12. Pricing and Funding Restoration

an investment in natural capital

Site restoration and management works on Irish peatlands are being funded through a range of schemes including the carbon tax, climate action fund, the EU Life Programme, InterregVA, the Department of Agriculture's Green, Low Carbon, Agri-Environment Scheme (GLAS) and the European Innovation Partnership (EIP) funded through the EIP-Agri budget of the Department of Agriculture. Restoration requires a long-term financial commitment from government, which may only be realistically sustained through developing a mechanism for business support in return for specific benefits such as carbon credits (see Figure 26).

Cost of Restoration

The raised bog SAC Management Plan1 estimates over €22m for ecohydrological restoration measures for the first of three cycles of restoration from 2017-2022 for raised bogs. €96m for compensation payments to turf cutters (€23,000 to 4168 turf cutters) formerly working sites is needed. These values exclude associated public sector costs of the Department of Culture, Heritage and the Gaeltacht and other government departments, the cost of research contracts to develop restoration plans and costs already incurred by other restoration works carried out prior to 2017 including €4.65 million spent by Coillte on the removal of conifer plantations from 29 raised bogs (at a mean cost of €160,391 per site).

Specifically the Living Bog Raised Bog Restoration Programme (LIFE14 NAT/IE/000032) cost was €5.4 million for partial restoration on 12 raised bog sites over a 5-6 year period. In 2020 the Irish government approved €5 million for raised bog restoration on state owned land in 9 raised bogs. These two projects involving a total of 21 sites suggest an average cost of €495,238 per raised bog for ecohydrological restoration plus an additional €1.08m per site to compensate turf cutters (based on an average number of 47 turf cutters per site). Using these figures IPCC estimate a budget of between €180m and €202m to restore the raised bog network of between 114 and 128 sites. This would yield 3,600ha of active peat forming raised bog and secure the carbon stock of 40.5 million t C in 30,867ha of supporting habitat which would be a sink for CO2 of -0.48 t C ha-1 yr-1 and a source of CH₄ of +0.197 t C ha-1 yr⁻¹ (i.e. an overall carbon sink).

In view of the costs involved it is not surprising that a €1 billion budget cost has been proposed to complete restoration of all of Ireland's peatlands and protect the carbon stored in various habitats (Regan 2020²). At the level of €5 million provided by government in 2020, IPCC estimate that it will take a minimum of 200 years to restore Ireland's peatlands. This is not sustainable as the sites will become extinct over this period. Therefore the restoration budget needs to be multiplied 10 fold to €50 million per year to achieve protection and greenhouse gas reduction from peatlands within a realistic time frame of the next 20 years, i.e. by 2040.

Peatlands Community Engagement Scheme The Department of Culture, Heritage and the Gaeltacht set up a fund to provide small grants to community groups for peatland research, restoration and education projects. The annual budget/award level for the scheme in the first four years of operation was as follows:

2018 - €137,000 2019 - €131,000 2020 - €100,000 2021 - €200,000

Projects were funded to a maximum of 75% of costs capped at €25,000. At these levels a community group applying for funds cannot for example achieve drain blocking across a peatland site. This situation is unfair in light of the level of funding being spent by government on state-owned peatland.

Cessation of Turf Cutting Compensation Scheme

A payment of €1,500 per annum (index linked) for 15 years together with a once-off incentive payment of €500 is given to turf cutters in raised bog SACs and NHAs deemed to meet certain criteria. To the qualifying individual this is worth at least €23,000. By the 30th November 2020, 4168 turf cutters applied to the scheme and €36.7 million has been paid out. This scheme will cost government at least €96 million upon completion.

