

IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

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Use of Carbon Tax Revenues – Public Consultation, Tax Division, Department of Finance, Government Buildings, Upper Merrion Street, Dublin 2 D02 R583 12th June 2019

RE: Consultation on the uses of the Carbon Tax

Dear Sir/Madam,

Thank you for allowing the Irish Peatland Conservation Council to have input on how the funds raised by the carbon tax should be distributed.

As a registered charity working towards the protection and conservation of a representative sample of Irish Peatlands we would see it as an effective feedback loop if the carbon tax was spent repairing Ireland's degraded peatlands, which currently is one of the largest carbon sources in Ireland. This would directly lower Ireland's carbon emissions, improve Ireland's terrestrial and aquatic freshwater habitats, alleviate flooding and provide more wetland habitat for our native flora and fauna.

While designated conservation sites, such as the Natural Heritage Areas (NHA) and Special Areas of Conservation (SAC) avail of funding from the EU (such as the LIFE Project), the vast majority of bogland is left in a degraded state open to peat piracy. Most turf extraction is un-regulated and there is no onus on contractors to mitigate environmental damage while drainage and extraction commences, and they are at liberty to walk away when finished. This type of activity has lasting consequences for Ireland's aquatic habitats as peat sediment enters our rivers and lakes causing sedimentation of gravel beds which are important breeding grounds to species such as Salmon, Trout and Pearl Mussel. Peat sedimentation also causes eutrophication of Ireland's rivers and lakes. Peat is an organic material which once extracted breaks down and releases excess nutrients into aquatic habitats. This causes algal blooms and oxygen deficiencies. This leads to mass fish kills. There are also issues with un-regulated peat extraction releasing atmospheric mercury and ammonia into Ireland's waterways which is having a detrimental effect on the aquatic ecology.

Healthy peatlands are carbon sinks, removing carbon from the atmosphere and locking it away under a high water table, thereby removing it from the carbon cycle. Degraded peatlands emit vast amounts of carbon as the oxygen is allowed to enter the peatland (due to drainage) and can start to break down the organic material. Since Ireland designated the Raised Bog SACs and NHAs we have lost ~37% of the actively growing bog within the protected sites (NPWS Raised Bog SAC Management Plan 2017-2022). In the fight against climate-change it has become apparent that we are not doing enough to climate-proof peatlands. This is highlighted in a report by the Environmental Protection Agency entitled VAPOR which damningly illustrates that if our peatlands are not rewet soon enough they can not adapt to climate change and will still become carbon sources.

The Irish Peatland Conservation Council regulary receive enquiries from members of the public wishing to start small conservation projects on their local bogland. Many of these bogs are where they grew up footing and turning turf and now wish to re-instate the bogland as an activly growing peatland before it is too late. Although we can direct them to liase with other like-minded conservation groups and help them to understand what is necessary to manage the hydrology of the bog in an effort to rewet them, funding streams are very few.

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Charity No/Uimhir Carthanacht. CHY6829 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.

The funds raised by the carbon tax could be made available via a grant based system which would allow small comunity groups the opportunity to block drains and manage the hydrology of their local bogland (the main peatland conservation tool). The funding could also allow local groups to create boardwalks and other amenity interests. Not only would this help to rebuild Ireland's environment but would also go some way in alleviating the cultural disparity between turf cutting and natural heritage/biodiversity protection by providing a new and different outlet for the local communities, this has only sustainable benefits.

Thank you for taking the time to read our through our thoughts on the where the revenue of the carbon tax should be distributed, which we feel would be put to good use if spent on restoration of Ireland's rare peatland habitats.

Your Sincerely,

Tristrom Whyte

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