



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

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Minister Madigan
Heritage Ireland 2030
Department of Culture, Heritage and the Gaeltacht
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RE: Heritage Ireland 2030 Consultation

Dear Minister Madigan,

Thank you for allowing the Irish Peatland Conservation Council (IPCC) a chance to voice our opinion on how heritage should be addressed going into the future through the Heritage Ireland Consultation 2030. The IPCC was established in 1982 and has 35 years of experience in peatland conservation, education, research and community engagement. Our aim is to conserve a representative sample of intact peatlands for people to enjoy now and in the future. Our work is guided by our 6th Action Plan, Ireland's Peatland Conservation Action Plan 2020, which was published in 2009. A copy of this document is available for download on our website at www.ipcc.ie. Many of the actions in our plan have been included within the National Peatlands Strategy which has been adopted by every Government Department and Local Authority. The National Peatlands Strategy can be downloaded from www.npws.ie. Furthermore IPCC's work has been given full recognition in the BOG-LAND Report commissioned by the EPA.

Peatlands are regarded as one of the harshest environments on the planet because they are waterlogged and lack oxygen in their soil. Species of plant and animal need special strategies to survive in them. But, peatlands are actually ecosystem superheroes. They provide important functions such as purifying water, sometimes mitigating flooding and providing a home for rare plants, animals and biodiversity. Peatlands beat every other terrestrial ecosystem when it comes to carbon storage. 75% of the national Soil Organic Carbon is stored within them. On top of that they are part of the cultural heritage of our people and they have an immense recreational value. Peatlands (including fens, raised bogs, blanket bogs and heathlands) cover almost 20% of the land area of the country. Despite their immense value to Irish Natural Heritage some peatland types are facing real extinction. Our peatland habitats are drying, shrinking, cracking, slumping and eroding. A comparison of two reports produced by the National Parks and Wildlife Service on the Status of EU Protected Habitats and Species in Ireland Report from 2007 and 2013 (NPWS 2013) has seen some peatland habitats moving from an overall status of inadequate to bad and increasingly bad in the 6 year period. Heritage Ireland 2030 needs to include specific objectives to deliver the protection and wise use of peatlands.

IPCC wish to make the submission below to the Heritage Ireland 2030 document. The outline of the plan includes the scene with regard to peatlands and their current status. This is followed by a number of topics which need to be addressed if the overall vision of the Heritage Ireland 2030 process is to be realised.

1. Current Status of Peatlands in Ireland

Peatlands are under serious threat from a wide variety of human impacts. Fens are being polluted through nitrogen deposition, infilling and water pollution. Raised Bogs are being physically removed from the landscape by turf cutting and moss peat extraction. Blanket bogs are being degraded through drainage, turf extraction, agriculture, recreation and wind farm developments. All sites are continuously degrading due to the unchecked effects of human impact and the lack of timely restoration and management. In this context the country has a resource of conservation-worthy peatlands in the region of 250,000 to 275,000ha which need protection, restoration and sustainable management. This is just over 20% of the original area of peatlands in Ireland.

35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity No/*Uimhir Carthanacht*: CHY6829 Registered in Ireland No/*Uimhir Cláraithe in Éirinn*: 116156 Registered Office/*Offig 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

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Patrons/*Pátrúnaí*: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,
Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

2. Fen Conservation

Fens are the suite of alkaline peatland types in Ireland. The original area of fen was 92,508ha, they are a significant peatland type. The National Peatlands Strategy has virtually no mention of fen habitats and biodiversity in Ireland with just one action point relating to ecohydrological research. A national fen survey needs to be funded and conducted immediately by Ministerial sanction. A fen survey has been included as Action No. 52 in the Government's Prioritised Action Framework for the Natura 2000 network. This document has been in place since 2014 and will continue until 2020. The National Parks and Wildlife Service have a list of 880 sites that need to be field surveyed and designated. Wetland Surveys Ireland have a further 1660 fens in their database that have no status and should be included. A fens working group was promised by NPWS for 2018 but this has not happened. If we fail to undertake the fen survey, habitats cannot be designated or given protection and this has negative knock on effects in planning. We are failing to preserve fen biodiversity and ecosystems so we ask Heritage Ireland 2030 to make this a priority objective.

3. Raised Bogs Site Designation

The Government needs to immediately complete the designation of the network of 61 Natural Heritage Area (NHA) raised bogs that support the SAC raised bogs using the Wildlife Amendment Bill 2016. Land owners need to be informed and made aware of the importance of the designation. This work has been outstanding since 2014. IPCC note that the legislation will allow the Minister to de-designate partially or in full 46 previously designated NHAs. This cannot take place until the new sites are designated. IPCC would like Heritage Ireland 2030 to include this provision.

