

# Response ID ANON-JXUZ-QRCE-V

Submitted to Northern Ireland Peatland Strategy 2021-2040  
Submitted on 2021-08-31 14:55:17

## Introduction

1 What is your name?

Name:  
Malachy Campbell

2 What is your email address?

Email:  
malachy@nienvironmentlink.org

3 What is your organisation?

Organisation:  
Northern Ireland Environment Link

## Scope of the Northern Ireland Peatland Strategy 2021-2040

4 Do you agree with the scope of the strategy?

No

5 If appropriate, please provide any further comments you may have on the scope of the strategy.

Do you have any further comment on the scope of the strategy?:

According to the consultation, the scope of the strategy “includes peatland with semi-natural vegetation and peat soils that can be prioritised for restoration to peatland with semi-natural vegetation, whether publicly or privately owned.” If the department is unsure of the extent and quality of peatlands in NI, NIEL is unclear why the scope of this draft strategy is limited (to semi natural peatlands) from the start?

The scope outlined in the strategy raises an obvious question as to whether or not intact, pristine or near natural peatland areas are also included in the strategy? NIEL believes that such areas should be included in the strategy but the consultation document is not clear on that. In fact, NIEL would argue that all peatland should be covered by the initial scope of the consultation. Since the first of the priority actions proposed in the survey is for a NI peatland asset register to be compiled then if this register is appropriately comprehensive, it would seem appropriate to base future decisions on peatland management on the information provided by the register and not to limit the scope of the draft strategy at this early stage. It would be understandable that some areas initially included may turn out to be not worthy of inclusion at later stages but that it would be better to include all potentially appropriate sites initially rather than to limit the initial scope of the strategy and omit potentially important peatlands.

## Vision of the Northern Ireland Peatland Strategy 2021-2040

6 Do you agree with this vision?

No

7 If appropriate, please provide any further comments you may have on the vision of the strategy.

Do you have any further comment on the vision of the strategy?:

According to the consultation “the vision of this Strategy 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.” As outlined in our response to Q5, it is not clear that intact, pristine or near natural peatland areas are also included. NIEL believes that not only should such areas be included but those areas would be a priority for protection. On the basis that NIEL believes that all peatland should be covered by the initial scope of the consultation then NIEL would describe the scope of this consultation as inappropriately limited.

## Aim of the Northern Ireland Peatland Strategy 2021-2040

8 Do you agree with the aim of the strategy?

No

9 If appropriate, please provide any further comments you may have on the aim of the strategy.

Have you any further comment on the aim of the strategy?:

The strategy is seriously lacking in ambition with deadlines far too far in the future. The language used in the consultation is vague and weak. There is a noticeable lack of strategic thinking, most notably in relation to target setting - often there are no dates attached to priority actions - and a lack of recognition of the need to integrate with other relevant strategies, policies and commitments.

NI is currently facing a climate emergency and a biodiversity crisis. On 3rd February 2020, this was officially recognised by the NI Assembly which stated that NI is "facing climate breakdown and a biodiversity crisis". In light of this, it is important that NI's response to both crises is based on the best available scientific evidence and that the links between both are properly accounted for. The evidence in relation to climate change in particular has moved on significantly even since 2018. As such NIEL regards the proposal that "The overarching aim of this Strategy will be to ensure that, where possible, all semi-natural peatlands in Northern Ireland are conserved or restored to healthy, functioning ecosystems by 2040 and that the ecosystem services that they provide are acknowledged and appreciated." as inappropriate as it is weak and far too slow.

