



National Peatlands Strategy

Response to Public Consultation from Mountaineering Ireland

January 2012

1. Introduction

Mountaineering Ireland (MI) welcomes the Minister's commitment to the preparation of a National Peatlands Strategy and the opportunity to contribute to this consultation process.

In a UK study published in 2011, the International Union for the Conservation of Nature described peatlands as '*the Cinderella habitat: overlooked and undervalued*' (Bain et al, 2011, p.93). This is also true in the Irish context, peatlands represent a vast natural resource, with peat soils covering 20.6% of the national land area, however virtually all of this has been degraded leaving a disproportionately small amount of near-intact peatland (Renou-Wilson et al, 2011, p.40). Careful future management of this resource is critical.

As the national representative body for hillwalkers and climbers, MI's main peatland concern is blanket bog, particularly mountain blanket bog.

2. Mountaineering Ireland

MI is the representative body for hillwalkers and climbers on the island of Ireland. MI is recognised as the National Governing Body for the sport of mountaineering by both the Irish Sports Council and Sport Northern Ireland. The term mountaineering refers to a spectrum of activities that includes hillwalking, rock and ice-climbing, rambling, bouldering and alpinism. MI has 10,500 members comprising 153 clubs and over 1300 individual members (December 2011).

The work of Mountaineering Ireland includes:

- Representing the interests of hillwalkers and climbers;
- Providing a comprehensive range of services to members;
- Improving and securing access to Ireland's hills and crags;
- Promoting conservation and responsible use of the mountain environment;
- Encouraging safe practice and promoting skills and leadership training.

3. Response to Terms of Reference

3.1 Importance of blanket bogs

The EPA's BOGLAND report estimates that 36.7% of peat soils correspond to raised bogs, with 22.7% high-level mountain blanket bog and 40.6% (the highest proportion) low-level Atlantic blanket bogs (Renou-Wilson et al, 2011, p.40). The Republic of Ireland has 8% of the world's blanket bog, making Ireland the most important country in Europe for this type of habitat (O'Connell, 2002).

The impetus behind the formation of the Peatlands Council centred on the controversy over the cessation of turf-cutting on raised bogs, MI is concerned that this has influenced the terms of reference for the National Peatlands Strategy and would like to see greater emphasis on blanket bogs in the framing and development of the strategy.

3.2 Land management

Most of Ireland's peatland resource is in private ownership, and in the short to medium term the State's ability to purchase additional blanket bog for conservation will be limited, therefore it is important that the National Peatlands Strategy identifies mechanisms for the management of blanket bog in conjunction with private landowners.

Options for an upland agri-environment scheme focused on the sustainable management of near-intact blanket bog should be explored in the current discussions on the next CAP programme. This should cover both designated and non-designated blanket bog. The scheme should be developed with the input of farmers, combining their understanding of the hills with scientific knowledge, as was done with the BurrenLIFE project (Silva et al, 2011, pp.9-11). Payment to farmers should be contingent on the achievement of agreed conservation objectives.

The state already owns a considerable amount of peatlands. This land-bank should be assessed to identify conservation-worthy peatlands that could be managed or restored in a way that would identify and demonstrate best-practice in peatland management. A significant proportion of Ireland's peatland, particularly blanket bog, is in Coillte's ownership. In light of the current debate about the possible sale of Coillte, or its timber, MI emphasises the importance of fully retaining Coillte's estate (7% of Ireland's land area) in public ownership, for the common good. In some areas it is likely to be more beneficial not to replant felled plantation and to manage the land for its carbon, recreation and landscape value instead.

3.3 Peatlands Conservation and Restoration

The National Peatlands Strategy should incorporate the learnings from Coillte's LIFE-funded project to restore active blanket bog at 20 sites within SACs (Coillte, 2008). Experience from the UK, where there have been several successful peatland restoration projects, shows that peatland restoration is cost-effective in reducing carbon emissions, improving water quality and conserving biodiversity (Bain et al, 2011, p.12). The role of conservation NGOs in the UK Peatland Programme is notable; MI believes such partnership arrangements should be considered in Ireland.

