Climate Action and Communications and the Department of Housing, Local Government and Heritage, with assistance from Bord na Móna, will conduct an assessment of the overall ownership status of cutaway peatlands (including blanket bog) throughout the country, with a focus on determining the proportion in public and private hands. This information will be essential for identifying appropriate future uses for this land and harnessing its potential. Consideration will be given to publication of a report in line with data protection legislation.*

BCI would like to see commonages included in this assessment of ownership status. Many contain peat and peatland habitat.

BCI is pleased to see the Action A2 on pages 8 and 9 in the *National Peatlands Strategy Progress Report 2018 and 2019* but the scheme, it appears, applied to upland areas only.

BCI would like to see this applied to lowland commonages, with changes to reflect the conservation priorities on the areas. Examples of lowland commonages with areas of peat

include Harristown Common and Kingsbog Common, County Kildare, Yellow Bog, Loughrea, County Galway. None are designated, despite their high biodiversity characteristics. The lack of designated status for many lowland commonages is unjustified given the high conservation priorities represented on many of these sites.

#### Education regarding peatlands: Action 27, 29

On page 9 the Review states

*The Department of Housing, Local Government and Heritage will convene a meeting of all relevant authorities and working groups to outline each organisation's activity in education and public awareness regarding peatlands in line with the EPA Bogland Report. An updated report on bogs and education will be prepared as a result of this meeting and published by the end of 2021.*

There is a need to produce high quality materials to promote an awareness, understanding and appreciation of bogs. BCI will be happy to assist in the development of educational resources.

#### **National Peatlands/wetlands park: Action 28**

##### **On page 9 the Review states**

*The Department of Housing, Local Government and Heritage will conduct a feasibility study on the creation of a national peatlands/wetlands park to be published in 2021.*

BCI sees this proposal as complementary to many initiatives progressed in the National Peatlands Strategy. Therefore, we have prepared the following detailed submission regarding this proposal.

## **BUTTERFLY CONSERVATION IRELAND SUBMISSION TO THE NATIONAL PEATLANDS STRATEGY MID-TERM REVIEW: A NATIONAL PEATLAND/WETLAND PARK FOR IRELAND**



### **BACKGROUND**

Butterfly Conservation Ireland wishes to highlight a specific proposal to the Review. We propose the establishment of a new national park for Ireland, The National Peatland Park, to be located in northwest Kildare and east Offaly.

### **INTRODUCTORY CONTEXT**

The proposal for a National Peatland Park has been advanced since 2011.

Recommendation 9 of the BOGLAND Report from the EPA in 2011 is as follows:

*The creation of a National Peatland Park, pushed forward by local communities, deserves serious consideration and commands a degree of support from the Government. This proposed park could provide an opportunity to develop a centre of excellence for applied integrated peatland research and a national database for peatland related data and information as well as communicating information regarding peatlands.*

According to the National Peatlands Strategy A 29:

*The Peatlands Strategy Implementation Group (See Chapter 5) will be tasked with considering this recommendation. A starting point for such consideration will be an examination of existing and potential visitor facilities in the ownership of public, semiState and voluntary bodies.*

Westmeath County Council made the following submission to National Peatlands Strategy 2015:

*The land mass under peat offers potential for development of significant tourism and recreational resources including a national park for the Dublin Metropolitan Area within the midlands, together with publicly accessible parkland areas within proximity to larger towns such as Mullingar, Athlone and Kinnegad.*

While this proposal has not yet been pursued, it is referenced in The National Peatlands Strategy Mid-Term Review. The purpose of the Review is

*to provide a broad assessment of where the Strategy currently is, what it can achieve over the next five years, and, where necessary, to propose changes to the actions set out in the Strategy to refocus it in line with its overall goals and the current context.*

The National Peatlands Strategy Mid-Term Review document prepared by the Department of Housing, Heritage and Local Government states prioritised actions. One of these, at S28 is

*The Department of Housing, Local Government and Heritage will conduct a feasibility study on the creation of a national peatlands/wetlands park to be published in 2021 (in the third quarter of 2021)*

The current context, particularly the cessation of peat cutting by Bord na Móna, provides the opportunity to promote the new National Peatland Park. The need to rehabilitate peatlands, conserve remaining biodiversity at a landscape scale, to create a new relationship with our peatland heritage, meet Ireland's climate change commitments, provide a just transition to Bord na Móna employees and local communities underline the suitability of the proposal at this juncture and for the future.

The proposal to create a new national park in the east midlands near the Greater Dublin Area aligns with the vision statement of The National Peatlands Strategy 2015-2025:

*to provide a long-term framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contribution to the well-being of this and future generations.*

The National Peatland Park is also in alignment with the goals and concerns of several reports published since the National Peatlands Strategy was published, such as the following:

- The National Raised Bog Special Areas of Conservation Management Plan

2017-2022;

- The Climate Action Plan 2019;

- The Climate Action Bill 2021;

- The European Green Deal;



- The National Biodiversity Action Plan 2017-2021;
- Bord na Móna Biodiversity Action Plan;
- The Biodiversity Climate Change Sectoral Adaptation Plan 2019;
- The EU Biodiversity Strategy for 2030;
- The Wildlife (Amendment) Bill 2016;
- Heritage Ireland 2030 (in progress);
- Water Quality and Water Services Infrastructure Climate Change Sectoral Adaptation Plan (2019);
- River Basin Management Plan 2018-2021;
- Land use, land-use change and forestry (LULUCF) regulation for 2021-2030;
- Public Consultation held on draft Wind Energy Development Guidelines (in progress);
- Sustainable Development Goals National Implementation Plan;
- 2020 Programme for Government;
- The Status of EU Protected Habitats and Species in Ireland (2019).

In relation to these reports, The National Peatlands Strategy Mid-Term Review document states (page 2)

*It is necessary that the future direction of the Strategy should take the goals of these other plans into consideration, especially where there may be overlap.*

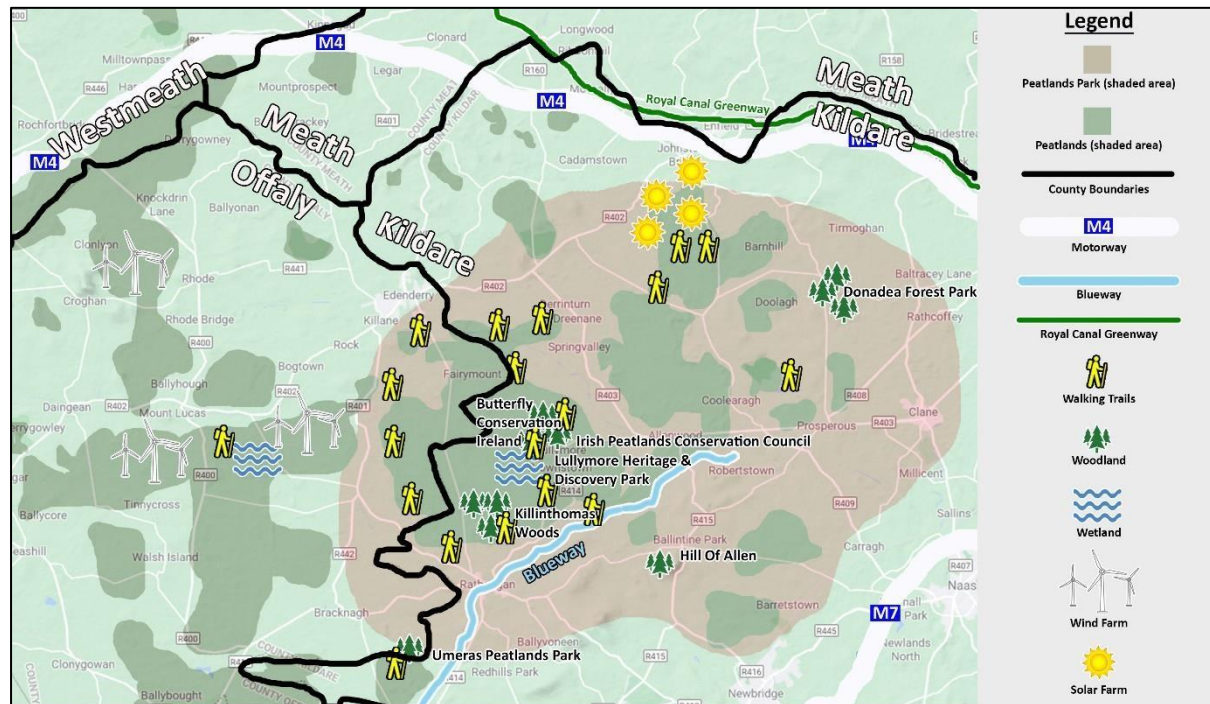
Some of these reports are referenced in our proposal following.

## 1. INTRODUCTION TO THE NATIONAL PEATLAND PARK PROPOSAL 1.1 PEATLAND NATIONAL PARK

We propose that the National Peatland Park will be located between the Grand Canal in the north and Royal Canal in the south, between Allenwood in the east and Clonbulloge in the west and including Umeras to the south-west. It is centred in County Kildare and includes peatlands in east Offaly. This land is in state ownership and consists of Bord na Móna land in the Ballydermot Bog Group, The Giltown Bog Group and other bogs already designated as Special Areas of Conservations under the habitats Directive. The Ballydermot Bog group, the largest in the portfolio includes the townlands of Lodge, Barnaran, Blackriver, Ballydermot North and South, Codd 1 and Codd2/Sheridans, Lullymore and Lullybeg, Killina, Glashabaun North and South, Derrybrennan and Ticknevin. This group comprises c.7000 hectares. The development of a national park in this area will enhance the protection of Ireland's biological diversity, store carbon and promote carbon sequestration. The tourism, and commercial and amenity potential possibilities present opportunities for local communities and business in Kildare and East Offaly.



The commercial, eco-tourism and amenity opportunities include the potential for walking, cycling, nature study, education, research, water sports. The Peatland Park will offer people a wilderness experience. As it is situated in the east midlands, it has the potential to attract visitor usage from people of the heavily populated greater Dublin area and from international visitors, bringing opportunities to an economically depressed West Kildare /East Offaly area.



This concept map shows the boundaries of the National Peatland Park region.

The development of the National Peatland Park will include existing natural amenity areas, including the walking routes along the Grand and Royal Canals. The Long Derries Special Area of Conservation, Killinthomas Wood managed by Coillte and the nature reserves at Lodge Bog and Lullymore West managed by the Irish Peatlands Conservation Council, Lullybeg Butterfly Reserve managed by Butterfly Conservation Ireland and the peatland and woods managed by Lullymore Heritage Park.

The Peatland Park can encompass areas already designated and managed by the NPWS and Kildare County Council including Pollardstown Fen and Ballynafagh. Together with the bogs managed owned by Bord na Móna, some of which are already designated for rehabilitation, these amenities provide the resources and infrastructure already for a successful, well planned, and integrated Peatland National Park.

The National Park should be developed in partnership between the various owners, and interested organisations, including Bord na Móna, Coillte, the National Parks and Wildlife Service, conservation bodies, the local community and Kildare and Offaly County Councils.

## 1.2 Bord na Móna Bogs

On 24th November 2020, Bord na Móna announced an end to peat extraction throughout its estate, which consists of 86,878 hectares (Source: EPA Boglands Report, quoted in National Peatlands Strategy Terms of Reference, 2011).



Flooded cutover bog at Lullybeg, County Kildare.

Bord na Móna is now addressing the requirements of Condition 10.2 of its Integrated Pollution Control License Ref. P0500-01:

*The licensee shall prepare, to the satisfaction of the Agency, a fully detailed and costed plan for permanent rehabilitation of the cutaway boglands within the licensed area.*

This licence condition requires Bord na Móna agree with the EPA the measures that will provide for rehabilitation, i.e., stabilisation of bogs upon cessation of peat production and compliments the licence requirement to decommission the site. Rehabilitation generally comprises site stabilisation with natural colonisation with or without targeted management.

In addition, Bord na Móna has embarked on a programme of Peatlands Enhanced Decommissioning, Rehabilitation and Restoration Scheme on its peatlands. This proposal is also known as the 'Peatlands Climate Action Scheme' (PCAS). The additional costs of the Scheme are supported by Government through the Climate Action Fund, administered by the Department of Environment, Climate and Communications (DECC), while the National Parks and Wildlife Service (NPWS) will act as the Scheme regulator.

Bord na Móna have identified a footprint of 33,000 ha as peatlands suitable for this scheme. This proposed Scheme will go beyond what is required to meet rehabilitation and

decommissioning obligations under its existing EPA Integrated Pollution Control licence conditions. Improvements supported by the Scheme will ensure that environmental stabilisation is achieved (meaning IPC obligations are met), and importantly, significant additional benefits, particularly relating to climate action and other ecosystem services, will also be delivered.

To date, six bogs within County Kildare have been selected for the programme of Peatlands Enhanced Decommissioning, Rehabilitation and Restoration. These are Timahoe North, Timahoe South, Umeras Bog, Lodge Bog, Ticknevin and Ballydermot Bog.

The works planned will create some new semi-natural habitats, such as reed swamp, poor fen, wet woodland, heath, scrub, poor fen, and embryonic Sphagnum-rich raised bog peatland communities, where conditions are suitable. Where high value habitats already exist, rehabilitation measures will be adjusted to avoid damage to these areas. The cessation of peat extraction, the large land bank, the rehabilitation measures planned, and the biodiversity resources already present provides the opportunity to develop a National Peatland Park on these lands.

### 1.3 Climate action and our peatlands

Under current legislative proposals contained in the draft Climate Action (Amendment) Bill, all local authorities have been tasked with preparing individual climate action plans outlining the mitigation and adaptation measures the authority intends to adopt and to link across such plans to other relevant statutory functions they perform, such as the preparation of their development plans.

The context for such plans is the Government's Climate Action Plan which represents an all of society approach to meeting our legally binding EU targets to reduce our carbon emissions by 30% between 2021 and 2030 and lay the foundations for achieving net zero carbon emissions by 2050. The Plan contains a range of multi-stakeholder actions across the electricity, buildings, transport, agriculture, enterprise and waste and circular economy sectors. The Climate Action Plan also advocates the need for a just transition and improving the climate resilience of all communities and citizens.