More detail is given below on some of the most recent advice and evidence from groups such as the UK Climate Change Committee (CCC) but one example is the advice of the CCC as outlined in its 2020 report 'Land Use: Policies for a Net Zero UK'. On page 15 of that report, the CCC made recommendations in relation to both upland peat and lowland peat, one of which was to mandate all upland peatland within a SSSI was to be under restoration before 2023. The CCC listed DEFRA and the equivalent bodies in Scotland, Wales and NI as being responsible for this so it is reasonable to interpret this as meaning the CCC recommend this should happen in NI in ASSIs. Yet according to the NI peatland strategy consultation one of the targets for Strategy Objective 2 is for all high priority degraded peatlands to be under restoration management by 2040. So, not only is the NI draft target limited only to "high priority" degraded peatlands, but the NI peatland strategy is proposing a target in NI is achieved 17 years later than the date by which that target is meant to be achieved across the UK, according to the CCC. Similarly, on the basis that the first of the priority actions under strategy objective 2 is to "Compile a list of potential Peatland Restoration Sites to action and a decision making framework for investment by 2022." then it is unclear why the consultation is proposing to take another eighteen years to have not even all peatlands but only high priority degraded peatlands under restoration management.

The very long time frame for these and other targets is unacceptable. The NI peatland strategy needs to be much more ambitious, clear, strategic, SMART and integrated with other relevant strategies, policies and commitments in NI and the Republic of Ireland. NIEL believes that in effect peatland conservation and restoration in NI should be as near to completion as possible by 2030.

## Strategic Objective 1

10 Do you agree with Strategic Objective 1?

No

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

No

12 If appropriate, please provide any further comments you may have on Strategic Objective 1 or the associated actions.

Do you have any further comment on Strategic Objective 1 or the associated actions?:

The priority actions listed are unlikely to ensure strategic objective 1 is achieved primarily because there are no target dates given for the actions listed but also because the actions are mainly based on the publication of various documents described as plans, papers, registers and strategies. NIEL accepts that as part of the process of implementing a plan, that plan will need to be agreed and written down. However, the mere publication of a plan does not ensure the achievement of the goal on which that plan is based. It seems that the department regards the production of a range of documents as priority actions, whereas they would be no more than milestones along the way to the achievement of a strategic goal to restore and/or protect peatlands. This aspect of the strategy needs to be comprehensively reviewed and rewritten with new SMART targets attributed to each strategic objective.

There is no explanation or justification put forward in the consultation as to why the target date by which all peatlands supporting semi-natural vegetation are being managed for their peatland biodiversity and ecosystem function is 2040. NIEL believes this is an inappropriate target date and that the target date by which this strategic objective should be achieved should be no later than 2030.

One of the priority actions (priority action 4) under Strategy Objective 1 is to "Conduct a review and publish a key issues paper which should include the commercial extraction of peat in Northern Ireland, turbarry rights (including their historic and cultural role) and the use of peat in horticulture." No deadline is given by which this is to have been completed. This is unacceptable. This is not compatible with the recommendation in the CCC report "Land Use: Policies for a Net Zero UK" to "Ban peat extraction and its sale, including of imports Before 2023". NIEL is unclear as to why the draft NI Peatland Strategy is not aligned with the recommendations of the CCC and would instead propose to publish a 'key issues paper' on a clear recommendation of the CCC which is due to be implemented before 2023. NIEL believes that the targets proposed in the NI draft peatland strategy should align with the existing UK and international advice, policies and recommendations as far as possible and that there is no good reason for the advice and recommendations of the CCC to be disregarded in the manner proposed. Given that the AERA Minister said on 12th May 2021 that one of the major concerns he had in relation to the Private Members Bill on climate change was "The apparent disregard for the expert and independent evidence and advice from the UK Climate Change Committee;" it would be inconsistent to say the least for the AERA Minister to then propose a series of strategic objectives that are clearly not compliant with the specific advice of the CCC in relation to peatland conservation. Strategic objective 1 needs to be revised.

## Strategic Objective 2

13 Do you agree with Strategic Objective 2?

No

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

No

15 If appropriate, please provide any further comments you may have on Strategic Objective 2 or the associated actions.

Do you have any further comment on Strategic Objective 2 or the associated actions?:

The target for Strategic objective 2 is: "By 2030, degraded peatland habitats are prioritised for restoration to favourable conservation status. By 2040, all high priority degraded peatlands will be under restoration management."