3.4 Regulatory regimes which govern extraction

Damage by off-road vehicles

MI suggests the heading for Section 3 should be broadened, as in addition to extraction, there are many other damaging activities taking place on designated peatlands, which are not being effectively tackled. One that is of major concern to MI is the damage being caused to blanket bog by irresponsible recreational use of off-road vehicles (*see Appendix 1*).

Despite the introduction of new regulations in 2010 banning the use of off-road vehicles in 13 protected areas (S.I. No. 293 of 2010), it seems the Birds & Habitats Regulations 2011 (S.I. No. 477 of 2011) may have weakened the mechanisms to prosecute those who damage protected areas. Under the 2010 regulations action could be taken if an authorised officer believed an activity was '*likely to damage the site*', whereas the 2011 regulations require

that the activity is '*likely to have a significant effect on, or adversely affect, the integrity of*' the site.

Reduced staffing levels in the NPWS mean that rangers are rarely on duty at the weekends when most damage from the recreational use of off-road vehicles occurs. MI urges the Minister to launch targeted patrols in problem areas, with the support of the Gardaí. This should be supported by publicity and signage highlighting this offence and the penalties that it carries.

Completing the designation process

In the context of the National Peatlands Strategy, MI calls on the Minister to complete the process of designating SACs, SPAs and NHAs, so that these areas have full legal protection. The designation of unprotected peatlands deemed to be of conservation value (c63,000ha) should be an immediate priority, so as to prevent further loss or degradation of this special habitat. In addition, the Minister should ensure that a management plan is prepared, and its implementation initiated, for every SAC, SPA and NHA within a timeframe of less than five years.

To date, Ireland has failed to address a range of damaging activities on 'protected' peatlands, with the result that the quality of Ireland's peatland resource, which is important in global terms, has been significantly affected. It is imperative that this does not continue; peatland is a particularly fragile and vulnerable habitat type; legal and practical mechanisms must be put in place for its effective protection.

3.5 National Code of Environmental Practice

The guidance notes for Section 4 incorporate a code of practice (presumably to do with turf-cutting), a review of NHA designations, review of the National Peatlands Strategy and public awareness. It is not clear how these elements inter-relate, and it would seem that the review of NHA designations should be considered under Section 3, rather than Section 4.

The EPA's BOGLAND report (p. 45) notes that the negative impact of trampling on peatland is exacerbated by lack of a visitor management plan and poor public awareness. MI wishes to draw the Council's attention to the Leave No Trace programme, which promotes responsible recreational enjoyment of Ireland's natural environment in a way that is based on people understanding the impact of their actions and taking personal responsibility to care for the environment.

Strategic visitor management in busy protected areas, and investment in recreation infrastructure (e.g. trails), is essential to ensure that the increased popularity of outdoor recreation does not place undue pressure on peatland habitats. While boardwalks might seem the obvious solution when trails are required to manage peatland erosion, other options should be examined. Boardwalks are visually intrusive, particularly in upland areas and require considerable ongoing maintenance. In areas of shallow peat, reversal trails provide a low-cost alternative, while on deeper peat floating paths using a geo-textile base can work well. On steeper ground stone-pitching may be required. In all trail development,

the design of the trail, choice of materials and quality of construction has a great bearing on the success of the trail in managing visitor pressure. Putting appropriate infrastructure in place facilitates public connection with peatlands. In tandem with education initiatives, this will build public understanding and appreciation of Ireland's peatland resource.

3.6 National and Community Benefit of Peatland Conservation

Tourism and recreation

Section 5 in the terms of reference notes the tourism potential of Ireland's peatlands. While there is undoubtedly tourism potential associated with peatlands, this will only be sustainable if protection of the natural environment is given priority over economic factors. The adoption of ecotourism principles and the incorporation of an education programme should be integral to any peatland tourism initiative. The principles adhered to by the Burren Ecotourism Network provide a positive example (see www.burrenecotourism.ie). Such initiatives should also draw on the educational resources and the experience of the Irish Peatland Conservation Council.