4. Raised Bog Management Plans

Each designated raised bog has its own hydrological management plan. The plans have not gone to landowner consultation with the result that the sites affected cannot be managed and they continue to degrade. This inaction is a trigger that IPCC believe is driving raised bogs to extinction. In the spirit of Heritage Ireland 2030 which strongly advocates community engagement, this consultation must be a priority if we are to deliver the wider conservation of peatlands.

5. Moss Peat Extraction

Although we have heard about the phasing out of industrial peat extraction for fuel energy, extraction for horticulture continues apace, particularly targeting raised bog resources. Already in 2019, Dooleystown Bog in Co. Meath has been partially drained without planning permission for the scale of the development undertaken. In 2018 Mostrim Bog in Co. Longford was illegally drained within the bird nesting season. Again, the scale of this development would have required planning permission but in this case the operation was covered by Environmental Protection Agency Licence and does not need planning permission. The Government needs to phase out and ban horticultural peat extraction from our peatlands immediately to remove this significant threat to our almost extinct raised bog resources. Heritage Ireland 2030 needs to promote the sustainable use and management of peatlands outside protected areas. For example the use of moss peat in public spaces should be phased out as demonstration of the commitment of Heritage Ireland 2030 to raised bog conservation.

5. Blanket Bogs

Turf cutting is a threat on all blanket bog sites, including sites designated as Special Areas of Conservation and Natural Heritage Areas. Turf cutting within designated sites on existing turf banks is a permitted activity. However, the opening of new turf banks within SACs requires ministerial consent. On the ground IPCC find that our government is currently allowing turf cutting to continue everywhere unregulated in the absence of research showing the effects this activity is having on the ecohydrology of the blanket bog. This research is an urgent priority and a necessary step in planning a roadmap for the conservation of blanket bogs. The Government needs to set conservation targets for blanket bog habitats and ensure that prohibited activities in designated sites do not occur. This can be accommodated through engagement with the public and the development of Payment Packages for land-owners who engage with peatland conservation. The NPWS were due to publish assessment reports on the impact of turf cutting on blanket bogs in 2017 but this has not occurred. The Department of Culture, Heritage and the Gaeltacht would be well advised to follow up on the results of this research work so that targets can be set, communities can be engaged and real protection and management for blanket bogs can take place. IPCC need these targets to be included in Heritage Ireland 2030.

6. Education and Community Engagement

Given the high profile that peatlands have in Ireland particularly in relation to the restrictions on turf cutting needed to protect sites and the civil unrest which this causes, the Government should have a visitor and education centre that is open year round in the Midlands. The Clara Bog Visitor Centre is open seasonally and this is subject to the availability of personnel and funding each year. If Heritage Ireland 2030 is serious about the Preservation of the Biodiversity and Ecosystems of Peatlands, there must be specific objectives regarding raising awareness and formal education around peatlands. This activity needs to be conducted year round and in a sustained manner. IPCC is aware of education work being undertaken through the LIFE Raised Bog Restoration Project, but we stress that this is only a short term project which only impacts on the 12 sites involved in the project. We need a national raised bog conservation and education centre. IPCC run the Bog of Allen Nature Centre in Co. Kildare which is open year round but we receive no subvention from Government towards the provision of services at this centre. We would be happy to collaborate with Government and Heritage Ireland 2030 on the delivery of in-schools formal education focusing on peatlands, skills training for communities engaged in peatland conservation and on visitor awareness programmes.

7. Windfarms on Uplands

In the past 12 months IPCC have replied to 14 wind farm consultations on blanket bog habitats who contacted us. IPCC support green energy initiatives but we are against wind farm development in upland blanket bogs. They are a risk for birds and bats and they fragment the integrity of the blanket bog habitat as they require a road infrastructure. And most importantly we cannot see sites

being degraded when there are currently no national conservation targets for blanket bog conservation. Once wind farm developments on blanket bog sites go to planning, IPCC have found that it is only the runoff threat that the development poses into rivers that contain freshwater pearl mussel that convinces planning authorities to refuse a development. Why does the blanket bog habitat, which is one of the rarest with the most restricted distribution in Europe and which provides people with so many services including recreation, clean water and climate regulation for free, not have a value in planning decisions? A case study illustrates this point. In 2009 planning permission was given for an 11 turbine wind farm development within the Lough Derryduff/West of Ardara/Maas Road SAC in Co. Donegal. Heritage Ireland 2030 needs to include objectives that educate all citizens about the ecosystem services that peatlands provide for free. This needs to be lifelong and targeted to all Irish citizens. And similarly, those in authority must respect wildlife and habitat designations.