Protected Raised Bog Restoration Incentive Scheme Within the Living Bog Raised Bog Restoration Project a new scheme was put in place to provide local landowners with a payment for facilitating restoration. The Incentive Scheme made a minimum payment of €1,000 per landowner or €1,450 per hectare

1 National Raised Bog Special Areas of Conservation Management Plan 2017-2022, National Parks and Wildlife Service, Department of Culture, Heritage and the Gaettacht, Dublin 2 Regan, S. (2020) An Introduction to Irish peatlands: extent, pressures, conservation and value. Presentation to Backing Our Bogs Conference University College Dublin 21.7.20

(Jack McGauley pers comm 19.10.20).

Funding Restoration Long-term Finance must be made available for restoration on peatland owned by other stakeholders besides the State. Complete site restoration is needed, not partial restoration on state-owned land in bog sites. A new funding source for peatland restoration is the value of the "saved emissions" or carbon credits that are made through drain blocking and other measures in peatlands. Peatland researchers have calculated how much carbon can be saved through restoration. This data allows for the development of carbon credits and in the UK the Peatland Code (see Figure 26) is such a system operated by the IUCN. Sites enter the restoration programme for at least 30 years and the carbon credits are bought by sponsors to offset their carbon footprint. This process provides a long-term revenue stream for peatland restoration, topping up Government funds.



ures in return for the carbon credits they can provide to business and community. Source: https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2019-07/290918%20Peatland%20Code%20poster.pdf (Downloaded on 13.10.2020).

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13. Climate Change Policy & Peatlands

providing evidence to improve practice

Sound public policy for peatland protection is critical to the success of long-term climate change mitigation. In this chapter the Irish Peatland Conservation Council examine current practice in relation to the management of peatlands to see whether they are net climate savers or climate killers.

National Peatland Strategy

The main peatland policy document in Ireland is the Peatland Strategy which was published in 2015¹. This Strategy guides the government's approach to peatland management and conservation in the future, taking into account current and potential uses of this key resource.

The Strategy was developed by the Peatlands Council, a stakeholder group established by government on the 7th April 2011. The Council was established to respond to commitments set out in the Programme for Government and to assist Ireland in responding in a strategic way to the requirements of the EU

Table 15: Policy documents impacting on Irish Peatlands in relation to Climate Change

- The National Raised Bog Special Areas of Conservation Management Plan 2017-2022
- * The Climate Action Plan 2019
- National Biodiversity Action Plan 2017-2021
- * The Wildlife (Amendment) Bill 2016
- * Land use, land-use change and forestry (LULUCF) regulation for
- 2021-2030 * Draft Wind Energy Development Guidelines
- * Sustainable Development Goals National Implementation Plan.
- Status of EU Habitats and Species Report 2019
- * Peat in the Horticultural Industry Review (on-going 2019-2020)

Habitat's Directive. This Directive requires Ireland to protect and conserve important peatland habitats. The Council is independently chaired and is made up of representatives from the Irish Peatland Conservation Council, Coillte, Irish Farmers Association, Irish Environmental Network, Irish Rural Link, Bord na Móna and National Parks and Wildlife Service.

The document contains a series of principles and actions in relation to peatlands. It has been accepted and recognized by all government departments. However this document is currently under review. The revised strategy must strengthen policy and action in relation to blanket bogs and fens and regulate and manage the country's peat resources. We must see realistic timelines set for the various actions to be achieved for example by 2025, by 2035 and by 2050. Information on who is responsible for the implementation of the actions needs to be included for transparency.

Since publication of the Peatland Strategy many additional policy documents have been issued by government which have a bearing on Climate Change (see Table 15) and in general they acknowledge the important role that peatlands play in climate but do little else.