The 2020 Programme for Government sets out a clear political and societal consensus on achieving a just transition to a sustainable future for all communities in Ireland. This is to be underpinned by the core philosophy that no sector of society or community is left behind in the movement to a low carbon future. We particularly note the following commitment in under the heading *Land Use, Nutrient Management and Soil Health Land Use Review*:

*The Government will undertake a national land use review, including farmland, forests, and peatlands, so that optimal land use options inform all relevant government decisions. The review will balance environmental, social, and economic considerations and involve a process of evaluation of the ecological characteristics of the land. It will include consideration of emissions to air and water, carbon sequestration, and climate adaptation challenges. Policy co-benefits, such as rewetting or forest regrowth to mitigate flooding risks in river catchments, will be considered. All stakeholders will be consulted. (Our Shared Future, p.67)*

The Climate Action Plan also highlights the leadership role of the public sector, including local authorities, and the importance of citizen engagement and community leadership. At the heart of the Plan is the key message that climate action requires a range of thematic areas to blend to meet the challenge.

The peatlands of Kildare and Offaly within the proposed National Park will play their part in arresting carbon leakage by locking carbon onto our existing bogs. Dry exposed peat is a source of CO<sub>2</sub> and CH<sub>4</sub>. Wet, rehabilitated bogs will store carbon. Our peatlands, acre for acre, have the capacity to store twice as much carbon as the equivalent area of rainforest.

## **1.4 Biodiversity, Education and Science**

The aim of the National Peatland Park is to rewild and restore the cutaway peatlands on a landscape scale level following the cessation of industrial scale peat extraction. The Park will conserve biodiversity that has developed in cutaway habitats. The Park will provide an opportunity to develop a centre of excellence for applied integrated peatland research and a national database for peatland related data and information as well as communicating information regarding peatlands.

The new EU Biodiversity Strategy for 2030 will see the Commission propose binding nature restoration targets by the end of 2021. Through concrete commitments and actions, the EU aims to restore degraded ecosystems by 2030 and manage them sustainably, addressing the key drivers of biodiversity loss. The Commission will propose to protect at least 30% of the land in the EU. The National Peatland Park will contribute to meeting this commitment among Ireland's other biodiversity commitments.

Abbeyleix Bog, County Laois is an example of a local community taking ownership of its peatland heritage to conserve biodiversity and promote tourism. Abbeyleix Bog is a muchloved local amenity, with its boardwalks and information signs, has seen significant restoration works including drain-blocking and volunteer-led workdays to remove alien invasive species. A survey by peatland scientists in 2020 found that since works commenced, the area of active bog (i.e., where the peat layer was growing) had grown from 1% of the area to 13%.

In addition, scientists are working at Lullymore to better understand the carbon cycle and its relationship with bogs. Live experimentation involving daily measurements from Eddy Covariance towers is ongoing at Lullymore Discovery and Heritage Park to research the carbon cycle on bare peatland, grassland, and bog woodland. The research is being carried out by scientists from University College Cork, Trinity College Dublin, University College Dublin, and Waterford Institute of Technology and is supported by Bord na Móna.

## **1.5 Community Engagement and Tourism potential**

The Peatland National Park project aims to protect and greatly increase biodiversity, mitigate climate change, enhance the social and economic life of midland communities and act as a catalyst for growing a sustainable tourism industry.





The information board at Abbyleix Bog, County Laois.

The project will hope to integrate tourism and nature conservation through engagement with the local communities. The strategic development of gateways to the National Peatland Park to create sustainable visitor management and distribute the social and economic benefits across the region is envisaged. The Park will also hope to build a new relationship between local communities and their peatland heritage and environs.

## 2. THE FUTURE OF BORD NA MÓNA BOGS

### 2.1 Draft National Peatlands Strategy 2014

Recommendation 9 of the BOGLAND Report from the EPA in 2011 is as follows:

*The creation of a National Peatland Park, pushed forward by local communities, deserves serious consideration and commands a degree of support from the Government. This proposed park could provide an opportunity to develop a centre of excellence for applied integrated peatland research and a national database for peatland related data and information as well as communicating information regarding peatlands.*

According to the National Peatlands Strategy A 29:

*The Peatlands Strategy Implementation Group (See Chapter 5) will be tasked with considering this recommendation. A starting point for such consideration will be an examination of existing and potential visitor facilities in the ownership of public, semiState and voluntary bodies.*



Peatlands are the last great area of wilderness, hovering between land and water, providing unusual habitats for their unique and specialist flora and fauna. (EPA Boglands Report 2011)

This proposal has not yet been pursued. The Public Consultation on the National Peatlands Strategy Mid-Term Review is now underway. Malcolm Noonan T.D., Minister of State for Heritage and Electoral Reform launched (Friday 30 April 2021) a two-month public consultation on the mid-term review of the National Peatlands Strategy.

The purpose of the mid-term review is to provide a broad assessment of where the Strategy currently is, what it can achieve over the next five years, and, where necessary, to propose changes to the actions set out in the Strategy to refocus it in line with its overall goals and the current context.

The current context, the cessation of peat cutting by Bord na Móna, provides a great opportunity to promote the new National Peatland Park. The need to rehabilitate peatlands, conserve remaining biodiversity at a landscape scale, to create a new relationship with our peatland heritage, meet Ireland's climate change commitments, provide a just transition to Bord na Móna employees and local communities underline the suitability of the proposal at this juncture and for the future.

## 2.2 Bord na Móna Bogs in the Ballydermot Bog Group

Kildare and the adjoining land in west Offaly contain a large contiguous area of Bord na Móna bogs. The eastern midlands region has no national park, while the western seaboard counties



have five national parks with one in County Wicklow. The area of these national parks ranges from 1500 hectares in the case of the Burren National Park to 20,000 hectares in the case of Wicklow Mountains National Park. The Ballydermot Bog group, comprising Bord na Móna land in the townlands of Lodge, Barnaran, Blackriver, Ballydermot North and South, Codd 1 and Codd2/Sheridans, Lullymore and Lullybeg, Killina, Glashabaun North and South, Derrybrennan and Ticknevin comprise around 7000 hectares.

The area is a superb wilderness and consists mainly of former raised bog habitat that has been cut for peat. The peat-cutting process has resulted in the development of a range of habitats and land uses. Some of these habitats and land uses have led to the development of species-rich habitats. The main habitats that exist in the area are bogs, acid and calcareous grassland, scrub, mixed and deciduous woodland, marsh, and open water habitats such as flooded cutover bog and rivers. This diversity has resulted in a stunning landscape in many areas, with a varied landscape contour pleasing to the eye and offering a unique experience for nature lovers, walkers and ramblers, horse riding and many other activities.

The area contains such a remarkable range of biodiversity and tourism resources that it can operate as an independent entity. However, the area enjoys the benefit of additional biodiversity and tourist infrastructure such as the walking/cycling routes along the Royal and Grand Canals. These offer additional amenity and tourism potential, with considerable opportunity for sustainable employment and economic development.

As well as the rehabilitated bogs, rivers and lakes, existing facilities described below can support the success of the Peatland National Park.

### 2.3 Lullymore Heritage and Discovery Park

Lullymore Heritage and Discovery Park is a social enterprise which was started by a local committee in 1990. Since 1994 the Park has worked in partnership with state agencies, Bord na Móna and the local community to bring tourism to the area, protect and promote the peatlands, preserve local heritage and provide training and sustainable employment. The Park is a key resource in the region, providing a range of experiences such as education on biodiversity and history, as well as leisure and play.

The facility caters for school tours at pre-school, primary and secondary level, language schools, family and corporate events, and international tour groups. The range of services includes dining, walking, guided tours, seasonal events, field trips, among others. Lullymore Heritage and Discovery Park is an award-winning enterprise (ITIA Best Environmental Tourism Innovation 2017) and provides some examples of the activities and interests a National Park will offer.



Lullymore Heritage and Discovery Park. Photo Ray Stapleton **2.4 Irish**

### **Peatland Conservation Council**



Bog of Allen Nature Centre, Lullymore. Photo Tristan Whyte

The Irish Peatland Conservation Council has three sites in the area: Lodge Bog, an area of raised bog under restoration where conservation techniques are applied, a nature reserve on cutaway bog at Lullymore West managed for its butterflies and the Bog of Allen Nature Centre in Lullymore, an international centre of excellence for peatland education, conservation, and research. The centre caters for school trips, individual and family visits, providing environmental talks, demonstrations on gardening without using peat and bog walks. The premises contain a museum, greenhouse, garden, and the offices of the Irish Peatland Conservation Council.



## 2.5 Butterfly Conservation Ireland Reserve

Butterfly Conservation Ireland operates a reserve in Lullybeg. Protecting the butterfly and moth populations are the main priorities on the reserve, with active management and monitoring the impacts the chief conservation and research undertaken. The reserve is popular with visitors and visitor events are held to educate people about the habitats and species present and the conservation techniques applied. Visitor groups include Butterfly Conservation Northern Ireland and the Belfast Naturalists' Field Club. These events provide visitors with a memorable experience of the region's biodiversity.



Butterfly Conservation Ireland Nature Reserve, Lullybeg, County Kildare

## 2.6 Forest Walks

Much of the cutaway areas has been colonised by native woodland, dominated by birch, willow with some Common Hazel in places with mineral soils, and lesser amounts of Purging Buckthorn, Alder Buckthorn, Common Blackthorn, Common Hawthorn, oak, and Scots Pine. Tracks left by machinery provide good access through this high nature value woodland. Some plantation forestry exists but much of this appears not to have grown well. These areas provide great opportunities for hiking, with considerable distances available for walking. Purposely created forest walks are available in Killinthomas Wood, a very popular location with visitors from west Kildare and east Offaly. This wood offers several marked walks with exceptional views of native Bluebells in April and May.





Killinthomas Wood, Rathangan, County Kildare.

## 2.7 Walking Trails

The National Peatland Park has the potential for several walking trails based on the existing Bord na Móna industrial railway system. Some of these are located on embankments, providing commanding views over the landscape while others are quite sheltered. A number of these trails are botanically interesting in the context of the peatland landscape, as many are home to calcicole (lime-loving) plants and plants that enjoy well-drained soils. These species are an attractive addition adding colour, variety, and a range of attractive insects to the to a walker's experience.

The walking trails can be extended to join the Royal Canal Greenway walking/cycling route and the Barrow Blueway, bringing additional visitors into the National Peatland Park. Work is underway to map the proposed walking routes, which are extensive and range through the region. The trails can also be used for horse-riding. The rivers present on the bog might be used for angling. Canoeing and paddle-boarding are already popular recreations on the canals.

## 2.8 Umeras Peatland Park

The National Peatland Park will include Umeras Bog within its boundaries. There is a Community Development Proposal for the development of Umeras Peatlands Park in progress at present.

Umeras Community Development CLG (UCD) is a community group formed to promote the development of Umeras Peatland Park on the decommissioned Bord na Móna Umeras Bog located in Counties Offaly and Kildare. Umeras Peatland Park is being modelled on Lough Boora Discovery Park (<https://www.loughboora.com/>) developed by Bord na Móna, Offaly County Council and its partners in central Offaly. This is a network of footpath/cycle paths developed over cutaway bog with a complex of grassland, scrub/woodland and ponds and lakes. Umeras Bog is a 750-acre former industrial bog with deep peat deposits undergoing advanced rehabilitation by Bord na Móna into new and important wetland for County Kildare.

Umeras Peatland Park is fully aligned with the County Development Plan as it is located beside the Blueway, and the Ballykelly Mills Distillery. The peatland park is 1.5km from the Blueway at Umeras Bridge and 2km from the Blueway at Ballykelly locks and 3km from both Monasterevin and Rathangan.

The Umeras area is a biodiversity hotspot in the midlands. The Barrow SAC is located to the west of Umeras Bog which supports important flocks of wintering birds including Golden Plover, Whooper Swan and the area provides a winter roost for Hen Harriers. The rehabilitated Umeras Bog and surrounding farmland can provide habitat for ground nesting birds including Curlew, Lapwing, important birds of prey including Kestrel, Peregrine Falcon and Merlin and is potentially a site for Grey Partridge, previously numerous on the site.

## 3 Biodiversity

Biodiversity relates to the diversity of habitats, species, and genetic diversity of species in the world around us from insects in the soil, to extensive woodlands, to the animals that inhabit them. Since the 1990s, Bord na Móna has adopted a programme of enhancement of biodiversity which has become closely linked to the after-use and rehabilitation of cutaway bogs.

The rehabilitation scheme and subsequent re-colonisation of the bogs following peat production is leading to the establishment of a mosaic of habitats and species, some of which are considered rare and restricted in distribution in Ireland. The National Peatland Park together with existing organisations can present the history of the development of the bogs, the rehabilitation programme and the developing biodiversity resource as educational tours to the visiting public.

The area that will comprise the park has left peat production at various times over the last few decades. Together with variations in the topography of the landscape, moisture levels, peat depth, soil chemistry and soil types, a range of different habitats have developed.

In some areas, a number of these habitats exist in proximity, creating habitat mosaics with high biodiversity value, especially for invertebrates. This mosaic can be seen in areas such as

Lullybeg at and around N 68796 25640. Habitats that exist here are mixed and deciduous woodland, scrub, flooded cutaway, ponds, acid and calcareous grassland and fen. Within these broad habitat descriptions are habitat types defined by Fossitt (2000). The following grasslands have been identified at Lullybeg: dry calcareous and neutral grassland, dry meadows and grassy verges, dry-humid acid grassland and wet grassland. This habitat diversity is present in other areas in the region.

Notable plants recorded within the National Park on dry, calcareous substrates include Blue Fleabane *Erigeron acer*, Basil Thyme *Acinos arvensis*, Green-winged Orchid *Orchis morio*, Mountain Everlasting *Antennaria dioica* and the rare Fine-leaved Sandwort *Minuartia hybrida*, while Round-leaved Wintergreen *Pyrola rotundifolia* and Saw Sedge *Cladium mariscus* occur on wet peat soils.

