



National Peatlands Strategy

Terms of Reference

The Minister for Arts, Heritage and the Gaeltacht, Mr. Jimmy Deenihan, T.D. and the Peatlands Council has invited submissions from stakeholders, interested parties and the general public on the content and formulation of a National Peatlands Strategy for Government.

The Terms of Reference for the strategy have been set out; however, additional items of relevance not covered in these can be considered. Individuals/groups are invited to provide their views, opinions and ideas on all issues covered in the Terms of Reference and any other relevant matters not expressly covered.

The Terms of Reference of the Strategy are outlined below. Guidance and commentary on some of the key issues covered by the terms is further detailed as support information.

The Public Consultation on the Peatlands Strategy is being carried out with the independently chaired Peatlands Council and submissions can be made as follows:

By email: peatlandscouncil@ahg.gov.ie

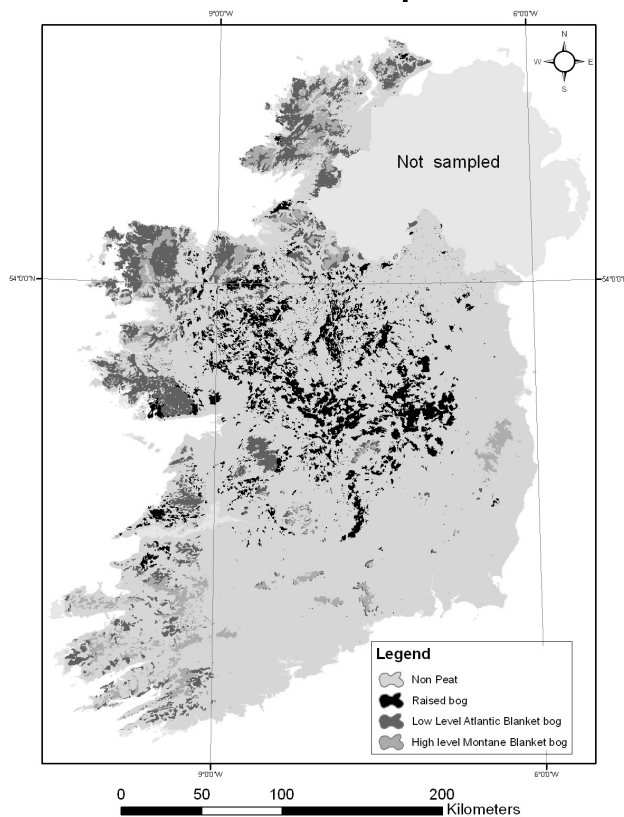
By Post: Secretariat
Peatlands Council
PO BOX 12070
Dublin 2

Enquiries: (01) 888 3207

The closing date for submissions is Friday, 16th December 2011. ** THIS DEADLINE HAS BEEN EXTENDED TO FRIDAY, 20th JANUARY 2012 **

It should be noted that all submissions received will be considered as part of the strategy development process but direct responses will not issue to each submission

Derived Irish Peat Map Version 2



Introduction

The recently published EPA Boglands Report describes Ireland's peatlands as the "last great area of wilderness, hovering between land and water, providing unusual habitats for their unique and specialist flora and fauna". In excess of 20% of Ireland's land mass is peat soil. [See map of the extent of Irish Peatlands from the EPA Boglands Report]

Ireland's peatlands have historically been used for a variety of purposes including agriculture, forestry, recreation, grazing, domestic and commercial turf cutting and wind farm development. These uses have and continue to be important socially and economically.

There is a very recognisable social value placed on domestic turf cutting in Ireland. The needs of those people involved in domestic cutting need to be formally addressed and it is important that in the

development of a national Peatlands Strategy, their needs are a key consideration. Turf-cutters, other peatlands users and the public as a whole should be involved in the formulation of a Strategy for the sustainable long-term management of Ireland's peatlands.