Turf and Carbon Tax

The most recently published Climate Bill commits to bringing Ireland to net zero carbon emissions by 2050 (see Table 16). In response to the Bill, the Government announced an increase of €7.50 on the carbon

Table 1	6: Ireland's Climate Change	Policy Timeline

Date	Event/Publication	Commitment
2002	Ireland ratifies Kyoto Treaty on climate change	To stabilise GHG emissions from 2008 to 2012 to 13% above the 1990 levels
2007	National Climate Change Strategy 2007-2012	Sets out a range of measures to meet Ireland's European climate change commitments
2015	Climate Action and Low Carbon Development Act	Placed national climate policy in legislation
2016	Ireland ratify the Paris Agreement	Limit global temperature increase to well below 2º C, while pursuing efforts to limit the increase to 1.5º C
2017	National Mitigation Plan	Contains over 100 existing mitigation measures and those under consideration - described as a 'first step' towards 2050
2018	Planning for a Climate Resilient Ireland	Ireland's first statutory National Adaptation Framework
2019	Climate Action Plan To Tackle Climate Breakdown	The plan commits to evaluate in detail the changes required to adopt a net zero target by 2050 and acknowledges the challenges ahead to achieve this target
2020	Climate Action and Low Carbon Development (Amendment) Bill 2020	Establishes, in law, a climate resilient and climate neutral economy by 2050 and introduces a system of successive 5-year, economy-wide carbon budgets starting in 2021

1 National Parks and Wildlife Service (2015) National Peatlands Strategy, Department of Arts, Heritage and the Gaeltacht, Dublin.

tax on fuel bringing it to €33.50 per tonne to include auto and solid fuels. This is welcome as carbon tax revenue is being utilised to restore peatlands and therefore reduce greenhouse gas emissions. However this policy has a serious loop hole. The tax does not apply to private turf production for domestic use as this fuel is not being purchased and at the point of cutting from the bog it is not suitable for burning. It must be dried first. For

Figure 27: Energy-related CO₂ emissions in Ireland 2005-2018¹ demonstrate that peat products have the highest emissions of all fuel types used. Photo: © SEAI¹

	t CO ₃ /TJ (NCV)	g CO ₃ /kWh (NCV)
Liquid Fuels		
Motor Spirit (Gasoline)	70.0	251.9
Jet Kerosene	71.4	257.0
Other Kerosene	71.4	257.0
Gas/Diesel Oil	73.3	263.9
Residual Oil	76.0	273.6
LPG	63.7	229.3
Naphtha	73.3	264.0
Petroleum Coke	92.9	334.5
Solid Fuels and Derivatives		
Coal	94.6	340.6
Milled Peat	116.7	420.0
Sod Peat	104.0	374.4
Peat Briquettes	98.9	355.9
Gəs		-
Natural Gas	56.9	204.7
Electricity		
(2018)	104.2	375.2

these reasons turf cut for domestic use escapes the carbon tax. IPCC are concerned that increasing the tax on other fuels that may be used by households for heating which directly affects household budgets will be a driver for an intensification of private turf cutting. Despite greenhouse gas emissions being the highest from turf of all fossil fuels (see Figure 27¹), there is no carbon tax to be paid on its production. Should we see an increase in the volume of turf being burned annually there will be an automatic increase in greenhouse gas emissions. The Government must resolve such issues if its Climate Bill is to be effective and not simply a practical climate killing policy.

Protecting Sites from Harmful Development

Amendments are necessary to the Wildlife Act 1976 (and Amendment 2000) to allow for the reconfiguration of the raised bog natural heritage area network. Until these amendments are signed into law, it is Government policy not to release the full details of the network of peatlands nor to contact the owners of the sites proposed for inclusion in the new network. Meanwhile it is impossible for Planning Authorities and other regulators to properly control damaging development. Another climate killing policy.

Stopping Turf Cutting on Designated Raised Sites

National Parks and Wildlife Service have revealed that turf cutting is continuing on 287 plots across 16 raised bog SACs in 2020. The information came to light following a Freedom of Information enquiry made by the Irish Wildlife Trust and published 12th November 2020 at www.iwt.ie. Clearly enhanced community engagement is needed involving listening to turf cutters plans and developing creative incentive packages to put an end to turf cutting on SACs. Monitoring the demise of the sites through the defiant action of turf cutters is a climate killing policy and is unacceptable.



