



National Peatlands Strategy Co-ordination Unit
Peatland Issues and Land Designation Section
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Department of Culture, Heritage and the Gaeltacht
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Sent by email to: peatinhorticulturereview@chg.gov.ie.

31st January 2020

RE: REVIEW OF THE USE OF PEAT IN THE HORTICULTURAL INDUSTRY
To Whom It May Concern,

Introduction

The importance of peatlands with regards to climate action, biodiversity and ecosystem services builds a very strong case for the phasing out of the extraction of peat moss and peat and the restoration of peatlands as soon as possible.

2019 has seen the increased awareness and mobilisation of citizens in Ireland with regards to climate change, Ireland's emissions and the need to take effective policies to reduce them quickly. Intact peatlands (or living bogs) are a key national asset that should be protected as they draw up carbon dioxide from the atmosphere and store vast amounts of carbon accumulated over thousands of years. By contrast, drying up peatlands and peat mining lead to the release of significant amounts of carbon dioxide in the atmosphere (as much as 10% of Ireland's Greenhouse gases). Preserving living bogs and restoring degraded ones are among the most important climate actions that Ireland can take. This science is very clear on this topic and was communicated in 2011 EPA funded Bogland Sustainable Management of Peatlands Ireland¹.

In addition, the protection of peatlands would benefit the unique and intricate web of life present in these environments, thus addressing the biodiversity crisis we are also facing. Also, as outlined in the consultation paper and the National Peatlands Strategy 2015, peatlands offer important ecosystem services that contribute to the well-being and health of people in Ireland.

The consultation document outlines the reliance of the professional horticultural sector on peat products (which are by nature unsustainable resources) and the need to identify viable and environmentally-friendly alternatives. This has been known for many years and builds a strong case to provide a timeline to the sector to ensure that they steer away from peat products as soon as possible. Setting binding targets would be particularly important in the mushroom industry that represents 50% of the output value for the sectors that use peat as an input. Taking into account that Monaghan Mushrooms produces is responsible for 90% of the mushroom production in Ireland, it would be key to engage with this company and incentivize them to play a key role in the research, development and adoption of alternative and environmentally-friendly casing solutions, the potential to recycle such casing and the need to further reduce the use of peat products in the growing medium. The introduction and increase of a carbon tax on peat products sold nationally or exported would steer companies away from using these resources. From a business perspective anyway, it does not make sense to use resources that are limited and could tarnish a company's image and reputation (and revenue) if the public were to understand the environmental damage created by their products.

The consultation document outlines the fact that peat free products are a viable alternative for use by consumers and amateur gardeners. As a result, there is no reason to delay the phasing out of products in this sector. A carbon tax could be similarly introduced and rapidly increased to reflect the damaging environmental impact on peat products and incentivize retailers to stock up peat-free products.

Finally, one has to take into account the impact of the phasing out of peat products on extracting companies in Ireland, jobs and communities. This is particularly important to ensure a just transition for people working in the sector. This reflection is already happening at Bord na Mona with regards to peat extraction as fuel and it would be logical to include all peat mining (be it for fuel or the horticultural sector). Given the environmental impact of the extraction of peat products, it would make sense to identify the companies involved and introduce a licensing system that would include the phasing out of the activity. In addition, the introduction and increase of a carbon tax as previously mentioned would mean that peat-based products would become less attractive and that extracting companies would be incentivized to look for alternatives, such as producing compost from green waste.

To conclude, here are two comments on the report itself. The report contains a few vague ideas on how to move things forward, no target to phase out peat mining for horticulture, no impact assessment of the measures proposed and no timeline for their application. This is unacceptable given the urgency of the climate and biodiversity breakdown and the positive role that peatlands can play with respect to both.

The report and the consultation questions are biased in over-emphasizing the economic impact of phasing peat mining, while providing little evidence for it. One would expect from the State that it would provide clear and objective information to the public. For example, taking the revenue of the horticultural sectors that use peat as an input is irrelevant; phasing out peat products does not mean that these companies (and their revenue) would disappear. Also, considering the fact that the report insists greatly on the impact on jobs, it would have been useful to see the number of staff employed in mining peat for horticulture (the people who would be truly impacted).

10. Public 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?

There is a climate emergency. Moderation is not appropriate. We believe that there are already alternatives in place for domestic use that are better than peat that are not damaging to the environment. We support an immediate ban on using peat for domestic horticulture. We believe that only a very limited transition period should be permitted for professional crop production, one year at the most.

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)?

Alternatives have been available for a considerable time. Persuasion has not worked and there is still considerable ignorance on the issue. Not only is using peat for horticulture bad for the environment, it is worse for gardens than compost that contains nutrients and encourage worm aeration is not used. In commercial use we are confident that necessity is the mother of invention. An imminent ban would soon give an incentive to using alternatives which might currently have some disadvantages but are viable.

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 destruction of its natural heritage for the sake of exports. We support just transition and believe that job losses should be compensated by retraining and provision of jobs in conservation. We recommend an immediate and total end to the exporting of peat.

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?

No. The time for advice is past, an immediate ban on domestic use and a ban within one year on professional is required. During the transition year carbon tax must be applied to all peat used - based on the carbon impact assuming all the peat used is oxidised away.

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

We do not favour such establishment. If it is formed, however, then workers in the industry should be involved. However the long term view should predominate so environmental groups should make up more than half the representation. Representatives from the Schools climate movement should be included.

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)?

We support retraining those who have lost their jobs and job creation schemes in areas where there is unemployment. However we do not support compensation for those who exploit a resource that should belong to all. We also point out that the alternatives used should create jobs so there should be no net job loss.

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

The time for guiding has gone. We are in a crisis. Ban the use of peat in horticulture.

H. What do you consider the value of peatlands to be to (please score out of 100):
carbon storage 50
nature conservation 50
the provision of ecosystem services the economic social and cultural needs 100

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?

We favour a faster end and believe that alternatives will be improved if the industry has no alternative.

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

No. Banning would obviate such a need. Spend the money more usefully.

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