

CONSULTATION

Response Document



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A Review of the Use of Peat in the Horticultural Industry (Department of Culture, Heritage and the Gaeltacht)

20 January 2020

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:

- 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 250 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.

We welcome the opportunity to participate in the consultation on the use of peat in the horticulture industry and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

Comments from CIEEM

General Comments

CIEEM is grateful for the opportunity to comment on the Review. Peatlands are an important part of the Irish environment, and have considerable value for biodiversity, carbon sequestration / storage, and ecosystem services. We support any efforts to reduce peat extraction in Ireland.

Responses to Consultation Questions

A. What are your views on what more could be done to support and enable the switch to peat free horticulture at professional crop production level and consumer level?

Peat has been used for a considerable period of time, and many professional crop producers and consumers base their activities on long-established procedures. Peat-free products are different in composition and chemistry, so practitioners and consumers would have to adjust their procedures, which imposes an element of risk and uncertainty. This prevents a barrier to change, particularly for commercial producers.

To assist with this change, particular emphasis should be placed on research and innovation in peat-free substances. This should be carried out by Teagasc or a similar body, in association with third-level institutions. Clear guidance should be provided for professional crop producers and consumers regarding the most-effective peat-free alternatives, how they differ from peat-based media, and whether alternative procedures are required. Training courses should be provided for commercial producers, and awareness campaigns should be developed for amateur consumers.

It is noted in the Review that *“Peat can be much less costly than its substitutes.”* However, this low cost does not include the environmental cost including the considerable damage that it causes to biodiversity and ecosystem services, or the considerable carbon emissions. In 2010 the Irish government introduced carbon taxes on a range of non-renewable fuels, and the rate of taxation was increased in 2014 and 2020. Horticultural peat is not currently subject to the carbon tax, but we recommend that it should be included on the list of taxable products. This is a form of corrective taxation that would more-accurately represent the true cost of horticultural peat, and would encourage the transition to peat-free products.

B. What are your views on alternatives to the use of peat in the Horticultural Industry (from, for example, the perspective of the professional grower or consumer/amateur gardener)?

Domestic green waste is a viable alternative, and key to a circular economy. It is acknowledged that green waste is variable in composition and chemistry, but this can be managed with greater testing, sorting and blending of green waste in order to provide commercial-grade produce. It should be a key action of the Review to promote a new industry in the processing of domestic green waste, either at a state level or in the private sector.

C. What are your views on whether Ireland should cut back or cease the export of peat for use outside of Ireland even if this would result in job losses in Ireland?

Ireland should cease the export of peat, in order to protect valuable habitat, reduce carbon emissions, and protect ecosystem services. Job losses would be regrettable, but alternative opportunities are available in the processing, sale and export of domestic green waste.

D. Do you consider that a working group should be established to advise on how best to overcome the barriers to reducing peat use in professional horticultural crop production and in the amateur horticultural market?

A working group should indeed be established. The aim of the working group should be to cease the extraction of peat products, and to assist producers / consumers with the transition to peat-free products.

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

Members of the working group should have a high level of expertise in the use of peat in the industry and its wider impacts on biodiversity and carbon sequestration. The working group should include representatives from relevant statutory agencies, NGOs (e.g. Irish Peatland Conservation Council), Teagasc, Bord na Mona, commercial horticulture operations (including horticultural associations / cooperatives), consumer retailers (e.g garden centres), exporters, producers / processors of peat-free products, and other special interest groups.

The key aim is to support producers / consumers in the transition to peat-free products. However, it is important that ecologists, conservationists and other special interest groups are represented on the panel, in order to ensure that due consideration is given to the value of peatlands for biodiversity, carbon emissions and ecosystem services.

F. How do you think that those involved in harvesting peat for horticulture could be compensated for any loss arising from a cessation of this activity (for example, on the basis of the profit loss arising or related to the value in ecosystem services retained/provided)?

Affected practitioners should be supported in efforts to transition to peat-free products. Where possible, existing peat-harvesting facilities could be converted for the processing of peat-free products (e.g. domestic green waste), to prevent job losses.

G. How do you think that those involved in harvesting peat for horticulture could be guided towards alternative activities, for example, developing an environmentally suitable alternative material that could replace peat in professional horticultural crop production?

There is a key role for an agricultural research / advisory body such as Teagasc to assist practitioners in the transition to peat-free products. In particular, alternatives must be subject to scientific analysis, in order to ensure that results are reliable and reproducible. When alternatives have been identified, clear guidance should be provided for producers regarding the changes that would be required to long-established growing procedures.

The introduction of a carbon tax on horticultural peat would more-accurately represent the true cost of horticultural peat, and would encourage the transition to peat-free products.

H. What do you consider the value of peatlands to be to (please score out of 100)?:

Carbon storage	30
Nature conservation	30
The provision of ecosystem services	20
The economy	10
Social and cultural needs	10

	Sum = 100
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I. In your opinion should the use of peat within (i) the amateur horticultural market and (ii) the professional horticultural industry be phased out over the next 3, 5, 10, 15 or 20 years and if so, how should this be done bearing in mind the potential job losses and the difficulties with alternative growing media?

(i) Peat use in the amateur horticultural market should be phased out quickly (e.g. within three years), because there are already a range of peat-free products on sale. Losses from the sale of peat products would be balanced by profits in the sale of peat-free products.

(ii) In recognition of potential job losses in the professional horticultural industry, it may be appropriate to consider a longer phasing-out period, e.g. 5 - 10 years. This should allow time for a period of intensive research activity, the production of guidance, and a period of transition to allow for staff training and adaptation of working procedures.

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

There is considerable support among the public for reductions in greenhouse gas emissions and the protection of biodiversity. At present, amateur consumers may be unaware of the environmental impacts of horticultural peat, so an awareness campaign is required. Amateur consumers should also be encouraged to produce domestic compost.