



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNATHE PHORTAIGH NA HÉIREANN

Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland
Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293

Tel/Teil: +353-(0)45-860133
e-mail/riomhphost: bogs@ipcc.ie web/idirlíon: www.ipcc.ie

Neighborhood Environment Quality Branch
Department of Agriculture, Environment & Rural Affairs
Regulatory and Natural Resources Policy Division
2nd Floor
Klondyke Building
esni@deara-ni.gov.uk

18th December 2019

**RE: Northern Ireland Environment Strategy
Submission from the Irish Peatland Conservation Council**

Dear Sir/Madam,

Thank you for allowing the Irish Peatland Conservation Council the opportunity to contribute to the recently opened public consultation on the Environment Strategy NI. The IPCC are a registered charity and an environmental non-governmental organisation that aims to conserve a representative sample of Irish peatlands for people to enjoy now and in the future. IPCC have published Peatland Action and Conservation Plans since 1989 which include lists of sites that are internationally recognised as areas of conservation importance in the whole of Ireland including Northern Ireland. Specifically IPCC monitor 139 peatlands of conservation importance in Northern Ireland which cover an area of 40,668ha, just 24% of the original area of peatland in Northern Ireland based on the Hammond assessment of 1979. IPCC understand that peatland policy in Northern Ireland may not have been updated since the 1993 *Department of Environment's Peatland Policy Statement* and that a lot more could be done to protect and restore a representative sample of NI's peatland to ecologically functioning habitat, which is of utmost concern with the climate crisis and biodiversity losses affecting the island of Ireland. We wish to acknowledge a number of projects underway in relation to Northern Ireland's peatlands - IUCN-UK Peatland Programme, QUBBES, CANN and CABB.

Ireland's Peatland Conservation Action Plan 2020

The most recent Peatland Conservation Action Plan 2020 published by IPCC includes a section on Northern Ireland's Peatlands. The plan highlights a number of areas of action in relation to policy, management, education and inventory needing strengthening and extra work if peatland conservation and the wise use of peatland resources is to be achieved in the long term. IPCC strongly recommend the development of actions to resolve the following peatland environmental issues in your Environment Strategy.

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| 1) | Survey and designate more peatland ASSIs, as appropriate to ensure that a representative sample of the regions peatlands are protected. | Priority=High |
| 2) | Monitor the delivery of Peatland Habitat, Biodiversity and Species Action Plans. | Priority=High |
| 3) | Review the Northern Ireland Peatland Policy and develop a specific policy updating the 1993 statement | Priority=High |
| 4) | Setup joint equivalent designation and co-ordinate management for all cross border sites. | Priority=High |
| 5) | Actively manage peatland sites containing Marsh Fritillary and Large Heath butterflies. | Priority=High |

35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity Numbers/Uimhir Carthanacht: CHY6829 & RCN 20013547 Registered in Ireland No/Uimhir Cláraithe in Éirinn: 116156

Registered Office/Oifig Cláraithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland

Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/Rúnaí Comhlacht: Rachel Kavanagh

Directors/Stiúrthóirí: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Miriam Mooney, Kate Macnamara, Seán Ó Fearghail.

Patrons/Pátrúnaí: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ní Lamhna, Matthijs Schouten, His Excellency Drs Adriaan Palm, Netherlands Ambassador to Ireland.

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| 6) | Develop a conservation, restoration and wise use plan for all peatlands, so as to provide measures to adapt to climate change and halt biodiversity loss. | Priority=High |
| 7) | Incorporate measures for the eradication of alien plant species in all peatland management plans. | Priority=High |
| 8) | Introduce wider countryside management measures to provide a robust network of protection for threatened peatlands, which lie outside of the Natura 2000 network or the ASSI network and to provide wildlife migration corridors between conserved sites. | Priority=High |
| 9) | Return all peatlands of conservation importance (ASSIs & SACs) in Northern Ireland to favourable condition through restorative management. | Priority=High |
| 10) | Oppose all industrial and private incidents of turf extraction from peatlands of conservation importance. Encourage the prosecution of offenders where appropriate. | Priority=High |
| 11) | Undertake an inventory of all fen habitat in Northern Ireland with a view to designating sites of conservation importance | Priority=High |
| 12) | Review planning applications for industrial peat extraction sites in Northern Ireland which are seeking licensing for the mining process with the condition of providing an after-use plan for the rehabilitation of the cutaway site to a carbon neutral or carbon sequestration condition. | Priority=High |
| 13) | Review the use of peat in horticulture to include a carbon tax on horticultural gardening products and truthful labelling of the peat content of horticultural products on sale to the public through garden centres. | Priority=High |
| 14) | Raised Bog Habitat Classification: Standardise raised bog habitat classification across the island of Ireland particularly the occurrence of *7110 active peat forming raised bog and 7120 Degraded Raised Bog according to the Habitats Directive using ecotopes and hydrological modelling. The National Parks and Wildlife Service in the Republic of Ireland have undertaken extensive research and ecohydrological monitoring in order to define and map these habitats and to undertake their restoration - see <i>National Raised Bog Special Areas of Conservation Management Plan 2017-2022</i> . | Priority=High |
| 15) | Re-instate the Peatlands Park Education Centre with adequate funding to deliver a national peatland education programme across Northern Ireland. The important role of peatlands and the ecosystem services that they provide such as carbon storage, flood control, water quality, recreation and biodiversity refugia need to be continuously promoted through active learning programmes. | Priority=High |

Please acknowledge receipt of this submission. IPCC are available to discuss any recommendation we have made in detail should you wish to contact us.

Yours faithfully



Tristram Whyte -- Freshwater Biology B.Sc(hons)
Conservation and Policy Officer