



IRISH PEATLAND CONSERVATION COUNCIL

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RE: Public Consultation on Draft Prioritised Action Framework for Ireland 2021-2027

Dear National Parks & Wildlife Service,

Thank you for publicising the opportunity to make comments on the public consultation on the Draft Prioritised Action Framework for Ireland 2021-2027 on the NPWS website.

The Irish Peatland Conservation Council (IPCC) campaign and raise awareness for the protection of a representative sample and the sustainable use of Irish Peatlands. 82% of Ireland's original resource of peatland habitat has been lost to industrial and domestic peat extraction, afforestation, land reclamation and development (Foss, O'Connell, Crushell, 2001). The recent report published by National Parks & Wildlife Service entitled The Status of E.U Habitats & Species in Ireland 2019 has reported Raised Bogs and Blanket Bogs to have an overall status of "Bad" and decreasing. The two main Fen habitat types are "Bad" and "Unfavourable" (NPWS, 2019). It is in this regard that we would like to respond to this consultation - with an aim of increasing the Irish Government's focus on this nearly extinct habitat group.

Fens

IPCC understand that NPWS has extensive data in a database created by Dr Peter Foss and that further data on these wetland types is provided by Wetland Surveys Ireland who have undertaken several surveys of wetlands on a county by county basis. These sources provide information on the location and distribution of fen habitat in Ireland. This is most certainly a step forward in the task of designating a representative sample of fen. This data needs to be ground truthed with a full "boots on ground" national fen survey. There is very little information on the geographic variety of Ireland's unique fen types and this needs to be confronted with actual terrestrial observations and mapping so that Ireland can meet the reporting requirements of the European Union on Habitats designated under legislation. IPCC regard this work as a top priority.

Blanket Bogs

There are a number of issues still holding Ireland back from effective protection of blanket bog habitat.

Assessment:- There is still no real information on the condition and integrity of the peat and peat forming function of blanket bog. It is also necessary to determine what actually is "Active" blanket bog and whether the same ecotypes used on raised bog can be applied to blanket bog. In terms of protecting the biodiversity, ecology and carbon resources of blanket bog this needs to be tackled with extensive studies as we cannot be sure what efforts need to be done to halt any degradation occurring. A collaboration with Scottish Natural Heritage on blanket bog assessment methods might be useful as this country is actively managing and monitoring their extensive blanket bog resource.

Management:- There are questions that need to be answered regarding effective management of blanket bog. There is still no consensus on whether grazing is a problem and what levels are acceptable. IPCC's interpretation of the grazing guidelines which are available on the NPWS website suggest that 1 ewe/ha/yr is the maximum limit (1 ewe=0.15LU) for blanket bog and wet heath habitats. The Scottish Agricultural College reports that 0.06LU/ha/yr should be the limit. The grazing limits need to be investigated further and reports made public to show why Ireland has twice the stocking density recommended. If found to be too high - the limits need to cut back to adhere to the precautionary principle. The Conservation Objectives for these sites also need to be finalized and presented to public/landowners and farmers with effective dialogue, involvement and sufficient compensation. Regardless of what level of stocking is proposed, IPCC feel strongly that the whole issue of grazing on peatlands and the effectiveness of measures taken to date need to be evaluated to check that they are compatible with the sustainable management of blanket bog resources.

Conservation Targets:- There is currently no national conservation target for active blanket bog in Ireland as there is for Active Raised Bogs. This points to a lack of understanding on behalf of the NPWS on what constitutes active blanket bog. Research and modelling in this area to provide a national conservation target is outstanding and should be prioritised.

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: Lullymore, Rathangan, Co.Kildare, R51V293, 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.

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Raised Bogs

Bord na Móna:- The raised bog designation process needs to be completed. Bord na Móna has sites awaiting SAC and NHA designation so that we can reach our conservation targets for active raised bog habitat. These sites need to be publically announced and officially protected.

NHA Network:- The results of the NHA Raised Bog Review has led to a proposed reconfiguration of the NHA Raised Bog Network. This also needs to be finalized and the list of raised bog sites finalised so that they can be protected through legislation and planning from the threat of drainage, peat harvesting and burning.

Restoration

Communication & Transparency:- IPCC are disappointed that €5,000,000 is being used to restore peatland on state-owned land only in 2020. If it is costing €60,000,000 to compensate turf cutters for not cutting then the public need to see restoration on lands not owned by the state. Finances need to be made available for restoration on land owned by other stakeholders and used to restore confidence in the NPWS. Bridges need to be built allowing the NPWS to gain access to sites not owned by the state so that they can undertake whole site restoration, not partial restoration. IPCC would like to see a team of negotiators on the ground working with communities so that real site restoration can be undertaken.

Cycles:- A one billion euro (€1,000,000,000) cost has been proposed as the budget needed to complete restoration of Ireland's peatlands and protect the carbon stored in various habitats (Shane Regan, pers.comm, NPWS). At the level of €5 million provided by Government this year, IPCC estimate that it will take a minimum of 200 years to restore Ireland's peatlands. This is not sustainable as the sites will be extinct over this period. Therefore the restoration budget needs to be multiplied 10 fold to achieve protection within the next 20 years. This level of funding needs to be released to all sectors of the economy including sustainable transport, industry, energy, tourism and the environment if we (Ireland) are to be serious about nature protection, carbon stocks protection, water management and other ecosystem services provided by peatlands in the present and future.

The IPCC thank you for allowing us to feed our concerns into this Draft Prioritized Action Review and are willing to discuss this.

Yours faithfully,



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References

The Bogs and Fens of Ireland Conservation Plan 2005, The Irish Peatland Conservation Council, Dr Peter Foss, Dr Catherine O'Connell and Mr Patrick Crushell M.Sc., 2001.

The Status of EU Protected Habitats and Species in Ireland, NPWS, 2019.

Shane Regan, pers.comm, NPWS - Backing Our Bogs Conference University College Dublin 21.7.20