Species-rich scrub exists in various areas in the area, some containing unusual species associations. For example, at N 68922 25624, Common Buckthorn *Rhamnus cathartica*, a lime-loving shrub or small tree and Alder Buckthorn, *Frangula alnus*, which favours damp peat soils, grow together, an unusual circumstance. Grey Willow *Salix cinerea*, Common Holly *Ilex aquifolium*, birch, probably *Betula pubescens*, Mountain Ash *Sorbus aucuparia*, Creeping Willow *Salix repens* are also found here. These areas of open scrub are rich in invertebrates, including several dragonfly species. Where species-rich scrub and welldeveloped bog woodland exists on the cutaway areas, these can remain undisturbed, with some necessary management to create woodland clearings and open scrub. Such management maintains a diverse vegetation structure, essential for invertebrates and birds.



Bog Rosemary occurs on wet bogs in the proposed National Peatland Park.

The Lullymore/Lullybeg/Glashabaun/Blackriver areas are particularly important for butterflies. The importance of Lullymore and Lullybeg for butterflies has been recognised for many years. A report by Nash *et al.* (2003) describes the area as one of the three important areas for

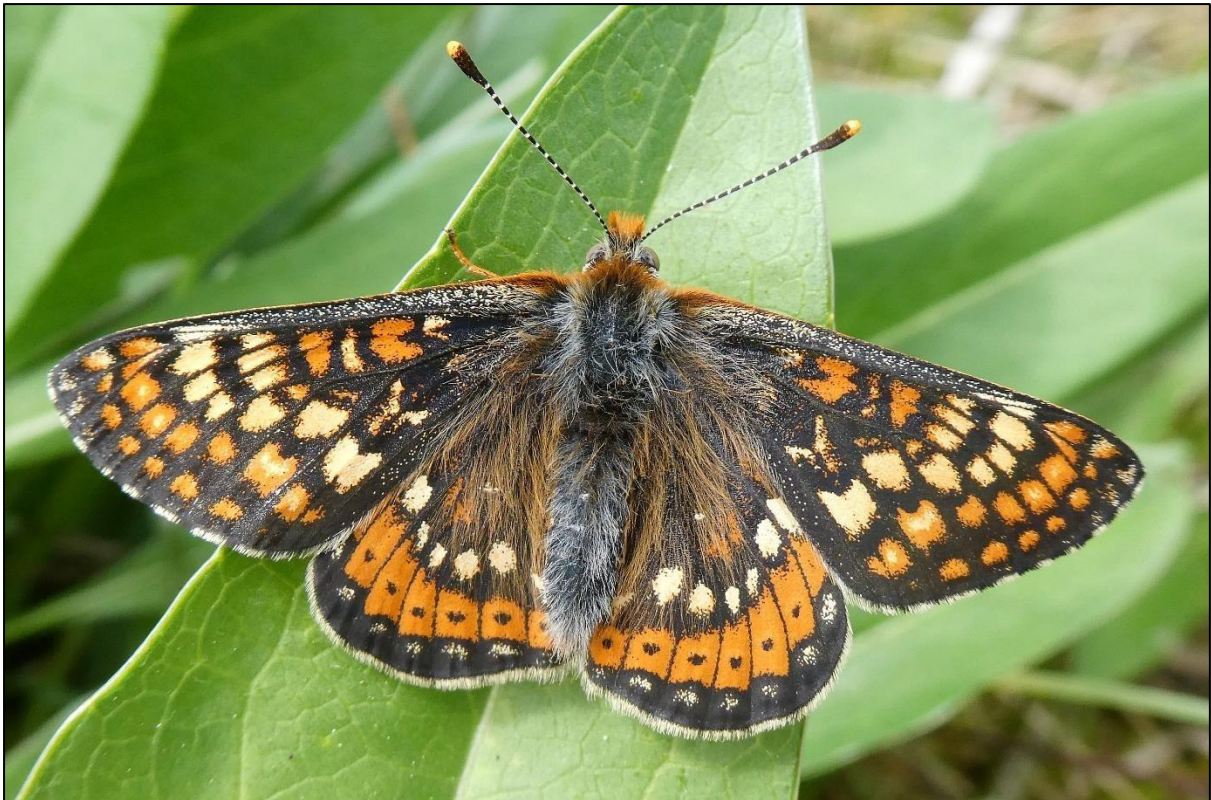


butterflies in the Republic of Ireland. Twenty-three native resident species and three migrant species (26 species in total) have been recorded in the Lullymore/Lullybeg area. Nowhere else in Ireland outside the Burren contains a similarly large number of butterfly species in a relatively small area. Accordingly, the area is popular with visitors, who study, take photographs, and enjoy the butterflies and wildflowers that are abundant in the region.



Open water, reed swamp, wet heath, wet grassland, and bog woodland mosaics will develop on some rehabilitated cutaway bogs.

Two of the butterfly species found in the area, the Marsh Fritillary *Euphydryas aurinia* and Large Heath *Coenonympha tullia* are threatened in Ireland and Europe. On the red list for Irish butterflies both species are assessed as Vulnerable. The Marsh Fritillary is listed on Annex II on the European Union Habitats' Directive 1992. Its breeding areas have legal protection. Two core populations of the Marsh Fritillary are known from the area at Lullymore, at N 69296 25844 and Lullybeg, at N 68711 25661. Outside these locations, areas of grassland rich in the Marsh Fritillary breeding plant, Devil's-bit Scabious *Succisa pratensis* may have Marsh Fritillary populations.



The Marsh Fritillary butterfly, an endangered species breeding in the National Peatland Park.

The Large Heath exists on Lodge Bog and on the remnant wet bog at N 65874 25565 and on the adjoining bog. It may also exist at N 69926 31748 and N 64469 30361. Drain blocking and re-wetting will be put in place to protect one of few remaining populations in the region from extinction. The scarce moth, Dark Tussock *Dicallomera fascelina*, rated Near Threatened on the Macro-moth Red List 2016, will also be protected by this measure. Restoration of this raised bog remnant will be a significant step to protecting specialist biodiversity in the region.

The grassland habitats support other endangered butterflies. The Wall Brown *Lasiommata megera* mainly occurs along the tracks laid down on the site and probably along the sparsely vegetated areas adjoining the Bord na Móna industrial railway. Ranked as Endangered on the red list, this species has suffered severe losses in distribution and abundance since the mid-1980s and may be Ireland's most rapidly declining butterfly. The maintenance of the current routeway infrastructure and the creation of additional potential habitat using any additional infrastructure to facilitate visitor access will be applied. The use of loose calcareous aggregate, sloped to face the south and west along these routes will generate additional potential habitat for the Wall Brown and Dingy Skipper butterfly *Erynnis tages*, ranked Near Threatened on the red list.





Flower-rich cutaway, with scrub, is important for invertebrates, and birds.

The Dark Green Fritillary *Speyeria aglaja*, rated Vulnerable on the red list inhabits flower-rich, scrubby grasslands. The population at Lullybeg and Glasabaun may be the only remaining viable populations of this species in County Kildare. Its grassland habitats will be managed by scrub control, periodic mechanical disturbance, and extensive summer grazing by cattle.

The area holds a diverse moth population, including several declining and threatened moth species. These include the Forester *Adscita statice*, ranked Endangered on the Macro-moth Red List 2016, Narrow-bordered Five-spot Burnet *Zygaena lonicerae*, ranked Vulnerable, Small Purple-barred *Phytometra viridaria*, ranked Near Threatened, Wood Tiger *Parasemia plantaginis*, ranked Near Threatened, Small Chocolate-tip *Clostera pigra*, ranked Near Threatened. A species ranked extinct on the Red List, The Suspected *Parastichtis suspecta*, was found in Lullymore cutaway in 2018.

There are some flooded areas, such as at N 68901 25450, Lullybeg. These areas are important for dragonfly and bird species. Whooper Swan use this area in winter, while Eurasian Lapwing, among other wetland species, use this habitat for breeding.

Several birds of conservation concern occur in the National Peatland Park Area. The Amber-listed birds of conservation concern 2020-2026 recorded are Hen Harrier, Goshawk, Kingfisher, Merlin, Skylark, Barn Swallow, Sand Marten, Willow Warbler, Spotted Flycatcher, Goldcrest, Greenfinch, Linnet, Whooper Swan, Mallard Duck and Teal. Together these are 19% of Amber-listed species.



The Large Emerald moth is common on regenerating cutaway bogs in the National Park area.

The Red-listed birds of conservation concern 2020-2026 recorded in the region are Swift, Woodcock, Kestrel, Meadow Pipit, Grey Wagtail, Yellowhammer, Redwing, Curlew and Snipe. These are 18% of Ireland's Red-listed bird species. The region has recently been colonised by the Great-spotted Woodpecker and Buzzard. Nightjar, a rare species listed in Annex I of the E.U. Birds Directive, breeds in one area in the region. Other notable birds include Cuckoo, Whinchat and Whitethroat.

The terrestrial mammals recorded in the National Peatland Park area are Red Squirrel, Pygmy Shrew, Irish Mountain Hare, Stoat, American Mink, Pine Marten, Otter, Fox, and Badger. Several bat species, unidentified at species level, also occur.

The amphibians recorded are Common Frog and Smooth Newt. The Common Lizard occurs in various places within the National Park.

The area of the National Peatland Park is of sufficient size to maintain the populations of animals and plants present. The area contains several qualifying features for a Special Area of Conservation under the Habitats' Directive 1992, including Marsh Fritillary, Otter, active raised bog, degraded raised bogs capable of regeneration, Molinia grassland, orchid-rich grassland, wet heath and dry heath. The destruction of the Bog of Allen in this region is a biodiversity and heritage disaster. The time has come to address this crisis, even though a different landscape is now present. Few areas in the midlands remain rich in biodiversity. The protection of the National Park from development and restoration of the bogs, where possible, will result in the protection and enhancement of biodiversity. Agricultural land in most of Ireland is modified to the extent that species formerly widespread now occur only on bog habitats, making the National Peatland Park a vital biodiversity reservoir.



#### 4 Nature Conservation and Biodiversity Corridors

The National Peatland Park area of c.7000 hectares will contain a sufficient size and habitat range to protect species, like the Marsh Fritillary butterfly, that require landscape scale protection. The management of this landscape through the government-supported rehabilitation scheme and the conservation actions, such as ride maintenance and grazing programmes, will protect the habitats and species into the future. The connection with other areas, through the corridors provided by the canals, will promote movement and gene flow, crucial to maintain the health and genetic diversity within species.



Bee Orchid on cutaway bog, Lullybeg, County Kildare.

#### 5 Time Frame for National Peatland Park

The National Peatlands Strategy has five years to run, 2021-2025. The achievement of a National Peatland Park will be a tangible, sustainable legacy of the Strategy's commitment to our peatland heritage.

## 6 The Future



What would the world be, once bereft  
Of wet and of wildness? Let them be left,

**O let them be left, wildness and wet; Long live the weeds and the wilderness yet.**  
**Inversnaid**, Gerard Manley Hopkins

On March 29th, 1887, an ailing Hopkins wrote '*I should have felt better for the delicious bog air of Monasterevin.*' We want to see our bogs appreciated by all, now and in the future.

Yours sincerely,

[Redacted Signature]

Conservation Officer  
Butterfly Conservation Ireland

Directors: Michael Jacob [Chairman] Jesmond Harding, Kieran Buckley, Joseph Harding.
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# CONSULTATION

## Response Document



### **Mid-term review of the National Peatlands Strategy. (Department of Housing, Local Government and Heritage ) 30 June 2021**

#### **Introduction to CIEEM**

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:



- Northern Ireland Environment Link
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network • Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 260 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

**This response was coordinated by our Ireland Policy Group.**

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact [REDACTED] (CIEEM Head of Policy and Communications) at [REDACTED] with any queries.

### **Comments from CIEEM**

In 2014, CIEEM welcomed the draft National Peatlands Strategy, and we are pleased to provide our perspective on the Mid-Term Review. In our 2014 submission, our main area of concern was that “the Principles and Actions lack quantifiable objectives and the Actions lack completion dates... furthermore, there is no timeframe for review or revision of the National Peatlands Strategy.” We are pleased that the Implementation Plan set out in the Review has addressed this concern.

In our comments on the then draft Strategy, we identified the use of ecosystem services as an overarching framework for peatland management as a key strength. Another was the Strategy’s inclusivity in gathering together the appropriate stakeholders in peatland management. We welcome the continuation of these approaches in the Mid-Term Review and the proposed Implementation Plan. In particular, we commend the “cooperation between Government Departments, State agencies and State bodies [the Strategy] has enabled”. We are concerned, however, at the absence of NGOs from actions where their input would be beneficial. Several NGOs, especially local community groups, have been very active in recent years in the promotion of peatland conservation, education, recreation, amenity and tourism. As they have significant on-the-ground experience in these areas, the meeting on peatland public awareness to be convened

under Action R must include such groups. Similarly, the feasibility study on creation of a national peatlands/wetlands park in Action S should include consultation with relevant ecological professionals and NGOs.

One of the main objectives of CIEEM is the promotion of the science and practice of ecology. As such, we welcome the emphasis on improving the evidence base that is present in several Actions, especially upgrading land-use and habitat mapping systems (Action A), blanket bog SAC turf-cutting strategies and methods (Actions K and N), and assessing the application of land cover data as a resource for peatland management (Action O). Action B, however, must commit to ensuring that advice provided to DAFM to update the Prescribed Burning Code of Practice is based on research and evidence from practical experience. This evidence base must be wide-ranging and comprehensive. Furthermore, the Implementation Plan should clarify when the Code of Practice will be updated.

Action D appears insufficient to meet the original action in the Strategy. The wording as it stands refers only to ensuring the commitment is in the next Forestry Programme. This permits an unacceptable delay in the provision of much-needed guidance on forestry and peatlands. A firm commitment to deliver guidance during the lifetime of the Strategy is required. It should also be noted that guidance on future afforestation of peat soils in particular is likely to require specialist ecological input, as some peatland types, especially fens, can be difficult to identify using strategic level or non-specialist surveys.