Turf cutting is only one part of a much larger picture of Ireland's peatlands. There are many issues to be considered in devising a strategy for the future use of our peatlands and the implications of various uses, socially, economically and environmentally. Issues that need to be considered include the protection of rare and threatened habitats and species, forestry, windfarm development, agricultural use, realising the value of peatlands as a national and local resource in terms of their potential as carbon stores, their potential as tourist and recreational amenities and their use in the regulation of water and the attenuation of flooding and drought. Ireland also has legal obligations under EU and domestic law to protect areas of our peatlands that have globally rare and threatened habitats and these necessitate the curtailment of certain activities in some areas. The broader impacts of peatlands use on other aspects of the environment also needs to be considered.

A New Government – A New Approach

In April 2011 the Government made a number of key decisions relating to the conservation and management of Ireland's peatlands, particularly those sites designated as Special Areas of Conservation and Natural Heritage Areas.

A commitment was made to draw up of a national strategy on Peatlands conservation and management, in consultation with bog owners and other stakeholders, to deal with long-term issues such as land management, restoration, conservation, tourism potential, carbon accounting and community participation in managing this resource.

At the same time, the independently chaired Peatlands Council was established to assist the Government and stakeholders regarding certain issues related to the management of Ireland's peatlands, in particular bogs designated as Special Areas of Conservation and Natural Heritage Areas, and in addressing the rights and needs of turf cutters.

Part of the Council's remit is to oversee and advise the Minister on the Peatlands Strategy, which is to be developed by the Department of Arts, Heritage and the Gaeltacht.

The Strategy is required to give direction to Ireland's approach to peatland management, including bog conservation and restoration, over the coming decades. This direction will be informed by a scientific review¹ which is being undertaken as part of the Strategy and by other relevant studies, including the recently published EPA Boglands Study.

This Strategy will consider the issues set out below. The Peatlands Council may also consider any other issues deemed appropriate and make proposals to include these in the overall strategy.

1. Land management

- a. the role of land purchase by the State to aid in conservation
- b. other management agreements or approaches,

2. Peatlands conservation & restoration

- a. differentiated approaches to SACs and NHAs
- b. a clearly resourced and prioritised schedule of restoration works to be undertaken for the 53 raised bog SACs
- c. an examination of the potential for landowners to take ownership of bog restoration with the guidance of the State and the potential for EU rural development funding supports to assist in meeting this objective

3. Regulatory Regimes which govern extraction

¹ The Peatlands Council Terms of Reference also includes a remit to oversee and advise the Minister on a scientific review of National Heritage Area (NHA) designations and the impact of turf cutting on raised bog habitats. This includes a review of available scientific evidence in relation to the effect of turf extraction on raised bogs. This review will include independent scientific advice from established Irish and international experts in the field of peatlands ecology. Such a review should also include an assessment of the 75 Natural Heritage Areas designated for protection under national legislation and on the appropriate protections for both NHA and SAC bogs having regard to the requirements of the Habitats Directive. The review should also consider practical approaches to restoration.

- a. planning and IPPC systems
- b. the regulation of the use of modern extractive machinery in the context of the requirements of the EIA and Habitats Directives and national regulations governing these activities.
- c. appropriate management of activities in raised bogs and blanket bogs designated as Special Areas of Conservation or Natural Heritage Areas, and the role and implementation of management plans
- d. The use of peatlands in the context of broader EU Law including the EIA, Water Framework and Floods Directives

4. National Code of Environmental Practice

- a. the potential for an agreed national code of environmental practice to include a re-examination of the position regarding raised bog Natural Heritage Areas

5. National and Community Benefits of Peatland Conservation

- a. the tourism potential of Ireland's peatlands as part of Ireland's overall green tourism product,
- b. the potential for community, voluntary and local authority participation in managing this conservation resource for the local community,
- c. carbon accounting and the potential of offsetting national emissions through re-wetting peatlands,
- d. the role of peatlands in the regulation of water and flood/drought alleviation

6. Financing and Funding Issues

- a. Funding for National and Local Projects (restoration)
- b. Compensation

Public Consultation - Guidance on Terms of Reference

1. Land management

Table 5-2.1. Distribution of Irish bogs (ha) in 2010 (sources from the National Parks and Wildlife Service (NPWS), Coillte and Bord na Móna).

