

CONSULTATION

Response Document



**NI Peatland Strategy Consultation
(Department of Agriculture, Environment & Rural Affairs)**

1 September 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.

General Comments from CIEEM

We welcome the NI Peatland Strategy 2021 -2040 and agree with DAERA that the UK Peatland Strategy 2018 provides a robust basis for peatland conservation across the devolved administrations. A focus on restoration of this important habitat and prioritisation of target areas for restoration

offers great potential for a successful strategy. However, the draft strategy falls short with significant omissions and will not provide for full protection of peatlands since the strategy commences with a narrow description of peatland areas that it addresses.

Since the then Department of the Environment published 'Conserving Peatland in Northern Ireland', as little as 1% of peatlands have been restored. To date, 86% of our peatlands have been damaged by pressures including drainage, overgrazing, afforestation, burning and extraction in lowland areas. As a result, many of our peatlands are net emitters of greenhouse gases (RSPB 2021).

The Office for National Statistics estimate that the monetary benefits, in terms of greenhouse gas emissions, of achieving the Committee on Climate Change's scenario of having 55% of peatland in good status, are in the order of £45 to £51 billion over the next century. This is considered conservative as it does not include the degraded peats under agriculture (Trenbith and Dutton 2019).

Peatlands are our largest natural carbon stores and it is important to slow and eventually halt greenhouse gas emissions, including through raising water tables, stopping burning and removing planted trees (Gregg et al. 2021).

A clear commitment to conserve and restore state owned peatlands that deliver, or have the potential to deliver, significant ecosystem services is needed. Such an overarching commitment will embed an ecosystem approach in peatland management and will provide leadership for private landowners.

We are concerned there is no commitment to prevent further peat extraction, simply an action to conduct a review on the potential for a ban on peat extraction on all publicly owned land.

Similarly there is no commitment to fund the strategy which is critical to ensure success. Scotland, Wales and England have all made funding commitments and set restoration targets and Northern Ireland needs to make similar commitments and include SMART targets.

We welcome the development of the Peatlands Partnership but would stress the need to include eNGOs, scientific experts, professional ecologists and environmental managers and all stakeholder groups. Local community engagement and involvement at the outset is essential to shift perception to a culture of peatland awareness, understanding and appreciation.

Overall the Strategy is not ambitious or comprehensive enough to ensure protection of these irreplaceable habitats. In addition the lack of ambition will mean key opportunities to address climate change commitments will be missed. Such an approach will ensure further degradation of peatlands and accrue additional peatland restoration and climate adaptation costs for society.

Consultation Question Responses

1. Do you agree with the scope of the strategy?

No

Comments:

The scope is too narrow, all peatland needs to be included given their importance for biodiversity and as peatlands hold a significant carbon store.

The scope of the strategy only “includes peatland with semi-natural vegetation and peat soils that can be prioritised for restoration to peatland with semi-natural vegetation”.

Semi-natural vegetation is defined in the strategy as “vegetation impacted by deliberate or inadvertent human disturbance, but which has recovered to such an extent that species composition and environmental and ecological processes are close to its natural state”. Consequently this is a high standard to meet and given the long term persistent damage and neglect of peatland this is likely to exclude a major proportion of peatlands across NI.

In terms of peat soils the scope refers to the prioritisation for restoration to peatland with semi-natural vegetation and given that little is known about the condition of a significant proportion of the semi-natural peatland resource which lies outside the network of designated sites and that as much as 86% of peatlands are damaged, the scope is too narrow.

Furthermore the 2018 condition assessment for protected peatland sites, including European and Nationally important sites, outlined that a high proportion are in unfavourable condition, therefore it is likely then that the focus of the strategy will be on designated sites and will not meet NIs biodiversity and climate commitments.

The peatland strategy should include all peatlands in the state, then with the prioritisation to follow. In addition to the other ecosystem services they provide, peatlands can contribute to either storage or release of greenhouse gases no matter what level of human disturbance they have been subjected to. For example there are large areas of peat soil stored under existing agricultural and urban areas. Disturbance and extraction of these soils will contribute to carbon emissions and could impact on water storage capacity of a landscape therefore all peatland soils should be accounted for.

2. Do you agree with this vision?

No

Comments:

The Vision “is to ensure that all semi-natural peatlands are protected, managed and where possible, prioritised for restoration, so that they can maintain their natural functions, biodiversity and ecosystem services.”

The insertion of the criteria of semi-natural peatlands potentially excludes a major component of the NI peatland resource. We suggest alignment with the UK Peatland Strategy 2040 Vision of “Our peatlands are protected, enhanced, sustainably managed and are recognised for their intrinsic value and the public benefits they provide”. This is a more comprehensive and inclusive vision which NI should align to. This would demonstrate government commitment to these world class assets overlooked for too long. We do however support direct commitment to protecting biodiversity associated with peatlands.

3. Do you agree with the aim of the strategy?

No

Comments:

Naturally, there must be prioritisation of resources, however, we again note the inclusion of semi-natural peatlands potentially excludes significant parts of the peatland resource. Consequently, the strategy misses major opportunities to address climate change and biodiversity loss.