However, on the basis that the first of the priority action under strategy objective 2 is to "Compile a list of potential Peatland Restoration Sites to action and a decision making framework for investment by 2022.", which NIEL would support, it is unclear why DAERA is projecting to take another eighteen years from the production of this list and decision making framework to have not even all peatlands, but only high priority degraded peatlands, under restoration management? This timeline is unacceptably slow. There is no explanation or justification put forward in the consultation as to why the target date by which restoration of only some (the high priority) peatlands is 2040 and that by 2030 the target is for a prioritisation exercise to have been completed. This lack of action and urgency is not acceptable. NIEL suggests that in effect peatland restoration should be should be as near to completion as possible by 2030. As such strategic objective 2 needs to be revised.

As outlined in our response to Q11, the department has listed the publication of a series of documents as priority actions. However, the mere publication of a document does not ensure the achievement of the goal to which that plan relates. This aspect of the strategy needs to be comprehensively reviewed and rewritten with new SMART targets attributed to each strategic objective.

### Strategic Objective 3

16 Do you agree with Strategic Objective 3?

No

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

No

18 If appropriate, please provide any further comments you may have on Strategic Objective 3 or the associated actions.

Do you have any further comment on Strategic Objective 3 or the associated actions?:

The target of strategic 3 is that "By 2040 – High Priority degraded peatlands in Northern Ireland are under sustainable management."

As outlined in our response to Q11 and Q15, the department has listed the publication of a series of documents as priority actions. However, the mere publication of a document does not in any way ensure the achievement of the goal to which that plan relates. This aspect of the strategy needs to be comprehensively reviewed and rewritten with new SMART targets attributed to each strategic objective. Having an area or areas or habitat or habitats under sustainable management is not sufficient to ensure that area or habitat is appropriately protected and restored. As such strategic objective 3 needs to be revised.

Priority actions 21 in the peatland strategy is to "Encourage the reduction and cessation of the use of peat by all statutory bodies and agencies by end of 2022". Priority action 22 is to "Seek to phase out the use, import and sale of peat compost in Northern Ireland by 2025" and priority action 23 is to "Conduct a review on the potential for a ban on peat extraction on all publicly owned land by 2022." respectively. However, NIEL regards the use of terms such as "seek to phase out" vague and ineffective to the point of irrelevance. Similarly, more than enough is known about the damage that has been and still is being caused by the extraction and sale of peat compost, so NIEL believes it would not be practical to conduct a review on the potential for a ban on peat extraction on all publicly owned land by 2022 given that the recommendation of the UK CCC in "Land Use: Policies for a Net Zero UK" is to "Ban peat extraction and its sale, including of imports" by 2023. It seems unnecessary to 'conduct a review' of a policy when a clear recommendation on that specific policy has already been made for the whole of the UK. If NI fails to ban all peat extraction and sale including of imports by 2023, that would represent a failure to comply with the advice of the CCC. NI should just stop the extraction and sale of peat across NI as soon as possible and no later than 2023, in line with the CCC's recommendations. As outlined in our response to Q12, given that the AERA Minister (incorrectly in NIEL's view) said on 12th May 2021 that one of the major concerns he had in relation to the Private Members Bill on climate change was "The apparent disregard for the expert and independent evidence and advice from the UK Climate Change Committee;" it would be inconsistent to say the least for the AERA Minister to then propose a series of strategic objectives that are clearly not compliant with the specific advice of the CCC in relation to peatland conservation.

### Strategic Objective 4

19 Do you agree with Strategic Objective 4?

No

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

No

21 If appropriate, please provide any further comments you may have on Strategic Objective 4 or the associated actions.

Do you have any further comment on Strategic Objective 4 or the associated actions?:

NIEL supports the objective of raising awareness of the importance of peatlands but believes that the need for peatland conservation and restoration is already sufficiently well understood though the fact that it is not clear which stakeholders the strategy refers to, as they were not identified and what those stakeholders will be required to do in order to deliver the Strategic Objectives and Actions contained within the Northern Ireland Peatland Strategy, makes evaluating this objective, more difficult. Generally, the objective of raising awareness is a worthwhile one but NIEL would like to see the target date brought forward so this starts as soon as possible.