Category	Total area (Hammond, 1981)	Protected peatlands	Protected near intact	Unprotected, of conservation value	NPWS ownership	Coillte ownership	Bord na Móna ownership
Raised	237,190	35,000	21,519 ²	28,481 ³	7,000	31,725 ⁵	5,302 ⁷
Blanket	765,890	182,063	143,248	34,536 ⁴	34,339	188,334 ⁶	7,383
Industrial cutaway	82,080 ¹	–	–	–	–	12,450	74,193
Total	1,085,160	203,582	164,767	63,017	41,339	232,509	86,878

¹Includes 74,110 ha of industrial cutaway raised bog and 7,970 ha of industrial cutaway blanket bog.
²Includes 1,945 ha of active bog (supporting a significant area of vegetation that is normally peat forming) (NPWS, 2007a).
³Total area of uncut high bog (50,000 ha) minus area of protected uncut high bog (21,519 ha) (NPWS, 2007a).
⁴Total area of blanket bog of conservation value (Malone and O'Connell, 2009) minus protected areas.
⁵Includes 570 ha of restored bogs.
⁶Includes 2,000 ha of restored bogs.
⁷Mostly hydrologically damaged but includes some restored areas. Bord na Móna sold nearly 7,000 ha of raised bogs of conservation value to the NPWS.

Source: EPA *Boglands* Report

The majority of Ireland's Peatlands are privately owned – as can be seen from the table above. These areas have historically been used for a variety of purposes including agriculture, forestry, recreation, grazing, domestic and commercial turf cutting and wind farm development. The strategy will need to recognise that these uses have and continue to be important socially and economically and that this is likely to continue for the foreseeable future.

The strategy will therefore need to include a consideration and review of the ownership and use of peatlands by private landowners and the scope for future economic activity by such landowners to include licensed peat extraction, rehabilitation, water management and such other uses as may be identified by the Strategy

Thus the heart of the Peatlands Strategy will be to make provision for the future wise use of designated and non-designated peatlands to accommodate the continuation of a wide range of uses and for the co-existence of these uses with appropriate protection of environmental resources and sites designated for conservation value. This requires a recognition that conservation measures will need to be set in a context of the aspirations and values of the stakeholders who own and manage the majority of Ireland's Peatlands.

The preparation of the strategies for land management will need to be informed by international best practice and standards – such as the International Mire Conservation Group & International Peat Society’s document *The Wise Use of Mires and Peatlands – A Framework for Decision-making*. Strategies developed by other member States may also be instructive.

Land management will cover a wide variety of the issues outlined in the strategy and is closely tied with peatland conservation and restoration, future land use, regulatory frameworks; agricultural, flooding and forestry issues and community involvement in peatland management.

In the development of the strategy the most suitable ways to manage peatlands into the future should be considered. In the past, the National Parks and Wildlife Service (NPWS) has implemented land/rights purchase schemes. These schemes served two purposes – 1. compensation of Landowners and 2. acquisition of land for future management by NPWS. The strategy must consider whether this is the most efficient use of State resources, especially considering the considerable sums of money spent on this to date and whether it meets turf cutters needs and/or desires, and whether it has contributed to a coherent approach to consolidation and conservation management

Long-term management agreements with individuals, local communities and/or turf cutting groups offers an alternative to land acquisition – this could involve recognising that local communities and their landowners are likely to be “the best guardians of the bogs” as well as being the group most likely to be able and entitled to derive income from the provision of environmental services.

2. Peatlands conservation & restoration

Around 20% of Ireland’s Peatlands are currently protected by designations with other areas that are of conservation value lying beyond these formally designated boundaries. The conservation of peatlands generally may need to be split between those peatlands designated under National and European habitat protection legislation (NHA and SAC) and those that require conservation in general terms.

