

CONSULTATION

Response Document



**Mid-term review of the National Peatlands Strategy.
(Department of Housing, Local Government and Heritage)**

30 June 2021

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Northern Ireland Environment Link
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 260 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by our Ireland Policy Group.

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

Comments from CIEEM

In 2014, CIEEM welcomed the draft National Peatlands Strategy, and we are pleased to provide our perspective on the Mid-Term Review. In our 2014 submission, our main area of concern was that “the Principles and Actions lack quantifiable objectives and the Actions lack completion dates... furthermore, there is no timeframe for review or revision of the National Peatlands Strategy.” We are pleased that the Implementation Plan set out in the Review has addressed this concern.

In our comments on the then draft Strategy, we identified the use of ecosystem services as an overarching framework for peatland management as a key strength. Another was the Strategy’s inclusivity in gathering together the appropriate stakeholders in peatland management. We welcome the continuation of these approaches in the Mid-Term Review and the proposed Implementation Plan. In particular, we commend the “cooperation between Government Departments, State agencies and State bodies [the Strategy] has enabled”. We are concerned, however, at the absence of NGOs from actions where their input would be beneficial. Several NGOs, especially local community groups, have been very active in recent years in the promotion of peatland conservation, education, recreation, amenity and tourism. As they have significant on-the-ground experience in these areas, the meeting on peatland public awareness to be convened under Action R must include such groups. Similarly, the feasibility study on creation of a national peatlands/wetlands park in Action S should include consultation with relevant ecological professionals and NGOs.

One of the main objectives of CIEEM is the promotion of the science and practice of ecology. As such, we welcome the emphasis on improving the evidence base that is present in several Actions, especially upgrading land-use and habitat mapping systems (Action A), blanket bog SAC turf-cutting strategies and methods (Actions K and N), and assessing the application of land cover data as a resource for peatland management (Action O). Action B, however, must commit to ensuring that advice provided to DAFM to update the Prescribed Burning Code of Practice is based on research and evidence from practical experience. This evidence base must be wide-ranging and comprehensive. Furthermore, the Implementation Plan should clarify when the Code of Practice will be updated.

Action D appears insufficient to meet the original action in the Strategy. The wording as it stands refers only to ensuring the commitment is in the next Forestry Programme. This permits an unacceptable delay in the provision of much-needed guidance on forestry and peatlands. A firm commitment to deliver guidance during the lifetime of the Strategy is required. It should also be noted that guidance on future afforestation of peat soils in particular is likely to require specialist ecological input, as some peatland types, especially fens, can be difficult to identify using strategic-level or non-specialist surveys.

Action E on initiatives to increase delivery of ecosystem services is welcome, but the piecemeal focus on individual projects will not deliver on the ambition of the Strategy’s action A8. A more strategic and comprehensive evaluation of management options on State-owned peatlands is required. For example, Coillte is identified in the Strategy as the main State owner of peatlands, but none of the projects listed in Action E are listed as Coillte’s. The Peatlands Strategy Implementation Group should conduct a review of the condition of peatlands across all State owners, as well as their plans and projects to enhance biodiversity and ecosystem services, and identify where additional support may be needed to meet the Strategy’s objectives.

Lastly, Action T on research and dissemination is very welcome. We would further suggest that a review of the current state of peatland research and information gaps should be undertaken towards the end of the lifetime of this Strategy. This will provide a useful baseline for the preparation of the next National Peatland Strategy.

In conclusion, the Mid-Term Review of the National Peatlands Strategy addresses many of the shortcomings of the Strategy in its original form. The Strategy and Review are based on a foundation of past and ongoing research and practical experience to which CIEEM members have significantly contributed. Therefore, CIEEM is well placed to advise on peatland conservation and management now and in the future. We would welcome any opportunities to discuss further the Mid-Term Review.

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