The actions listed could make a significant contribution to achieving Objective 4 if properly implemented. Each of these actions also needs to be allocated a target date by which they will be implemented and completed.

## Strategic Objective 5

22 Do you agree with Strategic Objective 5?

No

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

No

24 If appropriate, please provide any further comments you may have on Strategic Objective 5 or the associated actions.

Do you have any further comment on Strategic Objective 5 or the associated actions?:

NIEL supports the aim of raising awareness and increasing the understanding of the benefits of and value of our peatlands, but would ask who is it the department believes needs to recognise peatlands for their unique biodiversity needs and ecosystem services provision? This target audience needs to be identified. Otherwise, how could the success of this objective be accurately measured?

NIEL supports priority action 33 to "Establish a long-term Peatland Communications campaign (in conjunction with other stakeholders) to boost awareness of peatlands, their role in ecosystem service provision and peatland heritage." However, greater clarity is needed in terms of who the target audience is for this, who is going to be involved in this communications campaign and how it is going to be funded. NIEL would also suggest that the priority should be to actually protect and conserve our peatlands.

Also, the language used in priority actions 34 and 35 is so weak and vague that it is in effect meaningless. For example, rather than say in priority action 34 "Peatland Land Managers to consider if possible, facilitating managed access to peatlands for recreation and education.", the goal of priority action 34 should, as a minimum, be "To secure managed access to peatland sites for recreation and education". NIEL would also recommend that a target number of such sites be specified in the rewritten priority action. The strategy needs to commit to actions, not commit to possibly considering doing certain things or publishing a document or documents.

Priority Action 35 suggests that the peatland survey currently underway may well identify sites which have the potential to be used for recreation and education. If not, it may be necessary for a scoping exercise to be carried out to assess the recreation and educational potential of our peatlands in which case priority action 34 could be rewritten to say "A scoping exercise will be carried out for all peatland areas as to their recreation and educational potential in order to secure managed access to appropriate peatland sites for recreation and education." However, once that evaluation is complete, priority action 35 needs to aim for more than the recreation and education potential of peatlands 'to be considered'. The recreation and education potential of peatlands needs to be fully evaluated with a view to ensuring the goal in the revised priority action 34 is achieved namely "to secure managed access to appropriate peatland sites for recreation and education". Priority action 35 should then also be reviewed and could be reworded to say "The recreation and education potential of peatlands is assessed and appropriate sites identified which will facilitate the achievement of priority actions 33 and 34." NIEL would agree that the upgrading of traditional routes/old access roads should be considered to facilitate recreational access and as part of that, NIEL would recommend that the 'Helping the Hills' principles could usefully be adapted to guide the development of recreation infrastructure in peatland areas .

NIEL believes the last sentence in priority action 35 needs to be reviewed in order to provide greater clarity. Also, it is unclear why the installation of access facilities would need to be landowner led. It is entirely appropriate that the landowner or landowners must be involved throughout the process of installing or upgrading any access but there is a lack of clarity as to exactly what the current wording of priority action 35 means in relation to the provision of such access being 'landowner led'. NIEL would anticipate that the department would provide more detail to landowners on what areas are the responsibility of the landowner and what areas are the responsibility of the department. NIEL believes that the revisions suggested above are necessary if priority action 33 is to be achieved.

## Strategic Objective 6

25 Do you agree with Strategic Objective 6?

Yes

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

No

27 If appropriate, please provide any further comments you may have on Strategic Objective 6 or the associated actions.

Do you have any further comment on Strategic Objective 6 or the associated actions?:

Priority actions 36 to 41 are relevant to strategic objective 6, unlike many of the other priority actions in the strategy and so are welcome. However, NIEL is not in a position to say that these priority actions will ensure Strategic Objective 6 will be achieved without the provision of further detail from the department. That said, the priority actions proposed in this section should contribute to delivery of the strategic objective and actions contained within the NI peatland strategy and so NIEL is generally supportive of the proposed priority actions 36 to 41.