Specific strategies for the conservation of raised and blanket bog NHAs and SACs require careful consideration in terms of their impact on owners and communities while also ensuring that Ireland’s legal obligations are met. Conservation strategies for Ireland’s peatlands need to be fully cognisant of international legal obligation (Environmental Impact Assessment, Habitats Directive, Carbon Emissions etc...) and public needs. Strategies adopted will need to dovetail with regulatory regimes and a national code of practice.

Due to the significant loss of active raised bogs habitat and Ireland’s alleged failure to meet obligations under EU Law, there will be a priority on the restoration of raised bog SACs in the first instance. However, the future management of raised bog NHAs, and designated blanket bog sites need also to be considered as a matter of urgency.

Landowner participation in the management of restoration programs should be explored so that landowners and local communities can take ownership of projects. Funding streams should be explored to support such projects in the various localities (e.g. EU Rural Development Funds).

The fear of bogs becoming wastelands and dumps should also be acknowledged and appropriate strategies to prevent this occurring should be considered.

3. Regulating the use of peatlands

A review of the Regulation systems in place is a fundamental requirement for future peatland management. The recently published BOGLAND project report (EPA) outlines that there is *“compelling evidence of the importance of Ireland’s peatland resource as a major carbon store, the role of natural (intact) peatlands as carbon sinks, the large GHG emissions from degraded peatlands...”*. It also outlines that peatlands are extremely sensitive to the management protocols put in place.

In that regard, the Planning Process, Integrated Pollution Prevention and Control licensing, Environmental Impact Assessment, Appropriate Assessment, Forestry Acts, Forestry Schemes, Farm Plan Schemes, the Single Farm Payment, Habitat Regulations and the Wildlife Acts play a key role in governing the use of Ireland’s Peatlands. However, it would appear that these regulatory frameworks have not been fully coordinated or successful in ensuring the satisfactory management of peatlands in Ireland. The Strategy should look at how these controls are being used and identify areas that require improvement to ensure the correct management of peatlands whether it is forestry, turf cutting, wind farm development, agricultural or other uses.

The impact on water quality should also be considered, particularly in relation to siltation, sometimes caused by mismanaged large scale peat extraction or inappropriate forestry practices on peat soils - while the potential interactions between restoration projects and the effects on the flood regimes of local river systems will also need to be fully evaluated to comply with the requirements of the Floods Directive.

It is clear that the use of peatlands is now being undertaken in an increasingly complex legal environment and any operation within peatlands needs to be cognisant of legal obligations under various Regulations and Directives such as – the Habitats and Birds Directives, Floods Directive, Water Framework Directive, Environmental Impact Assessment Directive, Strategic Environmental Directive and others.

Commercial exploitation of peatlands, such as the extraction of peat moss for use in horticulture and the use of peat in energy generation has impacted on Ireland’s peatlands and surrounding lands. The future of such industries is changing. The strategy should address these changes with a view to anticipating the effects on peatland use and potentials for their alternative use.

4. National Code of Environmental Practice

The continuing use of Peatlands for social and economic benefit will require the formulation and adoption of a code of practice by all involved that will be deemed to be effective, practical, and equitable. The Strategy will need to establish the scope and

mechanisms for the establishment of such a code of practice – in full consultation with all of the parties likely to be involved in the future use and management of Ireland's Peatlands.

The National Code of Environmental Practice may essentially be a combination of the most important aspects of the overall strategy but it will also include, as committed to by Government, a review of the NHA designations.

There should also be an ongoing long-term monitoring protocol put in place to revisit the strategy regularly and ensure that it continues to be relevant and meets national and local needs.

The strategy should also consider the role of public awareness and education in outlining the issues relating to peatland management and the various benefits of conservation and long-term sustainable management.