Conflicting Peatland Management Decisions

Irish Peatland Conservation Council are continually coming across conflict in the manner in which decisions are made on how peatlands are to be managed. For example Kildare County Council refused planning permission for the development of a solar energy project on Timahoe bog, stating that they were concerned about the disturbance to deep peat deposits that the development would incur and the impact on climate change of peat oxidization. Similarly they (and subsequently An Bord Pleanála) refused planning permission to allow for turf cutting on an area of peatland adjacent to Ballynafagh Bog SAC on the grounds of climate change and the impact that the peat cutting and the subsequent longer term burning of the turf cut would have on climate change. These are good examples of climate saving policy in action. On the other hand, Kildare County Council are allowing the cutting of turf and moss peat on Snipe Bog near Monasterevin, in the county which clearly is releasing carbon and impacting the environment (see Figure 28). Either climate change and its prevention is an issue or it is not and there is a need for clear policy that is rigorously and consistently implemented.



Figure 28: Snipe Bog in Co. Kildare. Turf cutting from the perimeters and a new moss peat extraction development reported to IPCC in 2020 is systematically removing all of the high bog area. This activity is permitted but is at odds with protecting carbon stocks contained in peatlands and with the Kildare Climate Adaptation Strategy. Photo: image on the left is © Bing Maps 2020. Photo: on the right © Google Maps 2020.

1 Energy-related CO2 emissions in Ireland 2005-2018. SEAI 2020 Report

Summary of the legal position in respect of peat extraction in Ireland¹

(i). There is an obligation to obtain planning permission in respect of any peat extraction project which requires assessment under either the Environmental Impact Assessment (EIA) Directive or the Habitats Directive. An EIA is mandatory, under domestic law, where the peat extraction would involve a "new or extended" area of 30 hectares or more. (See Planning and Development Regulations 2001, Schedule 5, Part 2, paragraph 2(a)). In the case of sub-threshold development, a screening determination would have to be made by reference to the detailed criteria set out at Schedule 7 of the Planning and Development Regulations 2001. A screening determination for the purposes of article 6(3) of the Habitats Directive would also have to be undertaken.

(ii). Peat extraction which is being carried out without the benefit of planning permission, where required, is vulnerable to enforcement proceedings.

Any person is entitled to apply for orders pursuant to section 160 of the Planning and Development Act (PDA) 2000. There is no time-limit on an application seeking an order which requires the cessation of peat extraction. A planning authority is empowered to serve an enforcement notice and/or to apply for orders pursuant to section 160 of the PDA 2000. Where a complaint is made and (i) a planning authority establishes, following an investigation, that unauthorised development (other than development that is of a trivial or minor nature) is being carried out, and (ii) the person who has carried out or is carrying out the development has not proceeded to remedy the position, then the authority is obliged to issue an enforcement notice and/or to make an application pursuant to section 160 unless there are compelling reasons for not doing so. (See section 153(7) of the PDA 2000 (as inserted by the Environment (Miscellaneous Provisions) Act 2011)).

(iii). Section 5 of the PDA 2000 provides a simple procedure whereby the question of whether a particular development (including peat extraction) requires planning permission can be determined, initially, by the planning authority and, thereafter, on review by An Bord Pleanála. By way of example, the proceedings in Bulrush Horticultural Ltd. v. An Bord Pleanála arose out of a section 5 declaration made by An Bord Pleanála in respect of peat extraction. A section 5 declaration, which has not been challenged by way of judicial review, can be relied upon to ground enforcement proceedings. (See Killross Properties Ltd v. Electricity Supply Board [2016] IECA 207; [2016] 1 I.R. 541).