Secure, long term funding will be needed in order to achieve Strategic Objective 6 and to achieve the landscape scale peatland restoration necessary to better protect our biodiversity and to tackle and adapt to climate change. The need for funding goes well beyond the need to implement Peatland SAC Management Plans and Peatland Restoration Plans for sites outside the Designated Site Network. As per the PfG, the department in particular needs to think of the outcomes and needs to take the long term approach necessary to produce the best outcome possible for peatland conservation in NI.

## Final Comments

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

Do you have any final comments on the draft NI Peatland Strategy 2021-2040?:

In the 'Introduction' section on page 8, in relation to climate change legislation for Northern Ireland, the consultation says that as a result of the commitment in the NDNA agreement

"work is ongoing with the aim to bring forward a Climate Change Act for Northern Ireland within the lifetime of the current Assembly mandate (March 2022). As part of that work and to inform the Act's development, DAERA carried out a public consultation on a 'Discussion Document on a Climate Change Bill', which closed on the 1 February 2021. The responses to that consultation, and advice received from the Climate Change Committee on Northern Ireland's fair and equitable contribution to UK Net Zero, have informed the development of policy proposals for a Climate Change Bill and approval of these proposals is currently being sought from the Northern Ireland Executive."

A cross party Private Members Bill (PMB) on climate change was introduced by Clare Bailey MLA on 22nd March 2021. This PMB passed its second stage on 10th May 2021, by a 2:1 majority, yet the peatland strategy which was published in June 2021 makes no reference whatsoever to this bill. NIEL would be interested to know how and why the Department with responsibility for climate change made no reference to what was, at the time of publication of the peatland strategy consultation, the only NI specific climate change legislation in existence? NIEL believes that it is the responsibility of all departments to be comprehensive, accurate and objective in how information is provided to the general public and so the omission of any reference to the PMB seems, initially, unjustifiable. NIEL would ask the department to provide an explanation for this omission.

On page 23 the strategy says "Recent condition assessment data for all peatland SACs and ASSIs has demonstrated that a high proportion of the habitat within designated sites is generally 'unfavourable' or at best 'unfavourable-recovering' condition." NIEL is not clear why the department did not provide further detail in relation to the condition of peatland ASSIs and SACs. For example, why say "a high proportion of the habitat" is unfavourable and not give the exact figures in terms of area and percentage of overall habitat? This limited disclosure of information is unhelpful.

The peatlands strategy has the right aims and objectives but the target dates are inappropriate and unacceptable. No explanation or justification is given for the deadline dates for most of the objectives in this strategy. The weak and vague language and the serious lack of ambition are the other major failings of this draft. The NI peatland strategy also needs to tie in to the NI biodiversity strategy, the NI environment strategy, the UK CCC advice and recommendations and any future NI Climate Change Act as well as all other relevant policies and legal obligations such as the NI PfG as well as all relevant policies and commitments most notably those relating to peatland protection and restoration and climate change in the Republic of Ireland, but the strategy did not refer to this need for integration. Given the cross border nature of our peatlands and catchments, the need for integration with relevant policies and commitments in Ireland is essential. This approach is established in relation to freshwater protection and the NI peatland strategy needs to include and build on this all island approach. The landslide of peat in Meenbog in County Donegal which had an impact on the Mournbeg river which flows into the river Derg and then the river Foyle, which is one of the most important rivers for Atlantic salmon on the island, is a clear example of the need for ecosystem wide and/or catchment wide considerations in relation to the management of peatlands.

Overall, NIEL believes this draft strategy needs to be comprehensively reviewed and rewritten and strengthened to ensure that it has appropriate SMART targets which will ensure that peatland conservation and restoration in NI should be as near to completion as possible by 2030.