The UK Strategy (2018) has set a 2040 Target of “two million hectares of peatland in good condition, under restoration or being sustainably managed by 2040.” Northern Ireland should similarly set SMART targets with measurable outcomes and action completion dates. Without quantifiable objectives and targets the success or otherwise of the strategy cannot be properly evaluated.

NI should set appropriate targets based on the overall peatland cover in NI. First of all this should be identifying the total area of peatland resource in the state, the context and condition of that resource, and short, medium and long term aims for each resource. This should include maintenance of existing good condition habitat, restoring poor condition habitat and identifying the best possible long term state for peatland in a specific context and condition.

4. Do you agree with Strategic Objective 1?

No

5. Do you agree that the actions listed will ensure that Strategic Objective 1 is achieved?

No

Given the paucity of data on the condition of the peatland resource across NI, it is not possible to assess the likely effectiveness of the listed actions. For example there is not complete data for Article 17 reporting which is based largely on 20/30 year old data. The first step needed is to identify the extent of peatland habitats, including depth, condition and whether it is being extracted or affected by other damaging activities.

The UK Strategy contains a more comprehensive Objective to “Bring about the long-term preservation, enhancement and sustainable management of peatlands in areas that support:

- i. semi-natural mire plant communities and
- ii. other semi-natural vegetation on peat soils (e.g. heath) through:
 - a. Maintaining and enhancing a suite of local, national and international level of protected areas for biodiversity alongside wider measures to ensure the favourable status of peatland habitats and species across their range
 - b. Conserving functional ecosystem units as the building blocks for habitat networks
 - c. Preventing damage from development and conflicting land management
 - d. Ensure the full long-term costs of potentially damaging activity is properly taken into account during the decision making process.

Objective 1 of the NI strategy only includes peatlands supporting semi-natural vegetation as relayed earlier this is a stringent criteria which will likely omit significant areas of the peatland resource. A similar comprehensive objective is needed to conserve peatlands and prevent further degradation of these irreplaceable habitats.

There is a need to ensure the environmental assessment processes are designed to assess full long term costs to carbon, water and biodiversity.

Comments on the identified actions for Objective 1

Action 1 - we welcome the action to “*compile a NI Peatland Asset Register which will quantify distribution, type, condition, current management practices, potential threats and restoration potential of semi-natural peatland and associated peat rich soils.*” We would however indicate that this action is not a simple compilation exercise and needs to be underpinned with up to date specialist surveys including vegetation and hydrological assessments to determine condition, depth and restoration potential.

The Asset Register should include all peatland assets in the country and should not be limited to semi-natural vegetation. There are significant areas of depth of peat soils under improved agricultural land or made ground which could be managed, restored or retained in situ to provide ecosystem services.

Action 2 - We would also highlight that Conservation Management Plans need to be funded and resourced to ensure positive management.

Action 3 - We welcome the identification and declaration of new peatland ASSIs.

Action 4 and 5 - The use of peat in horticulture has been banned in other states. Peat use in the amateur horticultural market should be phased out quickly as there are already a range of peat-free products on sale. In a phase out of use in the professional industry, affected practitioners should be supported in efforts to transition to peat-free products. Where possible, existing peat-harvesting facilities could be converted for the processing of peat-free products (e.g. domestic green waste), to prevent job losses. Priority action 4 and 5 seem to be inextricably linked. The historical context of peatland use should be recognised but any such review should be set in the context of the now accepted multiple ES provided by peatlands.

Action 8 - We support the development and implementation of the Ammonia Strategy which again will also need to be adequately resourced. The Ammonia Strategy will also require smart targets and should be subject to consultation with bodies and researchers in this area.

6. Do you agree with Strategic Objective 2?

No

7. Do you agree that the actions listed will ensure that Strategic Objective 2 is achieved?

No

Comments on Strategic Objective 2:

Objective 2 refers to the restoration of degraded areas to functioning peatland ecosystems. It is not known what is meant by ‘degraded areas’ as these are not defined in the document, however, when

taken in the context of the strategy scope there is potential to omit large areas of peat soils especially more challenging sites which have been severely damaged.

The UK Strategy commits to “restore peat ecosystem function and enhance biodiversity through the restoration and ongoing sustainable management of upland and lowland peatlands that no longer support semi-natural vegetation but would have

- (a) Remaining deep peat resource including mineral workings, deep drained, improved grasslands and closed canopy forestry plantations.
- (b) An adjacent semi-natural peatland site that depends on the degraded area coming under restoration management.

Safeguard restorable peatland areas from development and land management activity that would undermine restoration potential.

Optimise UK carbon efficiency by co-ordinating forest management, renewable energy development and peatland conservation through planning to ensure positive outcomes for all.”

Similar definitions and a clearly defined Objective for restoring degraded peatlands are required within the NI Strategy.