(iv). In the event that a developer carrying out peat extraction wishes to regularise the planning status of the activity—for example, in response to the threat of enforcement proceedings—then the substitute consent procedure under Part XA of the PDA 2000 has to be invoked. Relevantly, there is no automatic entitlement to apply for substitute consent; rather, a developer has to apply first to An Bord Pleanála for leave to make an application for substitute consent. The Board may only grant leave to apply if it is satisfied that "exceptional circumstances" exist such that the Board considers it appropriate to permit the opportunity for regularisation of the development by permitting an application for substitute consent.

(v). In parallel to the planning legislation, certain large-scale peat extraction involving an area in excess of 50 hectares is subject to licensing by the EPA under Part IV of the Environmental Protection Agency Act 1992.

Source: Judgment of Mr. Justice Garrett Simons delivered on 20 September 2019 in case 2019 No. 222 J.R. between FRIENDS OF THE IRISH ENVIRONMENT LIMITED (Applicant), MINISTER FOR COMMUNICATIONS, CLIMATE ACTION AND ENVIRONMENT MINISTER FOR HOUSING, PLANNING AND LOCAL GOVERNMENT IRELAND AND THE ATTORNEY GENERAL (Respondents)

Controlling Peatland Drainage for Extraction

Small scale turf extraction and moss peat production occur across numerous sites in Ireland. Such activity drives climate change. In practice land managers from local authorities and wildlife rangers right through to individual landowners have a lack of understanding of the legal position pertaining to the control of peatland development in Ireland. A recent Judgement by Mr Justice Garrett Simons¹ provides clarification on this complex area of planning law. That there has never been an Environmental Impact Assessment undertaken for an industrial peat development project in Ireland despite over

80,000ha of land being in peat production is another example of the lack of planning control in this area.

Land Purchase for Conservation Existing policy of the National Parks and Wildlife Service is to only purchase peatland sites that are damaged (M. Eakin EPA 26.2.2019). Such a policy makes no sense given the importance of peatlands in mitigating climate change. No value is being put on the long-term carbon stores



Figure 29: Sheheree Bog, Co. Kerry, a pristine site up for sale in 2019 and passed over by the National Parks and Wildlife Service as it was not damaged. Photo: @ C. O'Connell

1 Judgment of Mr. Justice Garrett Simons delivered on 20 September 2019 in case 2019 No. 222 J.R. between FRIENDS OF THE IRISH ENVIRONMENT LIMITED (Applicant), MINISTER FOR COMMUNICATIONS, CLIMATE ACTION AND ENVIRONMENT MINISTER FOR HOUSING, PLANNING AND LOCAL GOVERNMENT IRELAND AND THE ATTORNEY GENERAL (Respondents)



Figure 30: Former industrial cutaway bog that is being managed for biodiversity and for the production of wind energy. Such sites need to be audited to determine whether the rehabilitation has made them climate proof. Photo: © C. O'Connell

contained within pristine peatlands, or their ability to sequester carbon as they function naturally (see Figure 29).

On the other hand does this policy imply that a far greater value is being placed on carbon emissions saved when damaged peatlands are restored? Such a policy can only be deemed satisfactory if a realistic funding stream is being provided by government for peatland restoration works on damaged peatlands of conservation importance. IPCC do not find this to be true. For example funding of €5 million was made from Carbon Tax revenue to undertake raised bog restoration in 2020. The National Parks and Wildlife Service themselves have indicated that a budget in the region of €1 billion will be required for peatland restoration¹. Given the scale of the damage to Irish peatlands and the pace of restoration on such a low budget the Irish Peatland Conservation Council have calculated that it would take 200 years to repair the existing damage to our network of peatlands of conservation importance. This would take us to the year 2220. Clearly the role of peatlands in accelerating climate change and helping to mitigate the effects of climate change is not being taken seriously.