Action E on initiatives to increase delivery of ecosystem services is welcome, but the piecemeal focus on individual projects will not deliver on the ambition of the Strategy's action A8. A more strategic and comprehensive evaluation of management options on State-owned peatlands is required. For example, Coillte is identified in the Strategy as the main State owner of peatlands, but none of the projects listed in Action E are listed as Coillte's. The Peatlands Strategy Implementation Group should conduct a review of the condition of peatlands across all State owners, as well as their plans and projects to enhance biodiversity and ecosystem services, and identify where additional support may be needed to meet the Strategy's objectives.

Lastly, Action T on research and dissemination is very welcome. We would further suggest that a review of the current state of peatland research and information gaps should be undertaken towards the end of the lifetime of this Strategy. This will provide a useful baseline for the preparation of the next National Peatland Strategy.

In conclusion, the Mid-Term Review of the National Peatlands Strategy addresses many of the shortcomings of the Strategy in its original form. The Strategy and Review are based on a foundation of past and ongoing research and practical experience to which CIEEM members have significantly contributed. Therefore, CIEEM is well placed to advise on peatland conservation and management now and in the future. We would welcome any opportunities to discuss further the Mid-Term Review.

**Chartered Institute of Ecology and Environmental Management**

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## Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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### National Peatlands Strategy Mid-Term Review

The Eastern and Midland Regional Assembly (EMRA) welcomes the opportunity to participate in the public consultation on the mid-term review of the National Peatlands Strategy 2015-2025. This midterm review provides the opportunity to enhance alignment between Priority Actions of the National Peatlands Strategy and the Regional Strategic Outcomes (RSOs) and Regional Planning Objectives (RPOs) of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region.

#### Background and relevance for the National Peatlands Strategy

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on the formulation, adoption and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of Local Economic and Community Plans, management of EU Operational Programmes, EU project participation, implementation of national economic policy, and additional functions through working with the National Oversight and Audit Commission.

In line with the provisions of the Planning and Development Act 2000 (as amended), the Eastern and Midland Regional Assembly (EMRA) made the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region on the 28th of June 2019. The primary statutory objective of the RSES (2019-2031) is to support implementation of Project Ireland 2040 – which links planning and investment through the National Planning Framework (NPF) and the ten-year National Development Plan (NDP). The RSES also supports the economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Region. As part of this, it sets the context for each local authority within the Eastern and Midland Region to develop their county and city development plans in a manner that will ensure alignment between national, regional and local plans.

Central to the successful implementation of the RSES is the realisation of Regional Strategic Outcomes

(RSOs), contained as part of the Strategy and defined as a mechanism to achieve the National Strategic Outcomes (NSOs) of the NPF. These 16 RSOs are based around the three key principles of the RSES – Healthy Placemaking, Climate Action and Economic Opportunity and are aligned to the

UN Sustainable Development Goals, the EU thematic objectives and national policy to embed a coherent policy hierarchy and to ensure that future investment is targeted towards identified policy recommendations and goals.

The National Peatlands Strategy aims to provide a long-term management framework to optimise the social, environmental and economic contribution of all peatlands within the State, setting out supports, structures, funding mechanisms and regulatory frameworks to promote a partnership approach to their sustainable development. Of particular relevance to the National Peatlands Strategy are the RSES RSOs that support sustainable rural development (RSO 3), sustainable water management (RSO 7), climate resilience (RSO 8), the low carbon transition (RSO 9), enhanced green infrastructure (RSO 10) and biodiversity and natural heritage (RSO 11). Other RSOs of relevance relate to the protection and enhancement of the quality of our natural environment for healthy communities (RSO 4), the promotion of creative places and heritage led regeneration (RSO 5), and the creation of a strong economy that supports smart specialisation, cluster development and sustained economic growth (RSO 12).

### **Environment and Climate**

Chapter 7 of the RSES, Environment and Climate, recognises that a clean well protected environment supports human health and wellbeing and provides a natural resource for our agriculture and tourism industries. It also recognises that challenges remain in relation to biodiversity protection and climate resilience. In line with the approach of the National Peatlands Strategy, the RSES recognises the wideranging ecosystem services provided by our natural environment, including the role of peatlands in sequestering and storing carbon, water attenuation, flood risk management and recreation. Further to this, RPO 7.21 of the RSES requires local authorities to promote *an Ecosystem Services Approach in the preparation of statutory land use plans*.

Aligned directly with the principles and objectives of the National Peatlands Strategy, the EMRA RSES identifies peatlands as unique landscapes with important environmental, economic and amenity value. In the consideration of development on peatland areas, the RSES sets out the following guiding principles:

- Consideration of the potential contribution of peatlands to climate change mitigation and adaptation including renewable energy production;
- Consideration of habitats and species of environmental significance;
- Consideration of the potential contribution of peatlands to an existing or proposed greenway/blueway/peatway network;
- Consideration of the ecosystem services and tourism potential provided by peatlands, and; Development of peatlands with no negative impacts on water quality.

### **Developments since 2015 and policy coherence**

As set out in the mid-term review consultation document for the National Peatlands Strategy, there have been substantial developments in terms of public policy and the commercial use of peatlands since the publication of the National Peatlands Strategy in 2015. Page 2 of the document lists significant policies and plans that have come into existence since the National Peatlands Strategy was published. In addition to these, *Project Ireland 2040 – The National Planning Framework*, the *National Development Plan (2018-2027)* and the three Regional Spatial and Economic Strategies



have also been adopted. Together, these provide the overarching policy and planning framework for the social, economic, infrastructural and cultural development of our country at national and regional level to which the desired outcomes and actions of the National Peatlands Strategy should align.

In addition to plans and strategies already adopted, there are a number which are currently under development whose objectives may overlap with the National Peatlands Strategy. The *Territorial Just Transition Plan* for Ireland is currently under development, as is Ireland's first ever *National Outdoor Recreation Strategy*, a key element of *Our Rural Future - Rural Development Policy 2021-2025*, the Government's blueprint for a post-COVID-19 recovery and development of rural Ireland over the next five years. The new EU Common Agricultural Policy is also under development. The Assembly notes the need for coherence between these and other relevant policies and strategies to facilitate an effectively funded and co-ordinated approach for the future management and development of our peatlands, both in terms of existing Actions in the National Peatlands Strategy over the next 5 years, as well as potential successor Strategies.

### **Implementation of Prioritised Actions 2021-2025**

At the core of the mid-term review consultation document for the National Peatlands Strategy is an Implementation Plan which prioritises certain actions, while others have been closed and/or moved to monitoring. The Assembly notes that National Peatlands Strategy Action 6 has been moved to monitoring in the implementation plan. That is, "*The Department of the Environment, Climate and Communications, Bord na Móna, and the ESB will continue to oversee the transition of power generation away from peat in line with the Government's Just Transition programme.*". For each Priority Action (21 Actions, designated A to U), original Action Reference Numbers, Lead Body for Implementation and Timeline for Completion are included in the consultation document. The Priority Actions which are considered of relevance to the work of the Eastern and Midland Regional Assembly are reproduced in the table below with [EMRA observations included in green](#).

<p><b>A</b></p> <p>The Department of the Environment, Climate and Communications, in consultation with the Department of Agriculture, Food and the Marine, the Department of Housing, Local Government and Heritage and Bord na Móna, will upgrade land-use and habitat mapping systems to establish the baseline condition of wetlands and inform the development of bestpractice guidelines for wetland management, including the management of degraded wetland and peatlands currently exploited for energy peat extraction. This Action is scheduled for completion in Q3 2021.</p>	<p>EMRA are lead stakeholder on <b>QGasSP</b> (Quantitative Greenhouse Gas Impact Assessment for Spatial Planning Policy), an ESPON Targeted Analysis Project (October 2020 – October 2021) which is developing a robust, simple and proportionate method for quantifying and forecasting the relative GHG impacts of alternative spatial planning policies. The output will be a flexible, user-friendly web application to use in modelling GHG emissions from differing spatial planning policy options and to inform decision-making processes, including Strategic Environmental Assessment (SEA). This tool could complement the habitat mapping system for wetlands. More broadly, EMRA would welcome strategic land use guidance for degraded wetland and peatlands currently exploited for energy peat extraction and would engage with any relevant consultations or processes.</p>
<p><b>D</b></p> <p>The Department of Agriculture, Food and the Marine and Coillte will work with the Department of Housing, Local Government and Heritage to ensure the successor document to the Forestry Programme 2014-2020 commits to creating guidance and criteria for the identification and appropriate future management of peat areas currently afforested, as well as to develop guidance on future afforestation of peat soils. This Action was scheduled to commence in Q1 2021.</p>	<p>RSES RPO 6.7 is to support local authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy, tourism, and diversification into alternative on-farm and offfarm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage. EMRA would engage with any relevant consultations or processes for the development of guidance and for the identification and appropriate future management of peat areas currently afforested, as well as guidance on future afforestation of peat soils.</p>

<p><b>E</b></p> <p>The Peatlands Strategy Implementation Group will continue to monitor progress and provide support on initiatives designed to increase the delivery of ecosystem services of naturally functioning peatlands, in particular the EU INTERREG CABB (Ireland/UK Co-operation Across Borders for Biodiversity 2017 to 2022) and CANN (Collaboration Across Natura Network) projects; relevant Bord na Móna research projects; relevant Environmental Protection Agency and other research projects; restoration measures under the National Raised Bog Special Areas of Conservation Management Plan 2017-2022 and the new Bord na Móna peatlands enhanced decommissioning, rehabilitation and restoration scheme; actions undertaken within the EU LIFE Integrated Project 'Wild Atlantic Nature'; and other actions taken under relevant projects that may be established in the timeframe 2020-2025.</p>	<p>EMRA is a partner on the <b>Interreg Europe PROGRESS</b> project (2019-2023) whose core aim is to promote improved governance of regional ecosystem services. The objectives of the project are to promote the measurement of the costs and benefits of ecosystem services derived from land use; support the horizontal integration of ecosystem concerns into sectoral policies and plans at regional and/or national level; explore innovative financial and marketing mechanisms for payment for ecosystem services, and; improve landscape governance for economic and environmental sustainability. Peatlands have been identified by the project as key landscapes which can benefit from this initiative. The Peatlands Strategy Implementation Group may be interested in monitoring this project which will form the basis of a Regional Action Plan for improved governance for ecosystem services in the Eastern and Midland Region.</p>
<p><b>F</b></p> <p>The Department of the Environment, Climate Action and Communications and the Department of Housing, Local Government and Heritage, with assistance from Bord na Móna, will conduct an assessment of the overall ownership status of cutaway peatlands</p>	<p>It is the view of the Assembly that this assessment would ideally feed into and/or be informed by the Territorial Just Transition Plan for Ireland which is also currently under development by the Department of Communications Climate Action and Environment. This highlights the importance of</p>

<p>(including blanket bog) throughout the country, with a focus on determining the proportion in public and private hands.</p> <p>This information will be essential for <b><i>identifying appropriate future uses for this land and harnessing its potential</i></b>. Consideration will be given to publication of a report in line with data protection legislation. This Action is scheduled for completion in Q4 2022.</p>	<p>timing and policy alignment, both in terms of changes to the Actions set out in the National Peatlands Strategy and successor Strategies.</p> <p>In terms of identifying appropriate future uses, the RSES identifies the diversification and growth of smart specialisation of local economies with a strong focus on clustering as a key growth enabler for the Midlands region. This includes sustainable farming and food production, tourism, energy and renewables, bioeconomy and circular economy, with a focus on publicly owned peatlands in the Midlands, to support a 'Just Transition' and realise the benefits of green technologies.</p> <p>RSES RPO 4.84 is to support the rural economy and initiatives in relation to diversification, agribusiness, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer-term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive after-use framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.</p> <p>EMRA RSES RPO 7.29 is to support collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as the Bord na Móna Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable</p>
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	<p>Peatlands habitats. The national Peatlands Strategy would fall under “any relevant policies and strategies” in this RPO.</p> <p>EMRA RPO 7.17 is to facilitate cross boundary co-ordination between local authorities and the relevant agencies in the Region to provide clear governance arrangements and coordination mechanisms to support the development of ecological networks and enhanced connectivity between protected sites whilst also addressing the need for management of alien invasive species and the conservation of native species.</p> <p>The National Peatlands Strategy is a key framework in relation to the implementation of these RPOs given its strategic aim to provide a long-term framework within which all of the peatlands within the State can be managed responsibly in order to optimise their social, environmental and economic contribution to the well-being of this and future generations.</p>
<p><b>G</b></p> <p>Bord na Móna, in conjunction with the Department of Agriculture, Food and the Marine, will continue its trials of Sphagnum moss cultivation and initiate trials of other paludiculture techniques and report on the outcomes. Consideration will be given to publication of the results, subject to commercial sensitivity.</p>	<p>The <b>Interreg North-West Europe Care-Peat project</b> explores mechanisms to reduce carbon emissions and restore the carbon storage capacity of European peatlands. Diverse Irish partners are involved, including NUIG (Irish lead), EMRA, Bord na Móna, NPWS, Community Wetlands Forum and Irish Peatlands Conservation Council. Linked with Priority Action G, Care Peat aims to create new economic models that are advantageous to all stakeholders looking at the potentials of carbon credits and sphagnum farming for example to try and find a green solution that will also enhance income for landowners. The project supports collaboration between local authorities, the Bord na Móna Transition Team and relevant stakeholders.</p>