MI believes the terms of reference, and the National Peatlands Strategy, should make reference to the *recreation* value of peatlands. Mountain blanket bog hosts a variety of low-impact recreation activities, particularly hillwalking. While the direct economic benefit of recreation may be less than tourism, there are considerable physical and mental health benefits for participants, which in turn deliver savings in healthcare costs, the justice system and national productivity.

Landscape and other ecosystem services

Blanket bog is a key element in Ireland's upland landscapes, providing some of our most beautiful scenery and our largest areas of relatively wild land. The richness, vastness and myriad colours of peatlands have inspired writers and artists for generations, as shown recently by Minister Deenihan's painting of bog cotton on Ennismore Bog, which makes a fitting cover image for Ireland's current Biodiversity action plan. The cultural significance of peatlands extends well beyond the practice of cutting turf.

Wind farm development has a disproportionate impact on upland landscapes, due to the relatively wild and undeveloped character of the hills and the dominance of turbines over the surrounding area. Wind farm development introduces a large-scale industrial use to an otherwise natural landscape. The negative impact of wind farm development on peat stability has been well documented following the Derrybrien bog burst in 2003.

Landscape is but one of many ecosystem services provided by Ireland's peatlands. The BOGLAND report identified a clear information deficit regarding the ecosystems services of peatlands. MI urges that the National Peatlands Strategy provide a comprehensive assessment of the multiple benefits delivered by Ireland's peatlands, including amongst others, landscape value, carbon storage, biodiversity, recreation, supply of drinking water and flood alleviation.

4. Closing comments

In conclusion, MI requests that the National Peatlands Strategy should focus on Ireland's overall peatland resource, by placing greater emphasis on the protection of our blanket bogs.

Ireland's peatlands are a major element within our natural heritage, which we have a duty to protect for future generations. Promoting better understanding of peatlands and allied to that, sustainable recreational enjoyment of these areas, will help ensure public support for peatland protection. Resources will need to be allocated to the protection of designated areas, however a full analysis of the ecosystem benefits we derive from peatlands will justify the necessary investment. In considering the future management of Ireland's peatland resource, MI encourages the Minister and the Peatlands Council to explore innovative solutions involving private landowners, NGOs and local communities working in partnership with statutory bodies.

We trust you will take MI's views into consideration. We look forward to contributing to further public consultation on the National Peatlands Strategy, and to playing our role in the care of Ireland's peatlands.

5. Further information

MI would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

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6. References

Bain, C.G. et al (2011) *Commission of Inquiry on Peatlands*, published by the IUCN UK Peatland Programme, available online: <http://www.iucn-uk-peatlandprogramme.org/commission/findings>

Coillte (2008) *Restoring Active Blanket Bog in Ireland: Technical Final Report*, published by Coillte Teoranta, available online: <http://www.irishbogrestorationproject.ie/>

O'Connell, C. (2002) *Information Sheet on Blanket Bogs*, published by the Irish Peatland Conservation Council, available online: <http://www.ipcc.ie/infoblanketbogfs.html>

Renou-Wilson, F. et al (2011) BOGLAND: Sustainable Management of Peatlands in Ireland, published by the Environmental Protection Agency, available online: http://www.epa.ie/downloads/pubs/research/land/name_31495,en.html

Silva, J.P. et al (2011) *Best LIFE Nature Projects 2010*, published by the European Union, available online: <http://www.burrenlife.com/Userfiles/best-life-nature-projects-2010.pdf>

Appendix 1

Examples of off-road vehicle damage in Wicklow Mountains SAC



1. Ballinguilehill, Wicklow Mountains SAC



2. *Lybagh, Wicklow Mountains SAC.*



3. *Slievemaa summit, Wicklow Mountains SAC.*