Industrial Peatland Rehabilitation

With regard to industrial peatlands the government approved funding of €108m to Bord na Móna from the Climate Action Fund for the rehabilitation of 33,000ha of industrial cutaway bogs that were formally peat energy sites. The programme will take place from 2021-2025². Bord na Móna are providing €18m towards this project which will provide employment (310 jobs), enhance biodiversity, protect carbon stores (109m tonnes) and sequester 3.2m tonnes of greenhouse gases. The devil will be in the detail of this project which is to be monitored by the National Parks and Wildlife Service. Consideration of the carbon resilience of each rehabilitated site must get priority if such sites are to be prevented

from accelerating climate change. There is a lack of published information on the costs and methods being used to rehabilitate cutaway bogs so that they become climate resilient. In the interest of transparency, the public must understand the carbon savings being made through the enhanced rehabilitation proposed. The industry, being commercially driven favours rewetting in combination with other economic uses such as windfarm as seen at Mount Lucas (see Figure 30). The company recently announced that they are to raise €1.6 billion for a renewable energy programme which will supply one third of all Irish homes with renewable energy by 2030³. Bord na Móna Powergen have 14 renewable projects in play in 20204 as part of their renewable energy plan (see Figure 31).

Horticultural Peat Industry There has been much media coverage of the closure of the peat-fired power stations across Ireland recently in favour of generating energy from

1 Regan, S. (2020) An introduction to Irish peatlands: extent, pressures, conservation and value. Presentation to Backing Our Bogs Conference University College Dublin 21.7.20 2 Cabinet approves €108 million funding for ground-breaking Bord na Móna, rehabilitation plan. Department of the Envi ent. Climate and Comm action-projects/

3 https://www.bordnamona.ie/company/news/articles/bord-na-mona-to-raise-e1-6-billion-for-clima

4 Proposed Ballydermot Wind Farm Brochure 2020. Bord na Móna, Newbridge, Co. Kildare

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Figure 31: Overview of Bord na Móna Powergen projects as of 5th October 2020. Photo: © Bord na Móna²



Figure 32: Moss peat comes from drained carbon-rich bogs such as this site near Tyrrellspass, Co. Westmeath. 23,000ha of Irish peatlands are being mined for horticultural peat according to a review of the horticultural peat industry published in 2020^1 . Photo: © C. O'Connell

1 A Review of the Use of Peat in the Horticultural Industry: Key Issues Consultation Paper January 2020 2 Proposed Ballydermot Wind Farm Brochure 2020. Bord na Móna, Newbridge, Co. Kildare

low-carbon sources. This decision, though welcome, is completely undermined by the continued production of moss peat at numerous sites across the country, the majority of which operate outside of planning and licensing systems (see Figure 32). Over 3/4 of a million tonnes of horticultural peat was being exported from Ireland worldwide in 2018 from an area of 23,000ha of peatland¹. Bord na Móna, Bulrush, Clover, Erin Peat, Harte Peat, Klasmann-Deilmann Ireland and Westland are the major producers but there are 30 additional small producers¹.

The production of this product is regarded as an agricultural and not a mining activity. There is no carbon tax on it and in Irish garden centres bags containing moss peat are not properly labelled with their peat content or with a warning that its use destroys habitat and contributes to climate change. This is another example of a climate-killing policy that will prevent Ireland reaching its greenhouse gas reduction targets and which is destroying natural habitat. As most of the horticultural peat sites are still operating on an acidic peat substrate there is great potential for such sites to be restored using a combination of drain blocking, bunding and Sphagnum transfer.

For many years NGOs and leading professional gardeners including Monty Don have been advocating the use of peat-free composts as a campaign action to protect peatlands and all of the ecosystem services that they provide.

This work has stimulated the development of alternative peat free products. Bord na Móna has developed a Resource Recovery business which produces 31 peat free products from organic waste. It is ironic and disturbing that in 2020 Bord na Móna has been given over €100 million to rehabilitate peatlands formerly used for energy peat and at the same time the company is continuing to aggressively exploit other peatlands in its land bank to produce horticultural peat. The 2018 Annual Accounts of Bord na Móna¹ make the following statement in relation to its horticultural business "Our professional business - which is driven by our reputation for high quality Irish peat - is expected to continue its development with an expanding footprint in International markets". The Irish Government must bring horticultural peat production to an end immediately if its investment in cutaway bog rehabilitation is to be nothing more than a great swindle and waste of money.