The UK Strategy includes the outcome that 80% of heavily degraded peatland are under restoration management aimed at recovering long-term security of the ecosystem. Given that 44% of the state forest is on peat soils, there is a major opportunity for DAERA to demonstrate leadership in restoring afforested peatland. Removing forestry on peat and restoring hydrology is key for both biodiversity and carbon wins.

Comments on the identified actions for Objective 2

Action 10 - Peatland Restoration sites should be evaluated and developed through SMART targets on a short, medium and long term basis to maximise resources. There should be a clear decision making framework to identify sites or situations on priority for action. How are decisions based - on economic terms, biodiversity conservation, flooding, carbon, or is the assessment applying a full natural capital approach including valuing the intrinsic value of peatlands.

Action 11 - We welcome and support the development and implementation of Restoration Plans for peatland sites outside the Designated Site Network. However, as outlined previously, there needs to be SMART targets with quantifiable outcomes with funding secured to deliver.

Action 14 - A SMART target should be set to restore afforested peat sites.

8. Do you agree with Strategic Objective 3?

No

9. Do you agree that the actions listed will ensure that Strategic Objective 3 is achieved?

No

Comments on Strategic Objective 3:

As above - It is not known what is meant by degraded areas as these are not defined in the document and the Strategy Target only refers to “high priority degraded peatlands in NI are under sustainable management” hence there is significant potential to omit large areas of peat soils.

The UK Strategy includes the outcome that 80% of heavily degraded peatland are under restoration management aimed at recovering long-term security of the ecosystem and sustainable management practices adopted on 80% of UK peatlands. Similar ambitious outcomes are required for the NI Strategy.

Comments on the identified actions for Objective 3

Action 16 - We support the inclusion of the development of Land Management schemes which provide support to underpin appropriate management of all peatlands. Valuing the multiple ecosystem services provided by habitats, in this case peatland, should include a system of publicly funded support which recognises their multifunctionality. This peatland strategy provides the opportunity to identify all the ecosystem services that this suite of habitats provides, thereby helping to move away from a traditional approach which values peatlands for one or two purposes (namely food and fuel provision) and promotes their management to multiple benefits. We should support innovative management techniques and funding mechanisms to manage peatlands restoratively/sustainably and appropriate management should be informed by evidence on ecosystem services and consider long term benefits for carbon, air, water and biodiversity.

Land managers who manage peatland sustainably should be appropriately supported and, conversely, funding for activities which are damaging peatland habitats must be avoided. Unfortunately, there are no specific actions to improve farming practices on peat soil to slow the loss of soil carbon. Actions should be included on soil management regimes and on adaptive management.

Actions 21-23 - These actions should seek to be as ambitious as possible as previously mentioned for Actions 4 and 5.

10. Do you agree with Strategic Objective 4?

Yes

11. Do you agree that the actions listed will ensure that Strategic Objective 4 is achieved?

Yes

Comments on Strategic Objective 4:

We welcome the inclusion of research on Nitrogen Deposition, Action 29 and alternative growing media (Action 32).

As a professional society for practicing ecologists and environmental managers, CIEEM welcomes the inclusion of research and urges that the implementation of the strategy at all stages should be guided and underpinned by evidence. Particular aspects of peatland management that require strong scientific backing include any use of controlled burning, peatland afforestation, after use plans of cutaways and guidance for windfarms on peatlands especially regarding impacts and impacts of land practices on water quality and carbon stocks/balances.

The Strategy should however go further with additional research on peatlands including peatland restoration and rehabilitation, baseline fen research, and research on greenhouse gas emissions of peatlands under various management including afforestation.

12. Do you agree with Strategic Objective 5?

Yes

13. Do you agree that the actions listed will ensure that Strategic Objective 5 is achieved?

Yes however access on peatland sites needs to be carefully planned, assessed and managed.

14. Do you agree with Strategic Objective 6?

Yes

15. Do you agree that the actions listed will ensure that Strategic Objective 6 is achieved?

No

Unfortunately there is no commitment to funding the NI peatland Strategy without such a commitment the actions required to deliver an ambitious Peatland Strategy for NI will not be achieved. The other devolved administrations have made public funding commitments for peatland restoration and NI should also.

16. If appropriate, please provide any final comments you may have on the Draft Northern Ireland Peatland Strategy 2021-2040.

N/A

References

R Gregg, J. L. Elias, I Alonso, I.E. Crosher and P Muto and M.D. Morecroft (2021) Carbon storage and sequestration by habitat: a review of the evidence (second edition) Natural England Research Report NERR094. Natural England, York

Rouquette, J. Morris, J. & Middleton, A. (2021) Valuing our Peatlands: Natural capital assessment and investment appraisal of peatland restoration in Northern Ireland. RSPB Northern Ireland Report.

Trenbirth, H. & Dutton, A. 2019. UK natural capital: peatlands.

<https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalforpeatlands/naturalcapitalaccounts>.

Chartered Institute of Ecology and Environmental Management

43 Southgate Street, Winchester, Hampshire, SO23 9EH, UK

Tel: +44 (0)1962 868 626 | enquiries@cieem.net | www.cieem.net

Company Number: RC000861

Registered Charity Number (England and Wales): 1189915