<p><b>M</b></p> <p>The existing legal framework relating to the regulation of peat extraction in terms of planning, environmental protection and habitats protection will be reviewed and recommendations developed to bring about a clearer, proportionate and enforceable system</p>	<p>EMRA welcomes this review and would engage with any relevant consultations or processes.</p>
<p>of regulation that also ensures compliance with appropriate EU environmental legislation, including Appropriate Assessment and Environmental Impact Assessment to ensure best practice in peat extraction operations. This Action is scheduled for completion in Q4 2021.</p>	
<p><b>O</b></p> <p>The Peatlands Strategy Implementation Group will support the work of the National Land Cover and Habitat Working Group (chaired by the National Parks and Wildlife Service/Department of Housing, Local Government and Heritage) and joint initiatives by Ordnance Survey Ireland and the Environmental Protection Agency to develop mapping and geospatial data for land use planning and development management in relation to all peatland types and will assess the potential application of its report (expected in 2021) as a resource for peatlands policy, research and actions. This Action is scheduled for completion in Q4 2021.</p>	<p>In addition to the aforementioned need for strategic land use guidance for harvested peatlands, EMRA notes the need for better mapping and geospatial data for land use planning and development management in relation to all peatland types. Given the central role of local government in planning and development management, EMRA recommends close consultation with planning authorities and the regional assemblies in assessing and structuring the potential application of the report.</p>
<p><b>P</b></p> <p>The Department of Housing, Local Government and Heritage, in consultation with the members of the National Appropriate Assessment Forum, will complete the ongoing plans for updated Appropriate Assessment guidance and publish them in 2021. This Action is scheduled for completion in Q4 2021.</p>	<p>EMRA is a member of the National Appropriate Assessment Forum and looks forward to the publication of the updated Appropriate Assessment guidance later this year.</p>

<p><b>Q</b></p> <p>The Department of Housing, Local Government and Heritage will publish revised planning guidelines in relation to wind energy development, which will include an Annex in relation to peatlands. This Action is scheduled for completion in Q1 2021.</p>	<p>EMRA looks forward to the publication of revised planning guidelines in relation to wind energy development, which will include an Annex in relation to peatlands. EMRA would also welcome similar guidance for wider ranging renewable energy sources (solar and biomass) and its inclusion in strategic land use guidance for degraded wetlands and peatlands. We recommend that the reviewed National Peatlands Strategy fully considers the potential impact of the solar as a renewable energy sources on biodiversity, landscape and heritage as regards rewetted peatlands and incorporates appropriate actions.</p>
<p><b>S</b></p> <p>The Department of Housing, Local Government and Heritage will conduct a feasibility study on the creation of a national peatlands/wetlands park to be published in 2021.</p>	<p>RPO 7.19 of the EMRA RSES is to support the consideration of designating a National Park for the peatlands area in the Midlands. The Assembly therefore welcomes this feasibility study.</p> <p>As outlined in the RSES, the Lough Boora Discovery Park in Co Offaly is a Bord na Móna cutaway bog, which has been developed as an outdoor amenity area with restored wetland and woodland habitats. There is potential to develop a regional peatway connecting natural and cultural attractions and the Mesolithic (Iron age) bog trails and to develop a National Park based on the raised bog peatlands of the Midlands area.</p> <p>Furthermore, RSES RPO 4.68 is to support Tullamore's role as a tourism hub and development as a Tourism Destination Town having regard to its accessibility to key tourist destinations, natural amenities and recreational opportunities including the Grand Canal Greenways, Lough Boora Discovery Park, Slieve Bloom Mountains and peatlands. EMRA would engage with any relevant consultations or processes related to this feasibility study.</p>

<p><b>T</b></p> <p>Current and future peatlands research project results from the Environmental Protection Agency and other organisations will, where appropriate, be taken on board by the Peatlands Strategy Implementation Group, disseminated to group members, and used to assist in future policy development as appropriate.</p>	<p>EMRA would welcome the ongoing funding of research which can inform and contribute to the implementation of the RSES guiding principles for the consideration of development on peatland areas (outlined above).</p>
<p><b>U</b></p> <p>With the assistance of the Peatlands Strategy Implementation Group, the Department of Housing, Local Government and Heritage will coordinate the actions in the 2020 Programme for Government regarding peatlands to maximise the benefits for biodiversity.</p>	<p>EMRA welcomes this review and would engage with any relevant consultations or processes.</p>

### **The Eastern & Midland Regional Assembly and the Just Transition**

Since the making of the RSES in June 2019 – and the National Peatlands Strategy in 2015 - the ‘Just Transition’ has grown as a key European, national and regional policy priority. The acceleration of the decarbonisation process in the Midlands has emphasised the need for effective implementation of relevant RSES RPOs and ongoing engagement with related policy and plan development. This submission to the mid-term review process of the National Peatlands Strategy forms part of this ongoing engagement.

In relation to the Just Transition process, EMRA has engaged closely with Local Authorities in the Midlands, the Midlands Regional Transition Team (MRTT) the Just Transition Unit of the Department of Communications, Climate Action and Environment (DCCAE), the National Economic and Social Council (NESC) and the Office of the Just Transition Commissioner. EMRA is also informing the Just Transition process at the European level through consultations with the Department of Public Expenditure and Reform (DPER), in line with Regional Strategic Objectives defined in the RSES. Through enhanced and widespread engagement, EMRA has established itself as a key national and regional stakeholder in the Just Transition process. EMRA is now a formal member of the MRTT and is a key national stakeholder informing the development of the national Territorial Just Transition Plan (TJTP) that is required in the context of the European Just Transition Fund (EU JTF). Given our ongoing commitment to the Just Transition process and its particular relevance to the Midlands Region, it is expected that EMRA will play a key role in governance of the EU JTF as will be set out in the national Territorial Just Transition Plan (TJTP).

### **Conclusion**

The Regional Assembly welcomes the opportunity to further engage in the mid-term review process for the National Peatlands Strategy and the executive looks forward to continuing engagement with the National Parks & Wildlife Service.



Regards,

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[REDACTED]

Director

Eastern and Midland Regional Assembly

17<sup>th</sup> June 2021



## Irish Peatland Conservation Council

Cómhaithe Chraobhnaithe Phortaigh na hÉireann

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National Peatlands Strategy Mid-Term Review

29th June 2021

Peatland Issues and Land Designation Section

National Parks and Wildlife Service

Department of Housing, Local Government and Heritage 90 King Street North

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[NPSreview@housing.gov.ie](mailto:NPSreview@housing.gov.ie)

### RE: National Peatland Strategy Mid-Term Review 2021

Dear Peatland Issues and Land Designation Section,

The Irish Peatland Conservation Council are an environmental non-governmental-organisation and registered charity (CHY6829, RCN20013547) that has campaigned for the conservation of a representative sample of Irish peatland for present and future generations for over 38 years. Our work involves the purchase and protection of peatland nature reserves for wildlife and habitat conservation, promoting environmental awareness and peatland publicity, conducting research into the restoration of peatlands and providing educational resources for schools and groups.

The Irish Peatland Conservation Council welcome this review and following the published document's layout we have made comments on the Actions included below.

#### Introductory Context

The National Peatland Strategy is predominantly focused on raised bog, yet, blanket bogs and fens should be given equal priority as raised bog is not the only peatland type present in Ireland. Transition Mire, an ANNEX I peatland habitat is not even mentioned in the strategy, highlighting that the NPS is not wide-ranging enough and under-representing all the peatland habitats in Ireland. This is reason in itself to call for a reworking of the plan to include new priority actions (which are described within the 2019 report on the status of EU Habitats & Species) for these peatland habitat types.

#### What Has Changed Since the Publication of the Strategy?

In September of 2019 the Irish Government declared a Climate and Biodiversity Emergency stressing and setting into law that the Citizen's Assembly must explore how the State can address climate change mitigation and biodiversity loss. In light of this The Climate Action & Low Carbon Development (Amendment) Bill 2021 will support Ireland's transition to Net Zero Emissions by 2050, please include this within the review.

The Fen Special Area of Conservation Pilot Management Project needs to be included as this is now completed. The Habitats of Cutover Raised Bog (IWM128) is a published report on the development of a new vegetational classification system which can be used when identifying important habitats in

terms of biodiversity on cutover peatlands, please include the publication of this Irish Wildlife Manual within the review.

The Peat in the Horticultural Industry Review which was published in 2020 on the back of public stakeholder consultation should be included here as well as the interim and final report developed as a part of the Peat in the Horticultural Industry Working Group.

IPCC are also aware that the NPWS have been studying the effects of grazing on blanket bog to ascertain the correct stocking rates which are compatible with conservation and biodiversity protection, this report should be published to allow stakeholders to correctly manage blanket bog/upland habitats.

### **Implementation of Prioritised Actions 2021-2025**

**Action B** To ensure that best practice regarding appropriate land management for peatland is upheld it should be made clear that there are to be significant changes occurring due to the Common Agricultural Policy legislation coming into effect in 2023. Please integrate the new policies into best management practices in order to ensure land managers and stakeholders are not using methods to the detriment of conservation, biodiversity and climate change mitigation.

**Action D** As a matter of urgency forestry on peat soils needs to be addressed. Forestry and peatlands are not on equal footing. It is possible to collect carbon credits for afforestation of peat soils which has a negative impact in terms of biodiversity and climate change mitigation and works against the other policies established and documented within this plan.

**Action G** The data relating to *Sphagnum* cultivation trials should be made available to the Peat use in the Horticultural Industry Working Group to aid the industry in finding suitable sustainable alternative materials and promoting this type of restoration.

**Action I** If the Fen Special Area of Conservation Project is completed the results should be published. The Irish Peatland Conservation Council are concerned as one site is not enough to ground truth the national fen survey. There are six types of fens present in Ireland and they can all be affected by different forms of groundwater influence. IPCC are also concerned that Transition Mire is not included in the Strategy despite being an ANNEX I Habitat.

**Action J** There are 9 Raised Bog SAC's which are missing from the Raised Bog SAC Management Plan and this is a reason for its review and this should be documented. Bord na Móna also have sites lined for designation which would feed into the national target for active raised bog and this also needs to be expedited and documented within this action.

**Action K** Research has been undertaken by NPWS since 2017 in relation to the effects of turf cutting on blanket bogs and the results of this should be published so as to allow the EU LIFE Project to act on this.

**Action L** We are currently at the end of Q2 2021 and the reconfiguration of the Raised Bog NHA Network has not been published. IPCC are aware of sites currently designated yet their status is being ignored (e.g Derrymore Bog NHA, Co. Leitrim). Peat extraction is destroying the site while the designation status is in question. Effective management of the raised bog network is not possible when sites are in legal limbo.

**Action M** Peat extraction of all scales also need to be brought into the regulatory system, including turbary where there is no onus on the developer to ensure drainage and extraction is sensitive to Ireland's management of emissions to waterways/air and biodiversity protection. Once recommendations are developed (Q4 2021) they need to be published so as to alert the public to the regulations surrounding peat extraction.

**Action N** Knowing the environmental damage this machine causes legislation needs to be brought forward to make use of the Difco "sausage" machine illegal. As there is no evidence that this machine is "not" being used the extent and impact research should not only focus on blanket bogs but also take into account the impacts this type of cutting has on raised bog. It is possible to still purchase this type of machine (they are still advertised for sale) which means it could be used in the future and this needs to be monitored. We have had reports in 2021 (non-verified) of the sausage machine being used on Jamestown Bog NHA, Co Meath.

**Action Q** The Wind Energy Guidelines have not yet been published yet the proposed timeframe for completion has been set for Q1. We are at the end of Q2 for 2021. Please be more specific about the type of peatland this Action includes e.g. designated only or all peatland? Which peatland types are to be Annexed within the wind energy guidelines?

**Action R** The Peatlands Council needs to take more action regarding education in liaison with the Department of Education and Local Authorities. New educational materials need to be produced and current climate change policy documents have few real educational goals.

**Action S** There is the potential for a National Park within the Midland Counties as there is a gap in the geographical range of state managed parks. Please work with local groups that have proposed a peatland park or other peatland amenity to forward the feasibility study and consider the potential to link these groups or sites together within a wider proposed peatland park which could have nature and conservation benefits in terms of developing ecological corridors between them.

**Action U** While reviewing the Actions within the National Peatlands Strategy Mid-Term-Review we understand that some Actions have been deprived of being included. The Irish Peatland Conservation Council raised concerns in 2014 that climate and biodiversity were not addressed in the National Peatland Strategy. As our circumstances have now changed with the Irish Government declaring a Climate and Biodiversity Emergency and as this review has set a precedent with the inclusion of a new Action focusing on biodiversity there needs to be new actions included which also focuses on climate change mitigation.

#### Actions Closed and/or moved to Monitoring

**Action 13** IPCC ask is 4 sites enough to sufficiently monitor the emissions from the range of cutover types present in Ireland? Cutover peatland can be highly varied with different vegetational outcomes. All the different types of peatland need to be monitored so we can attribute the correct emission factors when accounting for landscape management. This Action should be left open amended to include the full spectrum of peatland conditions.

**Action 18** Currently restoration is directed towards state-owned land only and this needs to be widened to include degraded peatland outside of state ownership if Ireland is to be serious about reversing biodiversity loss and climate change mitigation. This Action should be left open. A collaborative approach is necessary as IPCC have estimated that 27% of peatland within the Republic

is currently used for turbary but could become effective supporting habitat if more incentives for restoration or rewetting were introduced and promoted.

**Action 30** IPCC appreciate the work done by NPWS in regards to development of amenity on the LIFE sites but this action is still very relevant given that many sites have come out of production and benefitting from the enhanced rehabilitation (Peatland Climate Action Scheme). This Action needs to be left open and sites not covered by NHA/SAC designation should be incorporated so these can be managed in terms of amenity going forward.

### Conclusion

The Irish Peatland Conservation Council have consistently reported that the Strategy is weak in terms of climate change Actions and this has not yet been addressed. A precedent has been set with the inclusion of an Action not explicitly set out in the original National Peatland Strategy (U in the review) which is to address the lack of biodiversity focus in the original plan. New Actions should also be included which focuses on climate action as the plan is lacking in the area of climate change mitigation. It is also evident that the Strategy is very ambitious regarding the timeline of when the Actions are to be completed with many Actions already behind schedule. We also find that the Strategy is not covering enough peatland outside of state ownership which is leaving a significant portion of peatland unmanaged and contributing to climate change. This coupled with the unregulated effects of turbary are hindering effective peatland biodiversity recovery and climate change mitigation.

Your Sincerely,

██████████ - IPCC - Conservation, Policy & Fundraising Officer

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30<sup>th</sup> June 2021

Our Ref: EPAC 2621

**Re:** National Peatlands Strategy Mid-Term Review

Dear NPS Review Team,

We welcome the opportunity to provide further observations on the Mid Term Review of the National Peatlands Strategy (the Strategy).