Making the Switch

We need to make it easy for households to make the switch from burning turf to renewable energy. The map in Figure 33 shows the large number of homes burning peat in Ireland in 2016. Household peat burning caused 840,000 tonnes of CO2 emissions in 2018. Government must reduce the pressure on peatlands and climate from turf cutting and burning (Figure 34). The SEAI Better Energy Communities Programme is a national retrofit initiative aimed at upgrading buildings to high energy efficiency and renewable energy usage. The Midlands area which has a high dependency on turf for home heating is a target for this scheme. Although the scheme is available since 2018 and grants of up to 30% are available - which can be coupled with turf cutting compensation payments - uptake has been poor as the necessary renovations are disruptive to rural households. In addition solar power panels could be rolled out to provide electricity for homes,



Figure 33: Map of homes heated using peat in Ireland, from Census 2016. Photo: © https://www.reddit.com/r/ireland/comments/75zpav/map_of_homes_heated_using_peat_from_census_2016/



Figure 34: Destruction of peatland habitat and its natural carbon store for turf cutting for domestic use. A sustainable alternative must be found to remove this pressure. Photo: © C. O'Connell

reducing the need for supply from the national grid and helping to eliminate the burning of fossil fuels including turf to heat homes and provide hot water. Surplus energy generated in homes from the use of solar panels can also feed back into the grid, but this requires access.

1 https://www.bordnamona.ie/wp-content/uploads/2018/07/BNM-Annual-Report-2018.pdf

Funding for Private Restoration and Rehabilitation

The Irish Peatland Conservation Council does not see any funding streams at present being provided for private citizens who may wish to carry out rehabilitation and restoration works on cutover bogs that they own, in the interests of protecting their carbon store at the very least. Such work needs to be encouraged with well thought out programmes of investment and should be part of agricultural land management.

The recently launched Just Transition Fund by government has the potential to get local communities involved in conservation of the bogs in their community. The bogs might not be seen as fuel/summer grazing land only but as a vital carbon sink that can also provide employment in tourism, restoration and climate action.

Wind Farms and Bog Bursts

In 2020 alone media highlighted two bog slides or bursts relating to site preparations for wind farms in Shass Mountain/Drumkeeran, Co. Leitrim (see Figure 35) and in Meen Bog, Co. Donegal. For many years the Irish Peatland Conservation Council have raised concerns over planning applications to construct windfarms on upland blanket bog sites on the grounds of habitat loss through fragmentation and due to the climate crisis. In our submission to the Wind Energy Guidelines we found that the draft Wind Energy Guidelines 20201 placed too much emphasis on the developers and not enough on the protection of peatland habitats. No monitoring is being undertaken on windfarms developed on blanket bog habitat. If a peatland needs to be drained for a windfarm then the development is in the wrong place (Figure 36). If a windfarm is proposed on a designated site it is also in the wrong place. 90% of North Western Europe's wetlands have been drained and this has had an alarming outcome visible in the current climate catastrophe with flooding, increased rainfall, species extinctions and extreme weather all of which can cause

bog slides and significant spikes in greenhouse gas emissions not to mention loss of additional habitats, farmland and livelihoods¹.



Figure 36: Wind farms built on carbonrich peatlands lose their advantage in the fight against climate change. Photo: © C. O'Connell



Figure 35: Bog slide at Drumkeeran from Shass Mountain, Co. Leitrim. The bog burst due to works associated with a wind farm construction in 2020. Photo: © T. Moseley

Irish Peatland Conservation Council Submission on the Draft Wind Energy Guidelines 2020 (see http://www.ipcc.ie/wp/wp-content/uploads/2017/08/dWEG-2020_IPCC.pdf)