8. Cutover Bog Rehabilitation Plans

Heritage Ireland 2030 needs to be broad enough to consider the future use of the midland cutaway bogs owned by Bord na Móna. How these emerging landscapes rehabilitated and managed have implications for Irish Natural Heritage, biodiversity, climate change and employment. In the past year IPCC have reviewed 5 Rehabilitation Plans for former Bord na Móna industrial sites. This is done in the context of the Bord meeting Condition 10 of their Integrated Pollution Control Licence which requires stabilization of the peat. Sites for rehabilitation present a number of scenarios. They can include significant areas of high bog that were ditched but never developed to industrial peat extraction and areas of shallow peat that have been exhausted of their economic peat deposit. A number of issues require the oversight of Heritage Ireland 2030 in this area, particularly the development of detailed guidelines on what is expected from the rehabilitation process with reference to climate change, biodiversity protection, raised bog restoration and recreation. It is widely understood that the rewetting of the shallow peat resources remaining in industrial sites is the best mechanism to regulate carbon emissions from these sites. In practice only 20% of a rehabilitation site or less is rewetted. This is largely achieved through drain and outfall blocking management at very little expense to the peat mining company. The rewetted area could be greatly increased if more attention was paid to landscaping the abandoned sites, removing raised areas and infilling deeper depressions remaining. In practice IPCC find that there remains significant areas of bare peat on “rehabilitated sites” which means they continue to be a source of greenhouse gas. Wetlands are the preferred habitat for wading birds and for invertebrate species which significantly increase the biodiversity value of the industrial cutaway bogs but rehabilitated sites are not managed for biodiversity due to lack of funding and guidelines from the National Parks and Wildlife Service in this area. IPCC are also concerned that any areas of acid peat deposit remaining should be included in the Bord na Móna Raised Bog Conservation Programme, particularly ditched sites that were never advanced into industrial peat extraction. With only 3600ha of raised bog remaining in the country, every site already in state ownership must have its hydrology restored and be managed for conservation. Again Heritage Ireland 2030 needs to recommend the development of policy and guidelines in this area.

9. Funding for Heritage Ireland 2030 Delivery

Additional staff and finance are critical for the NPWS to work effectively with stakeholders, communities and the public to meet the Heritage Ireland 2030 Vision. IPCC would recommend Heritage Ireland 2030 includes an objective to establish NPWS officers with responsibility for fens, cutaway bogs, cutover bogs and community engagement who can work with local authorities, statutory bodies, eNGOs, communities and citizens. It is regrettable in 2019 that the Heritage Council are not funding Wildlife Management projects. The loss of this fund will impact community engagement and citizen science projects across the country which will have knock-on effects for the National Biodiversity Data Centre who rely on Citizen scientists for records.

10. Health & Well-Being

Ireland’s peatland resources offer a significant recreational value to residents and visitors alike. IPCC monitor the use of protected sites for recreation. Over 100 sites within the IPCC Sites Database lists recreation as an activity within the protected habitat. This includes the provision of interpretive facilities, visitor centres, loop walks and boardwalks. Heritage Ireland 2030 needs to create a linked up network of open-to-the-public Heritage sites throughout the country. There is a need for far greater integration of the different types of Heritage sites open to the public through the provision of signage on the ground and online. For example the Greenway in County Kildare on the Canal route should link up Heritage attractions and sites with the main walking route. Heritage Ireland 2030 must ensure that initiatives like Ireland’s Ancient East includes all of the landscape habitats and features that are relevant to this theme and not just those features that are commonly visited or which have a high profile Natural Heritage.

11. Farming Incentives

Heritage Ireland 2030 needs to recognise farmers in delivering it’s vision. How the land is utilised and managed has a huge impact on species from pollinators through to birds of prey. Farmers need to be encouraged to work with nature if we are to protect species such as Curlew, Red Grouse, Hen-Harrier, Marsh Fritillary, Large Heath and the Irish Hare. A critical part of Heritage Ireland 2030 is to attract funding by convincing politicians about the importance of Natural Heritage.

12. Consumer Activity -- Heritage in Action

Heritage Ireland 2030 needs to include provisions to incentivise the broad adoption of peat-free gardening products and the use of native plants and planting schemes across all sectors. For instance many department stores use non-native plants to decorate the surrounding environment/carparks. Heritage Ireland 2030 needs to give local authorities the power to ensure that peat-free composts and native species are used within these developments. This could be a keystone action to improve native biodiversity and reduce the use of peat based products nationally.

12. Dumping

The IPCC have witnessed an increasing number of illegal dumping incidents on the charities Nature Reserves and roadside verges. This is not just an issue for IPCC. Within IPCC's Site Database, 10% of sites are listed as being damaged by dumping. Heritage Ireland 2030 needs to recognise that there has to be increased education and awareness and implement a plan to reduce dumping nationally. Outreach, national media campaigns and citizen engagement with a focus on peatlands and the need for them to be rubbish free have to be built into the plan if they are to provide us with the ecosystem services we need.

Yours Sincerely,



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Tristram Whyte - B.Sc(hons) - Conservation Policy & Fundraising Officer