Overall the prioritised actions are ambitious, and we welcome the commitments in the existing and updated Actions.

Currently, many of our peatlands, including those protected under national and European legislation, are in an unfavourable state, however, restored, they could play a key role as carbon sinks and provide space for nature. Restoration and rehabilitation of cut-over and cut-away bogs will also deliver significant water quality improvements.

Peatlands provide many important ecosystem services, including maintaining biodiversity, carbon storage, supporting agriculture and forestry, water regulation and flood attenuation. Intact peatlands play an important role in sequestering and storing CO<sub>2</sub> from the atmosphere. If, however, they are degraded or dried out, peatlands become oxidised, which leads to CO<sub>2</sub> being released into

the atmosphere. This highlights the importance of implementing on a priority basis the restoration and management commitments set out in the Peatlands Strategy.

Ireland's Climate Action Plan 2019 (Government of Ireland, 2019) includes actions to implement peatland conservation measures. The Climate Action Plan provides an opportunity to leverage a concerted effort to fully implement the commitments of the strategies and plans to protect and restore peatlands. It aims to restore 22,107 hectares of raised bog habitat to directly reduce or halt carbon loss and is due for delivery by 2035. The Interim Climate Action Plan should also be consulted

(<https://www.gov.ie/en/publication/55fde-climate-action-importantpublications/#climate-action-plans>).

Ireland must continue the transition from peat to using cleaner, more renewable sources of fuel. Nationally, there needs to be a concerted effort to fully implement the commitments of the National Peatlands Strategy and the National Raised Bog SAC Management Plan 2017-2022 (DCHG, 2018). Rewetting degraded peatlands will help eliminate and reduce losses of carbon. Where unauthorised peat extraction activities are identified, these should cease.

### **Action Tracking**

To avoid confusion, the Actions should be allocated the same Action number assigned in the Peatlands Strategy 2015. Having different numbers/ letters /assigned will lead to confusion in ongoing implementation. Where changes to actions are proposed, these could be highlighted and where additional actions proposed, these should continue from Action 32 in the Strategy.

### **Duration of the Strategy**

It is not clear what the lifetime of the Strategy is. This should be clarified in the title of the Strategy and a formal review undertaken at a minimum at five yearly intervals.

### **Implementation Plan**

An Implementation Plan with more detail on the timescales and the approach to fulfilling the actions along with lead responsible body(ies) will be important to drive implementation and to monitor progress. There would be merits in reviewing the Plan on an annual basis and a report on progress prepared.

Every 5 years a more detailed review should be undertaken. This would be informed by the annual reviews. Any updates and/or modifications to the Strategy should at a minimum be screened for SEA and Appropriate Assessment.

### **Resources**

It will be important to ensure adequate resources are allocated to progress the various Actions in the Strategy within the specified timescales.

## Peatlands Conference

There would be merit in considering committing to convening a Peatlands conference during the next Strategy implementation period. The focus of the conference could be on highlighting progress on key Strategy Actions and explore any emerging issues. This should include progress on restoration, management and relevant research projects. A particular emphasis should be placed on case studies of restoration/rehabilitation projects.

## SEA and Appropriate Assessment

Changes to the Strategy on foot of this Mid-term Review and subsequent reviews should be screened for the purpose of SEA and Appropriate Assessment.

"Our soils and land need to become net sinks for capturing and storing carbon dioxide. The facilitation of further carbon storage will require widespread rehabilitation and protection of peatlands, increased levels of forestry and woodland, and changes to land management practices.

Where land management is providing a store for carbon, this should be maintained or enhanced. Where land management is resulting in emissions of carbon dioxide, this source should be reduced or eliminated, and where land is degraded or has lost its ability to absorb or store carbon dioxide it should be restored. Nationally, there needs to be a concerted effort to fully implement the commitments of the strategies and plans to protect and restore peatlands." (Ireland's Environment, 2020).

## Ireland's Environment: An Integrated Assessment 2020 – Peatlands related Text

Relevant peatlands related sections in the 2020 SOE report can be found in the Land and Soil Chapter, pages 110-113 and in the Chapter Highlights, page 123 here: [Land and Soil](#) The relevant text should be taken into account when finalising the Mid Term Review. Key messages for the 2020 state of environment report can be found in pages 432-433, in Chapter 16: [Ireland's Environment Key Messages](#) The relevant aspects of the Ireland's Environment should be taken into account in finalising the Strategy review.

The Agency is committed to its continued participation in the Peatlands Strategy Implementation Group and will endeavour to assist, where feasible and appropriate, in the delivery of specific and relevant Strategy actions.

If you have any queries or need further information in relation to this submission, please contact the undersigned. I would be grateful if you could send an email confirming receipt of this submission to: [sea@epa.ie](mailto:sea@epa.ie).

Yours Sincerely,

---



Senior Scientific Officer

Office of Evidence and Assessment

Environmental Protection Agency



Regional Office

Inniscarra, County Cork

## **Appendix I**

### Specific Comments on Strategy Actions

#### **ACTION D - Afforested Peat Areas**

This action commits to creating guidance and criteria for the identification and appropriate future management, of peat areas currently afforested. Consideration should be given to including specific reference to peatland restoration in this Action.

#### **ACTION F - Blanket Bogs**

Consideration should be given to the preparation of a Blanket Bog SAC Management Plan within the 2021-2025 time period. This plan should be subject to SEA and Appropriate Assessment. In addition, a review of Blanket Bogs proposed NHAs should be undertaken.

#### **ACTION H - Vulnerability of Peatland ecosystems**

EPA is funding this project - 2020-CCRP-MS.70: Irish Peatland Resilience to changing climate and increased frequency and severity of drought. The project commenced 01/03/2021.

#### **ACTION I – Fen SAC Pilot Management Plan**

We note the reference to the follow-on actions and recommendations from the Fen SAC pilot conservation management project being implemented by the OPW in cooperation with DHLGH. Consideration should be given to outlining the key elements of the pilot project to be implemented.

#### **ACTION J - National Raised Bog SAC Management Plan 2017 -2022**

The Raised Bog SAC Management Plan extends upto 2022. The Plan should be reviewed and updated for the period beyond 2022. The Plan should be screened with respect to SEA and AA.

#### **ACTION K - Blanket Bog SACS**

A new action should be included requiring a "Blanket Bog SAC Management Plan" to be prepared. This should be subject to SEA and AA. A parallel exercise should review the Raised Bogs proposed NHA network.

#### **ACTION M- Legal Framework**

A review of the legal framework for peat extraction is needed to resolve the many related issues. This Action should be prioritised with a view to ensuring best practice in peat extraction activities.

## **Appendix II**

National Peatlands Strategy Actions Closed Actions or Moved to Monitoring,

#### **ACTION 13- Eddy Covariance towers**

In addition to the 2 Eddy Covariance towers already installed, BNM are also installing additional towers. Together this network will inform the efficacy of the rehabilitation measures employed under both enhanced and standard rehabilitation of cutaway bogs with regard to carbon emission/carbon capture/ sequestration.

#### **ACTION 25/ 26- WFD/ Designated Habitat**

The use of the term "will be kept in mind" should be replaced with a more definitive commitment to implementing the commitments in Action 25/26 in relation to the environmental objectives of WFD, associated Daughter Directives and WFD protected areas.

National Peatlands Strategy Mid-Term Review  
Peatland Issues and Land Designation Section  
National Parks and Wildlife Service  
Department of Housing, Local Government and Heritage  
90 King Street North  
Smithfield  
Dublin 7 D07 N7 CV  
[NPSreview@housing.gov.ie](mailto:NPSreview@housing.gov.ie)

**Re: National Peatland Strategy – Mid-term Review**

29<sup>th</sup> June 2021

To whom it may concern,

I present below for your consideration a response to the Mid-term review of the National Peatlands Strategy (2015–2025). This document is presented on behalf of the community groups and ordinary members of the Community Wetlands Forum (CWF), a special interest group of Irish Rural Link. Further details on the CWF and RL can be found at the bottom of this document.

As an organization which supports 25+ community wetland groups across Ireland, the CWF can offer valuable insights into the progress of the National Peatland Strategy and should be seen as an important stakeholder. Following review of this document from the perspective of the CWF, we have the following important points, which we offer for consideration. For clarity and brevity, our responses are in bullet form but additional information and insight can be communicated on request.

First, it is heartening to see such a comprehensive review process being conducted on this Strategy, combined with the reviews in 2017 and 2018/19 and many thanks for providing the opportunity to comment. Although good progress has clearly been made, we are however appreciative of the recognition that *“progress in the implementation of some actions has been slow.”*

- It is heartening to see the changes in policies and plans which have positively modified the outlook of peatlands in Ireland. It can be argued, however, that the majority of these changes have occurred independent to, and not as a result of, the Peatland Strategy. Although they are mutually supportive, they also highlight the often-disparate strategy for peatlands in general, with numerous plans and targets in place but with an absence of broad-reaching multi-sectoral prioritisation and common purpose. We propose that a **landscape-scale redesign** of peatland protection, rehabilitation and wise-use is adopted.
- In support of the above landscape-scale strategy, an appropriate **blended finance model** is required to provide ‘resilience through diversity’ in funding sources and ensure that economic incentives are provided for communities who have either lost out on the cessation

of peat mining, or continue to forgo the immediate benefits of draining wetlands, overgrazing uplands or cutting turf in an illegal manner.

- As in other similar Action Plans (cf. National Biodiversity Action Plan) the targets of the National Peatlands Strategy are currently **not SMART**: Specific, Measurable, Achievable, Realistic and Time-bound. As a consequence, it is difficult to gauge the success or effectiveness of measures, while numerous targets are either subsumed into other plans, or rolled over to subsequent plans. We would thus welcome further information on the nature of the newly proposed *Implementation Plan*, as an additional Plan/Strategy is not something peatlands will benefit from, but rather SMART action now.
- We greatly welcome the proposition of **Prioritised Actions**, associated lead bodies and an Implementation Group providing oversight. This level of decentralisation provides the mainstreaming called-for in the NBAP and EU Biodiversity Strategy and should improve legitimacy in departments not ordinarily accustomed to such responsibilities. However, we would welcome a significantly increased presence of the Dept. Finance and Dept. of Public Expenditure and Reform in some of these actions and a much greater role of Dept. Agriculture, Food and the Marine, which currently has responsibility for only two actions (B and D). Given the important interaction between peatlands and surrounding farming communities, and the level of spending on biodiversity currently made by DAFM, it is increasingly important to encourage responsibility outside of DHLGH. This serves to address the significant natural capital lying in the wider countryside, outside of the Natura2000 network and beyond statutory obligations.
- With reference to specific Prioritised Actions, we have the following comments:
  - B:** It is encouraging to see the promotion of a Prescribe Code of Burning Practice, but there is no mention of an associated enforcement regime. As seen with illegal peat mining, legal action and prosecution is extremely rare, which does little to discourage illegal activity. Clear referral to this as ‘wildlife crime’ would be an important first step.
  - C:** Addressing the horticultural industry is important, but it is also important to apply pressure on the private sector, possibly through tax incentives, penalties or statutory nonfinancial reporting. International exporters should also be captured in this. Further, public sector procurement protocols should completely ban the use of peat for public purposes, in public works schemes and maintenance.
  - D:** It is encouraging to see the attention paid to afforestation on peat soils. Greater engagement with Coillte is required here though. The adoption of a Forest Code by DAFM, and linking this to an eventual Peatland Code would be an important step. Independent efforts by Coillte (Nature) of late should be supported and encouraged by concomitant action from government.
  - E:** As acknowledged, there are numerous existing or developing programmes benefitting peatlands in Ireland, across various sectors and interest groups. The Peatland Strategy Implementation Group should adopt a greater guidance and national strategy role in combining these efforts and provide a node for communication between projects. **F:** It is encouraging to see this focus on establishing ownership status of cutaway. Use should be made of remote sensing (satellite / aerial imagery) in this, which can also be used through

ground-truthing for emission factor assessment baselines for potential future carbon / water credits.

**G:** The “commercial sensitivity” of sphagnum trials can surely be seen as the common good, and the single stakeholder of Bord na Móna (i.e. the Minister) can direct this to be used as such.

**K:** Much greater clarity is required on the “strategies” to be “considered” within LIFE-IP WAN, how this will tangibly address turf cutting on blanket bog in SACs.

**L:** An update, as part of this Mid-term review, would have been welcome on progress of the formal designation of NHAs.

**N:** Similar to previous comments on LIFE-IP WAN more clarity is required on how the Difco cutter will be “assessed” and what the purpose of this would be, whether behaviour change, regulation or banning its use entirely. Closer collaboration with DAFM should be encouraged in this regard.

**Q:** Wind energy guidelines are encouraging, though we would welcome DECC leading this task as opposed to DHLGH. Consideration of BirdWatch Ireland’s Wind Energy Sensitivity Mapping project is advised, as well as public involvement ‘often and early’, aside from cursory ‘consultation’ which, owing to pandemic restrictions have become much less equitable and representative. Interactions of the CWF with some wind energy corporate bodies have revealed the worrying perception that wind energy installations are ‘beneficial to peatlands’, revealing a concerning paucity of understanding.

**S:** Although a peatlands/wetlands park would give greater meaning to otherwise dispersed protected areas, DHLGH must be better cognisant of the numerous other independent considerations around this already in train, including for UNESCO status. This reveals, as highlighted before, the somewhat disparate and disconnected operation of the many worthwhile projects focussing on peatlands.

- Much greater focus on **amenity provision** is required in the Plan, as a means of instilling local vested interests (and therefore protection) in these important areas. Action Ref. 30 simply states that this “*does not require a specific action at this time*”. Consultation with communities surrounding these bogs would yield a substantially different opinion on this, especially in light of pandemic restrictions and the significantly increased demand for natural outdoor amenity. This mirrors its lack of inclusion in the plans of Bord na Móna and their PCAS project, whereby no provision is made of amenity. Aside from the substantial wellness benefits of this, public acceptance of significant works and changes to rural socioeconomies would be a clear benefit of such explicit consideration.
- It is disheartening to see the absence of appropriate reference and connectivity to the **Just Transition** programme of rural socioeconomic supports. As has been witnessed since the cessation of commercial peat extraction and the increasing restrictions on domestic and turbary extraction, public opinion and support for climate and biodiversity responds strongly to the disproportionate effect being felt by rural communities in terms of job security, fuel affordability, and alternative economic activities. A collective approach to wetlands can contribute to a diversified and resilient rural economic system, including paludiculture and

carbon farming (and possible CAP payments associated with both) and by incubating innovation at community-level through empowered community groups who are provided with the capacity and skills to adapt. Irish Rural Link and the CWF continue to provide this.