5. National and Community Benefits of Peatland Conservation

The Strategy could address the potential for some peatlands to be developed as tourist attractions in a managed way. As outdoor pursuits, healthier living and green tourism become more popular, there is a potential for some bogs and their surrounding localities to be marketed as tourist attractions. Any tourism development would require a visitor management plan to ensure the bog habitat is not disturbed or destroyed. This is an important consideration for any tourism development as identified in the EPA Bogland report. Clara Bog is one example of a site that has been developed and marketed as a tourist attraction including the development of a Visitor Centre in recent years.

The Strategy should look at ways and examples of developing these possibilities, determine the steps that need to be taken to develop sustainable tourism hotspots and long-term consistent income streams. The Strategy should also consider the potential for local communities to be a centre point of the development of tourism potential and ensuring that revenues generated are returned to the locality.

The EPA report states that "*Irish peatlands are a huge carbon store, containing more than 75% of all the national soil organic carbon*". It further goes on to state that the pre-requisite for a carbon store in peatlands is a high water table. The report also concludes that domestic and commercial turf cutting is a source of massive emissions of carbon; resulting from the loss of the carbon store (reduction in high water table), the physical act of cutting the turf and ultimately the burning of turf.

The Strategy should look at these matters with a view to outlining the long-term issues that need to be addressed and look at alternative sustainable fuel sources. The potential of offsetting emissions at a national level through re-wetting and restoration of peatlands needs to be considered. The strategy should look at the potential for surplus carbon credits (gained from peatland carbon stores) to be converted into sustainable revenue streams for the State and/or local communities / individual landowners

The impact on the carbon cycle of forestry in peat soils may also be considered as part of the Strategy.

6. Financing and Funding Issues

Significant long-term funding is required to ensure the future management of all aspects of Ireland's peatlands. The strategy should look at funding requirements for restoration, alternative fuel sources, where required, tourism development, costs of compensation for the cessation of turf cutting in certain areas and costs of restoration.

The Strategy should explore the potential of funding from the EU for localised restoration projects, funding for local tourism strategies and development and funding for pilot alternative energy projects.

Creative finance generating ideas and projects could be an integral part of the strategy.

Addressing the needs of turf-cutters

The needs and the voice of turf cutters who are being immediately affected by legal restrictions on the use of certain protected raised bog sites should be reflected in the strategy. After all, they are the people who are most directly affected by the need to protect the last remnants of raised bog habitat that we have in Ireland.

Their needs are being addressed through the Peatlands Council and the Department of Arts, Heritage and the Gaeltacht is operating a compensation scheme for those turf cutters who can no longer cut in designated raised bog SAC sites. The scheme offers a payment of €1,000 per annum (index linked) for 15 years or where feasible, the relocation of turf cutters to non-designated bogs where they can continue to cut turf. In the case of those turf cutters wishing to relocate, the Department will, on an interim basis, pay €1,000 per annum to the applicant or if preferred, provide a supply of cut turf (10 tonnes) delivered to their door each year, while relocation sites are being found and developed.

The independently chaired Peatlands Council, made up of turf cutting interest groups, Environmental Organisations, Bord na Móna and the Department of Arts, Heritage and the Gaeltacht, which was established in April 2011 provides a forum for discussion, debate and review of the needs of turf cutters in this situation. The Council, acting in an advisory capacity to the Minister for Arts, Heritage and the Gaeltacht is making progress on a number of key issues in this regard and is actively investigating and developing alternative options for turf cutters including funding for sustainable energy projects, the supply of turf, relocation to non-designated sites and other creative solutions.

The adequacy of these measures and structures could also be considered in drawing up the peatlands strategy and views of interested parties are also invited in relation to these issues.

Scientific Committee

The scientific aspects reviewed under the Strategy are to be overseen by a scientific committee representing experts from within and outside the State.

Peatlands Council

The Peatlands Council will have a key advisory role in the preparation of the Strategy. It is specifically required to oversee and advise on the content of the Strategy and facilitate debate and dialogue in relation to the issues which arise during its preparation.