- Rural values and **effective community engagement**, including co-design and coimplementation are not mentioned here at all. The importance of continued engagement (early and often) aimed at community integration should be strengthened. This is fundamental to forwarding the priority areas listed in this report. The grassroots role of communities in conserving and restoring peatlands is not adequately acknowledged. At present, conservation of peatlands is largely framed from a top-down policy and governance perspective and does adequately include a bottom-up community-based natural resource management (CBNRM) model.
- A '**landscape level**' treatment should be considered, following existing protocols and experience adopted by organisations such as the Landscape Finance Lab, Gold Standard or Verra, which consider the holistic socio-ecological systems at play and the blended finance solutions to sustain long-term climate and biodiversity action. Associated with this, this Plan should consider the development of an **all-island Peatland Code**, modelled on the best-practice shown by existing schemes; e.g. MoorFutures in Germany or the UK Peatland Code.
- Although difficult to envisage and establish on a suitable regulatory basis given Brexit, the **consideration of the peatlands of this island as a single entity** should be planned. Already, through recent revisions of our own approach to the Water Framework Directive, the South has revised its former 8 river basin districts into a single coalesced RBMP. As noted recently in the NESC Shared Island report, "the island of Ireland is a single biogeographical unit". In particular for our shared network of wetlands, this all-island reframing should be sought to secure water supply, reduce carbon emissions and avoid socio-political divergence in border regions caused by widely differing approaches to protection, restoration or use.
- In some instances, this mid-term review demonstrates its age, having been largely formulated as a **reaction to turf-cutting and with a focus on protected areas**. Since then, peatlands have been recognized as having significant natural capital value, including carbon storage, water services, biodiversity, amenity and culture, especially in the wider countryside. A truly Just Transition needs to be reflected in a revised peatlands strategy.
- Given the scale of the task at hand, and the requirement of the EU Biodiversity Strategy to protect 30% of Ireland's land area, an **independent agency is required** with the resources, autonomy and capacity to fulfil its aims, especially in light of the substantial areas of peat soils no longer used for mining or forestry. There is thus a lack of urgency to this mid-term review, in reallocating some targets to other strategies, disregarding others, or proposing that a new strategy (Implementation) continue this into the future.
- Finally, it is the view of our community network that **payments for ecosystem services** relating to carbon, which align with national emissions reductions targets and can assist the farming sector in reducing its environmental impact, should be explored in much greater detail. Numerous pilots are currently underway, which require much greater recognition and collective strategy than demonstrated thus far. These include EIP FarmPEAT, LIFE-IP WAN, LIFE-IP Peatlands and People, WaterLANDS, Peatland Finance Ireland, Care-Peat and others. Trialling initiatives to **attribute non-use values** to areas of extant peatland, while further incentivising improved quality and increased extent, should be framed as the direction of travel for a common destination for Ireland's peatlands.

We thank you for affording us the opportunity to comment on this mid-term review and hope that the above comments are of use. If you require clarification on any of the above, please do not hesitate to contact me directly.

Yours sincerely,

(On behalf of the communities and members of the Community Wetlands Forum)

Development Officer  
Community Wetlands Forum

Email: [REDACTED]

Ph: [REDACTED]

## **Community Wetlands Forum**

The Community Wetlands Forum (CWF) is a special interest group of Irish Rural Link representing a network of 25+ community groups with an interest in wetlands.

The CWF was established with the main objective of providing a representative platform for community-led wetland conservation groups based on the principles of community development: Empowerment; Participation; Inclusion, Equality of Opportunity; Selfdetermination; and Partnership.

Membership of CWF is open to community groups involved in wetland conservation, as well as other organisations and individual stakeholders who support the aims and objectives of CWF. The forum is also attended by representatives from Government Agencies and third level institutions.

## **Irish Rural Link**

Irish Rural Link (IRL), formed in 1991, is a national network of organisations and individuals campaigning for sustainable rural development in Ireland and Europe. IRL, a non-profit organisation, has grown significantly since its inception and now directly represents over 600 community groups with a combined membership of 25,000.

The network provides a structure through which rural groups and individuals, representing disadvantaged rural communities, can articulate their common needs and priorities, share their experiences and present their case to policy-makers at local, national and European Level.

Irish Rural Link is the only group represented at the national social partnership talks solely representing rural communities' interests.





## Strategy Mid-Term Review

### Peatland Issues and Land Designation Section

National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
Dublin 7 D07 N7 CV.  
NPSreview@housing.gov.ie

### **Re: National Peatlands Strategy Mid-Term Review 2021**

A Cara,

Thank you for the opportunity to respond to the consultation on the Mid-term review and Lullymore Heritage & Discovery Park CLG are pleased to contribute.

#### **Background Information on Group:**

Lullymore Heritage and Discovery Park CLG is a social enterprise located on a mineral island surrounded by the Bog of Allen in West Kildare. Lullymore is an ancient place which can trace human settlement back to pre-history<sup>5</sup>. It was the site of an Early Christian Monastery for over a thousand years, a refuge and training camp for Rebels in 1798 and in more recent history a centre for industry with the opening of Lullymore Briquette Factory in 1936. The surrounding peatlands offered protection and have shaped the history and culture of our community for millennia.

Lullymore Heritage & Discovery Park was started by a local voluntary committee in 1990. The Group wanted to highlight Lullymore's rich history and the peatlands and saw tourism as a sustainable way to provide a better way of life and employment to local people following job losses in BNM and ESB in the mid to late eighties. The people of the area had been dependent on both companies for full time/seasonal employment for the previous 50 years.

Since 1994 the Park has worked in partnership with state agencies including Pobal, Department of Social Protection, Bord na Móna and the local community to bring tourism to the area, protect and promote the peatlands, preserve local heritage and provide training and sustainable employment. Since the Park was officially opened in 1993, over a thousand people have been employed or received training. The Park is also a key resource in the region providing community supports and

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<sup>5</sup> Results of Geophysical Survey of Lullymore Monastic Site by Kilkenny Archaeology – Coilin O'Driscoll and J.M Leigh Surveys 2015

amenity with a range of visitor experiences such as education on biodiversity and history, as well as leisure and play.

Lullymore Heritage and Discovery Park is key attraction in Irelands Ancient East and an award-winning enterprise (Irish Tourism Industry Association Best Environmental Tourism Innovation Winner 2017) which attracted over 54,000 fee paying visitors in 2019.

Lullymore Heritage and Discovery Park's submission follows.

1. The National Peatlands Strategy 2015 aims to provide a long-term framework within which all the peatlands within the State can be managed responsibly to optimise their social, environmental and economic contribution to the well-being of this and future generations. Following the Bord na Mona announcement on the 24<sup>th</sup> November 2020 ending all peat extraction, we believe there is a once in a lifetime opportunity to deliver on all of the above objectives with landscape scale rehabilitation and support for the creation of a Peatlands National Park. Lullymore Heritage & Discovery Park is a member of a group of environmental and tourism organisations proposing a 7000 hectare Peatlands National Park on the former industrial bogs of Kildare and East Offaly. This Park can be a blueprint for other regional parks and act as a pilot to showcase and demonstrate the potential for biodiversity recovery, climate mitigation, research, education and tourism with audited metrics. It will also be a significant in helping us align to the EU Biodiversity Strategy 2030<sup>6</sup>.
2. Given the huge changes since the original National Peatlands Strategy in 2015, we recommend that the multiple schemes undertaken by Government and its agencies (EIPs, Life, Just Transition and Agri-Environment schemes) are aligned with the Just Transition Fund (JTF) objectives to support tourism development, peatland rehabilitation and the midlands communities impacted by the cessation of peat harvesting.
3. The potential for tourism to the Peatlands needs to be recognised and included in the Prioritised Actions for 2021 – 2025 due to this industry's ability to protect the peatlands and the communities living around them for generations to come. This means working with Failte Ireland and others to identify and support existing, developing and potential tourism sites, community groups and experiences in the Midlands. Tourism to the Midlands has traditionally been performing at a low base when compared with Dublin and Western Counties. The potential for growth and the benefits this would bring are vast for the Irish people and the economy. Tourism and environmental projects such as the proposed Peatlands National Park in Kildare and East Offaly have a population of 2.5 million people residing in the surrounding Counties and are easily accessible for day trips. There's also the potential of nearly

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<sup>6</sup> [https://ec.europa.eu/environment/strategy/biodiversity-strategy-2030/eu-nature-restoration-targets\\_en](https://ec.europa.eu/environment/strategy/biodiversity-strategy-2030/eu-nature-restoration-targets_en)

9.7 million overseas visitors to Ireland in 2019<sup>7</sup>. Large wilderness areas created near to Dublin will offer people an opportunity to escape urban centres, connect with nature and explore the unique wildlife and history of the peatlands. The story of how the Irish people are embracing a new relationship with their peatlands following industrialisation will also resonate with visitors globally.

4. With regard to Action Q of the Mid Term Review which will publish revised planning guideline in relation to wind energy development we would recommend a review of existing plans for major wind turbine developments on peatlands and to look at all renewable options such as EirGrid who have put forward a new vision for the development of renewable energy in Ireland with an increased focus on offshore wind which was not feasible when the National Peatlands Strategy was published in 2015. The landscapes of the Bog of Allen contain vistas with wide and distant horizons and little or no sign of man-made structures. Such wilderness views are rare in modern Europe --- in a lowland context they are probably unique to the Midland bogs. Apart from their intrinsic value, they are a growing attraction to visitors from Ireland and abroad. Wind turbines and their associated infrastructure would severely impact on tourism and the visual integrity of these landscapes.
5. We acknowledge the work already commenced to rehabilitate and restore some of our bogs. Proposals for advanced rehabilitation for fragments of raised bog on lands managed by Bord na Móna are encouraging. However, these isolated “islands” will gradually shrink and their populations of some dependent animals will go extinct if their habitats are not connected through a landscape scale plan for linkage, restoration and repurposing of extracted peatlands.
6. With reference to Actions Closed No. 30 and considering all recent changes we would hope that the consideration of peatlands as an amenity not requiring action be reviewed.
7. With regard to Action Q and the Department’s intention to conduct a feasibility study on the creation of a national peatlands/wetlands park to be published in 2021. We would urge the Department to proceed without delay to complete the study so that the benefits of such an action can start to bear fruit in the period 2021 -2025.

Is mise le meas, [REDACTED]

Manager,

Lullymore Heritage & Discovery Park.

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<sup>7</sup> Fáilte Ireland Tourism Facts 2019 Final March 2021

Lullymore,

Rathangan,

Co. Kildare.

R51 E036.



National Peatlands Strategy Mid-Term Review,  
Peatland Issues and Land Designation Section,  
National Parks and Wildlife Service,  
Department of Housing, Local Government and Heritage,  
90 King Street North,  
Smithfield,  
Dublin 7 D07 N7 CV

Via Email

**Re: Submission by Bord na Móna to the National Peatlands Strategy Mid-Term Review**

To Whom it May Concern:-

This is a short reply to the *National Peatlands Strategy Mid-Term Review* from Bord na Móna. In principle, Bord na Móna supports the general direction of travel, comments and the Implementation of Prioritised Actions detailed in the Review.

**The National Peatlands Strategy**

The National Peatlands Strategy (2015) contained a comprehensive list of actions, necessary to ensure that Ireland's peatlands are preserved, nurtured and become living assets within the communities that live beside them. It sets out a cross-governmental approach to managing issues that relate to peatlands, including compliance with EU environmental law, climate change, forestry, flood control, energy, nature conservation, planning, and agriculture. The Strategy has been developed in partnership between relevant Government Departments/State bodies and key stakeholders through the Peatlands Council.

The strategy recognises that Ireland's peatlands will continue to contribute to a wide variety of human needs and to be put to many uses. It aims to ensure that Ireland's peatlands are sustainably managed so that their benefits can be enjoyed responsibly. It aims to inform appropriate regulatory systems to facilitate good decision making in support of responsible use. It also aims to inform the provision of appropriate incentives, financial supports and disincentives where required. The strategy attempts to strike an appropriate balance between different needs, including local stakeholders like turf-cutters and semi-state bodies such as Bord na Móna.

Bord na Móna is a key stakeholder in the National Peatlands Strategy and the Peatlands Strategy Implementation Group. The strategy recognises the potential for some Bord na Móna sites to be restored and to contribute to the national SAC and NHA network of protected raised bog sites. The strategy also recognises the various different values of cutaway bog and developed six key principles (with Bord na Móna) for the after-use of cutaway bog.

- Bord na Móna will continue to assess and evaluate the potential of the company's land bank, using a land use review system. The assessment will help prepare a set of evidence based management plans for the various areas of peatland. These plans will also inform its cutaway bog rehabilitation.
- The policy of Bord na Móna is not to open up any undrained new bogs for peat production, and have now ceased peat harvesting.
- Lands identified by Bord na Móna as having high biodiversity value and/or priority habitats will be reserved for these purposes as the principal future land use.
- Generally, Bord na Móna cutaway bogs that flood naturally will be permitted to flood unless there is a clear environmental and/or economic case to maintain pumped drainage.
- In deciding on the most appropriate afteruse of cutaway peatlands, consideration shall be given to encouraging, where possible, the return to a natural functioning peatland ecosystem.
- This will require re-wetting of the cutaway peatlands which may lead in time to the restoration of the peatland ecosystem.
- Environmentally, socially and economically viable options should be analysed to plan the future use of industrial cutaway peatlands, in conjunction with limiting factors as outlined in Bord na Móna's Strategic Framework for the Future Use of Peatlands.

## **Bord na Móna**

Since its foundation Bord na Móna has been part of the socio-economic and cultural fabric of the Irish midlands. The company has contributed significantly to economic development and employment and in doing so supporting many communities throughout Ireland.

As a global community we are faced with the challenge posed by climate change and as a society we have acknowledged the need to meet this challenge. In keeping with this, Bord na Móna is committed to decarbonising its business and while we have embarked on this journey some time now, the pace of this transition has increased in recent years and continues to increase at pace. In January 2021, the company announced the cessation of industrial peat extraction across all of its lands. This is a very significant step for Bord na Móna. The impact this transition is having on the communities which we support, and the wider economy and social fabric of the midlands is not lost on us. As we continue this challenging journey we are committed to repurposing and applying our assets, not least our land assets, to support and develop the future environment and local communities and local economies of the midlands.

Central to this sustainable transition is the use of our land bank for a range of beneficial commercial, environmental and social uses such as renewable energy, industrial uses (including but not limited to data centres), biomass cultivation, aquaculture, herb cultivation, ecosystem services and biodiversity

as well as recreation and tourism. In many cases these uses can be co-located thereby providing enhanced benefits to the areas in which such developments are located.

In this context it is important to reflect on the nature and uniqueness of this significant landholding. While somewhat fragmented in geographical spread, much of the company's estate is characterised by large tracts of land. This is a somewhat uncharacteristic feature in the context of Irish landholding and therefore offers unique opportunities for a multitude of uses not readily suited to smaller dispersed landholdings. This, coupled with proximity to the national electricity infrastructure and relative isolation from residential areas, is particularly suited to the development of renewable energy such as windfarms and solar farms and other large-scale energy dependant industrial development. Most of our peatland has been utilised for industrial peat extraction for decades and consequently much of the overlying peat deposits has been cutaway. As we exit peat extraction activities, this cutaway will be stabilised through the implementation of a rehabilitation programme with significant portions of these lands rewilding and supporting biodiversity and other ecosystem services. We believe that it is possible to successfully integrate this emerging biodiverse and amenity rich landscape with other commercial, industrial and employment generating uses.

This is exemplified in the transformation of our Mountlucas property in county Offaly which has changed from a site with a single use (peat harvesting) to one hosting a rich mosaic of complimentary activities. Over the last decade an 84MW windfarm has been developed on the site. The windfarm supplies over 50,000 homes with renewable electricity while providing a sustainable income which in turn supports significant local community investment. With the wind assets occupying a mere 5% of the 1,100 hectare site, this rehabilitated cutaway has helped significantly mitigate carbon emissions and also developed into a rich ecosystem with a range of different habitats for native plants and animal species. The site also provides a new significant public amenity with over 10km of walking/running/cycling tracks for people living in the local communities. In addition, the company has also developed a number of new trial business projects on the site including the first closed loop re-circulation aquaculture facility at this site and another involving the cultivation of high value herbs used in the production of alternative medicines and food supplements.

In 2011 Bord na Móna published its long-term land use strategy, Strategic Framework for the Future use of Peatlands. Much of the strategy outlined in this framework document still holds true and is relevant; however, with the significant and accelerated change that has taken place in the intervening period and with the emergence and identification of new potential future land uses, we have engaged in a review of this framework. We expect to publish a revision of the Strategic Framework in the coming months and it will be made available to all stakeholders.

The Government has recently committed to supporting a Peatlands Climate Action Scheme (PCAS) with Bord na Móna. This scheme will look to use enhanced rehabilitation measures to optimise climate action benefits by developing suitable hydrological conditions for re-wetting and setting sites on a trajectory towards becoming naturally functioning peatland ecosystems. Former production bogs such as Edera, which has deep residual peat, have potential to follow a trajectory towards the development of embryonic Sphagnum-rich communities, which are known to be peat-forming. Other bogs have been cutaway, have very little residual peat and will develop other habitats. Re-wetting to optimise climate action benefits can be integrated and balanced with other land-uses

such as renewable energy development and will deliver significant climate action and ecosystem service benefits. The development of naturally functioning peatland ecosystems will lead in time to the restoration of carbon sequestration potential. This will support the main carbon mitigation land-use and renewable objectives of the National Climate Action Plan and actions and objectives of other national plans such as the National Biodiversity Action Plan 2016-2021, The National SAC Raised Bog Management Plan 2016-2021 and The National River Basin Management Plan 2018-2021 in relation to biodiversity, habitat conservation and water quality.

### **Mid-Term Review**

It is agreed, and as noted in the Review that “[A] number of other significant policies and plans have come into existence since the National Peatlands Strategy was published”. In addition, and following the High Court decision in 2019, Bord na Móna formally announced its decision to cease peat harvesting, as part of its *Brown to Green* strategy.

It is also appreciated that the Review was published prior to the enactment of the Climate Action and Low Carbon Development Act passed by the Oireachtas in June. Flowing from the renewable energy and decarbonisation targets enshrined in the Climate Action and Low Carbon Development Act, and recognised in CAP19 (and its successors) is the need for enhanced levels of onshore renewable energy sources, and the role that onshore wind, including onshore wind on previously worked peatlands, can play in meeting this ambition. It is important that the outputs from this Mid-Term Review call out the broad range of Climate mitigation measures that peatlands can contribute towards. In particular, the outputs of the Review must expressly recognise the synergies and benefits of co-locating renewable energy projects in conjunction, and within suitable areas identified as part of Bord na Móna’s (supported by the Government of Ireland) enhanced decommissioning, rehabilitation and restoration scheme for peatlands (Peatlands Climate Action Scheme – PCAS).

This formal recognition of the nexus between Energy Policy and Peatlands is already contained in Section 5.2.4 of the National Peatlands Strategy, which concludes that “*Cutaway bogs have a number of advantages over other categories of land in terms of potential windfarm development of scale*” and that, at pp33, “*rehabilitation is compatible with wind energy installations.*”

### **What can be achieved the five years of The National Peatlands Strategy?**

A significant amount of progress has already been achieved. For example, Bord na Móna have now restored over 3000 ha of BnM raised bog lands and this will contribute towards Ireland’s biodiversity and nature conservation objectives, and the delivery of the National Raised Bog SAC Management Plan 2017-2022. Bord na Móna have started the implementation of very ambitious enhanced peatland rehabilitation scheme (PCAS) this year to deliver re-wetting at a much greater scale than in the past.

Re-wetting peat is a relatively straight-forward action that can deliver many benefits for ecosystem services, for local landscapes and for local communities. Bord na Móna has now ceased industrial peat extraction and is looking to a future of developing new sustainable businesses and supporting



Just Transition for the midlands. In this regard, Bord na Móna is uniquely positioned as the experts in peatland management to play a key role in delivering on wider national objectives of peatland restoration in support of climate action and biodiversity in particular.

The Lough Boora Discovery Park is an excellent example of how amenity can be integrated successfully with other land-uses. The LBDP now attracts well over 100,000 visitors per year and is a key tourism facility in the midlands. This amenity infrastructure is also becoming very important in the context of health and well-being. As we transition away from peat extraction further significant opportunities to enhance expand and develop an integrated network of greenways across our peatlands will emerge. In some cases, future company commercial and renewable opportunities will first need to be considered but the potential exists to provide links with the broader greenway and blueway network across the country. Our experience to date demonstrates how both Greenway Infrastructure (amenity) and renewable opportunities can co-exist successfully.

In light of the established position within the National Peatland Strategy, and the more recent ratcheting up of Climate Mitigation ambition, it is strongly recommended that the co-location of windfarm and renewable energy developments on suitable rehabilitated (and rehabilitated) peatlands is expressly included in the Implementation of Prioritised Actions 2021-2025. Re-wetting to optimise climate action benefits can be integrated and balanced with other land-uses such as renewable energy development and will deliver significant climate action and ecosystem service benefits.

We look forward to making further progress in relation to the objectives and actions of the National Peatland Strategy. Bord na Móna are also committed to continuing to work with all stakeholders in relation to the actions of the National Peatlands Strategy and other key national plans such as the National Climate Action Plan. In the interim, should you have any need for clarification or require additional information, please do not hesitate to contact me.

For and on behalf of Bord na Móna,

**Bord na Móna**

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Ecology Manager



## **IFA SUBMISSION TO THE MID TERM REVIEW OF THE NATIONAL PEATLAND STRATEGY**

**June 30<sup>th</sup> 2021**

The Irish Farmers Association is Ireland's largest farming organisation with approximately 72,000 members in 947 branches nationwide. We welcome the opportunity to make a submission to the Mid-term review of National Peatlands Strategy. As custodians of the environment and indeed rural Ireland, it is of utmost importance that farmers have an input.

While IFA agrees that there is a need to protect the environment and manage our national peatlands there is also a need to protect farmers who may be affected negatively by changes in peatlands management.

Peatlands and wetlands currently make up a substantial amount of Ireland's land area with peatlands alone accounting for approximately 21% of land area. Much of this land is under agricultural use with an estimated 300,000 acres of permanent grassland on drained, carbon-rich soils.

Regulations on the appropriate wetland and peatland protection will potentially prove a major issue in Ireland where a large share of this land is under agricultural use.

The economic importance of agricultural activity for rural areas with high levels of wetland and peatland cannot be ignored. Any changes in the actions set out in the National Peatlands Strategy must not undermine the present and possible future economic agricultural activity taking place on these soils.

The high level of peatland and wetland soils in Ireland underlines the need for a sensible, flexible and appropriate approach to be taken in the in the design and implementation of the strategy. This approach must minimise the impact on farmers and their farm businesses

A peatland strategy must recognise the economic value of turf and the social / cultural implications it has in rural areas. The Government must have a strategy for further exploitation of the peatlands of Ireland. Also, when bog is cut away, alternative uses must be put in place so that the economic value of the land area is fully developed.

The vast majority of Ireland's peatland is in private ownership, it is vitally important that a future peatland strategy involves wide consultation on all aspects of peatland conservation, preservation and development.

## Peatlands Restoration Projects

It is vital that farmers perspectives are considered and valid concerns are taken into account in the execution of all stages of the Peatlands Restoration Projects on bogs. Communication at a local level is needed to ensure that the impact on surrounding land is minimal and any adverse impacts to farmlands is avoided.

Farmers, whose land neighbours the planned development of the both State owned land and Bord na Mona lands have expressed concerns around the potential impact that peatland rehabilitation may have on their farmland surrounding the developments. Some of the key areas for concern for farmers are but not limited to,

### 1. Flooding

- Farmers who manage the land bordering the peatlands restoration sites depend on established drainage systems to channel water from their land. There is a concern that the rewetting process poses a threat of flooding and waterlogging to privately owned farmland nearby this bog.
- For the farmlands surrounding the development sites a hydrological assessment should be put in place prior to work being carried out in order to gauge the long-term effect rewetting may have on the farmlands implicated. This would help to communicate a clearer assurance to farmers and the local community.
- Infrastructure may need to be provided to alleviate problems that may arise on adjacent farms and if so this must be at no cost to affected farmers.

### 2. Property Value

- There are growing fears that the Bord na Mona Peatlands Restoration projects will have a detrimental effect on property value in these areas. With a higher risk of flooding and health and safety concerns, land may be less appropriate for certain farming systems thus lowering the value of the property. At a time when farmer livelihoods are already extremely vulnerable, an impact on land value would be another blow to farmers with land adjoining the peatland restoration sites.

### 3. Turf Cutting

- Any farmer or landowner who has traditionally cut turf on the fringes of these bogs and have established rights there, must be allowed to continue this practice. People in these situations have expressed fears of potential fuel poverty as they are completely dependent on turf for home heating.

Landowners need reassurance and a guarantee regarding contingency planning for potential future ownership of the designated bogs.

Any new management practices on these bogs must not affect adjoining landowners or have any negative impact on their property in the future.

### **SAC & NHA Bogs**

The designation of peatland as either SAC or NHA has had a very serious socioeconomic effect on farmers and rural dwellers through turf-cutting and other restrictions. All SAC and NHA bogs should be reviewed with a view to de-designating. Where the SAC / NHA status is retained, no further restriction should be imposed and turf-cutting for domestic purposes and small commercial operations must be allowed to continue.

### **Non-Designated Bogs**

All other bogs outside the designated bogs area should have no restrictions imposed. Where turf cutting is currently taking place, it should be allowed to continue.

### **Blanket Bogs**

Due to the vast scale of blanket bogs throughout the country, there must be no restrictions on turf cutting where it is currently taking place.

### **Regulatory Regimes that Govern Peat Extraction**

There must be no further restrictions imposed on turf-cutting as the economic value of Ireland's peatlands must be fully exploited in these harsh economic times.

### **Use of Peat in the Horticultural Industry**

As a major segment of the Irish Horticulture sector relies on peat, particularly the mushroom and ornamental sectors any cessation to the use of peat will have severe negative effects. Producers would either have to close their business or import peat, which would add extra cost to their business. In the current market environment, it would be impossible to retrieve these costs from the market. This would also have adverse knock-on effects for the tillage, poultry and forestry sectors resulting in a considerable blow to the rural economy.

It is unacceptable and hypocritical to ban the use of peat in Ireland while importing it from another EU or third country. In addition, an integral part of government policy in dealing with the issues of climate change is to expand and not to undermine the Irish Horticulture sector. The demise of the horticulture in Ireland, would certainly hinder Ireland in meeting its objectives and obligations relating to air, climate, water, nature and the environment. Producers will either have to close their business or import peat, which will add extra cost to their business.

It is important to put in context, the amount of peat which is extracted for use in the horticulture sector as a percentage of the overall peat area in Ireland.

### **Conclusion**

It is vital that the Economic importance of agricultural activities on peatlands is not ignored and that any future policy around the agricultural use of peatlands must not impose restrictions that could undermine the economic agricultural activity taking place on these soils. Any changes to the

National Peatlands Strategy must not have a negative impact on a farmers present or future income from agricultural activity on these Soils.

The economic value of turf, the social and cultural implications it has in rural areas must not be ignored and where turf cutting is currently taking place, it must be allowed to continue **and** should not be burdened with any further planning restrictions.

