



Submission

Submitter:	Mr Tristram Whyte
Organisation Name:	Irish peatland Consevation Council
Submission Title:	Westland Horticulture IPC Licence Application
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Application

Applicant:	Westland Horticulture Limited
Reg. No.:	P0914-01

See below for Submission details.

Attachments are displayed on the following page(s).

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IRISH PEATLAND CONSERVATION COUNCIL

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Environmental Protection Agency
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27th May 2020

**RE: Reg No. P0914-01, Westland Horticulture Ltd, Lower Coole, Mayne, Ballinealoe & Clonsura, Near Coole & Fineagh, Westmeath
Application for IPC Licence**

Dear Sir/Madam,

The Irish Peatland Conservation Council (IPCC) would like to make a submission on the application for an IPC Licence by Westland Horticulture Ltd for peat extraction. IPCC are an Environmental Non-Governmental Organisation with charity status which has campaigned for the wise and sustainable use of Ireland's peat resources for over 30 years.

The original extent of Raised Bog in County Westmeath has been estimated at 26,702ha (Hammond, 1979), but in 2001 it was estimated at only 1,648ha, a reduction of ~94% (Foss, O'Connell, Crushell, 2001). Raised bog in County Westmeath is virtually all but extinct and this is due to lack of enforcement and mandatory control of peat extraction and turfcutting. It is shocking that Westland Horticulture has been operating since the mid 1990s without any proper regulation and the recent Appropriate Assessment Screening Report and Natura Impact Statement (AASR & NIS) fall short of any real claim of responsibility for habitat and wildlife losses, evident by the complete lack of any real monitoring of the environmental impacts of their business over this period.

Monitoring

The data offered in the AASR & NIS is incomplete. In Section 4.2 the report states that the Bergerhoff Gauges have not been working due to interference, if this is the case how is it possible to ascertain the impact on air quality and the environment? Absence of complaints is not an absence of effect. It is also noteworthy that much of the data that is presented throughout the report is out of date (water quality data from 2010 and biodiversity data from 2013). It lacks the timeframe it was collected, the methods of collection and the precise locations of monitoring equipment.

Restoration

In response to the Appropriate Assessment for this licence the NPWS recommended in 2010 that a restoration plan should be an integral feature of issuing any IPC Licence. IPCC can see there is no evidence that this recommended action was taken on board. Due to the low amount of raised bog left in County Westmeath this should be a priority.

To make this recommendation a reality IPCC propose that the peat extraction works on these sites are stopped while there is still an acidic substrate remaining. Looking at the aerial photographs of the sites there are raised bog remnants (outlined in red on [Figures 1 & 2](#)) containing *Sphagnum* mosses present (currently outside Westland ownership) which should be acquired by Westland and used as donor sites for *Sphagnum* transfer restoration. This would ensure a higher chance of raised bog habitat which is in such short supply in the country as it is nearly extinct in Ireland. We refer you to the Canadian transfer method used in the horticultural industry in Canada (Quinty, Rochefort, 2003). The IPCC conducted a study on this method in an Irish context funded by the EPA which showed successes. The EPA need to make a decision on this case in regard to the end result of peat extraction. Is it to be a raised bog habitat restored or are they happy to allow rehabilitation without quality habitat which continues to emit carbon.

35 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity Numbers/Uimhir Carthanacht: CHY6829 & RCN 20013547 Registered in Ireland No/Uimhir Cláráithe in Éirinn: 116156 Registered office: Lullymore, Rathangan, Co.Kildare, R51V293, Ireland

Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary: Rachel Kavanagh

Directors: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Miriam Mooney, Kate Macnamara, Seán Ó Fearghail

Patrons: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands, Eanna Ni Lamhna, Matthijs Schouten, His Excellency Mr Adriaan Palm - Netherlands Ambassador to Ireland

Rehabilitation

A habitat rehabilitation plan is not the same as a restoration plan and IPCC have issues with this. The traditional rehabilitation plan which is a part of the IPC Licence is not concerned with the restoration of habitats but only with the stabilisation of the peat soils to stop emissions to air and water, which falls short of real restoration and ongoing carbon store security. IPCC's understanding is that detailed guidelines are being drawn up on restoration methods and goals by the EPA following a joint workshop between NPWS, IPCC, Bord na Mona and the EPA held in Abbeyleix, February 2019. IPCC have already seen a draft document in this regard and commented on this. The recent VAPOR report commissioned and published by the EPA states that unless peat extraction sites are rewetted they will not withstand the climate stressors that are predicted to increase in frequency (such as summer droughts). The post-industrial brownfield sites, which develops into birch scrubland without real financial investment by peat extraction companies in focussed profiling and wetland management and has little mitigation value for the loss of peatland habitat. These areas will return to being sources of carbon to the waterways and atmosphere. We have seen on other post-extraction sites where there has not been enough re-profiling of the landscape and some areas are left too dry. These areas are not able to support wetland species and the dry summers recently experienced (and predicted to get worse) have highlighted the difficulty in keeping peat soils and the carbon stored within them trapped under the water table and away from the waterways and the atmosphere.

Independent monitoring of restoration/rehabilitation

There is a need for an independent body that will oversee any rehabilitation and restoration undertaken. This will ensure that it is conducted to a high degree of quality and is not just a box ticking exercise.

Bird Declines

While it is noted that the declines in bird populations is due to a number of factors and industrial peat extraction cannot be solely responsible, there is likely to be effects on the qualifying interests of Lough Derravarragh SPA. IPCC would like to know what actions the developer has taken to reduce or mitigate this since it was known?

The report also did not take into account the possible migration of species between sites of conservation importance and the impact that peat extraction may have on their movements or behaviour. Data from the National Biodiversity Data Centre and National Parks & Wildlife Service (NPWS) could have been used in this regard.

Horticultural Peat Extraction Not Sustainable

IPCC have issues with peat being extracted industrially for horticulture and have campaigned extensively on this issue. It is not necessary or sustainable and is also responsible for the mass-destruction of Ireland's native habitats and species. Ireland should be a protector of raised bog as the country once held 50% of Europe's raised bog resource. Over 90% of mire has been lost in Western Europe (BOGLAND - Sustainable Management of Peatlands in Ireland, Wilson et al, 2007-2013) and the current biodiversity crisis in Ireland is a symptom of mis-management of our peatland resources. Our views on the use of peat within horticulture can be read at <http://www.ipcc.ie/wp/wp-content/uploads/2017/08/IPCC-Peat-in-the-Horticultural-Industry-Review-2020.pdf> and should be included as part of our submission on this application for IPC Licencing.

We do not believe that horticultural peat extraction provides sustainable jobs in Ireland and the destruction of habitat and loss of species it causes together with its contribution to the climate crisis flies in the face of current government policy (the closure of peat extraction for power generation for climate considerations) and public concern.

Labelling of Westland Horticultural Product Bags

IPCC have examined Westland horticultural product bags on sale in garden centres, there is no precise indication of the peat content in the various products and there is no environmental warning on the bags describing the biodiversity, habitat and climate change implications of using these products for members of the public.

Carbon Emissions

It is unclear within the AASR & NIS by Westland the exact area of peatland included in the licence statement other than it exceeds 50ha. IPCC would like to point out that a 10m deep raised bog stores 40,000 tonnes of carbon per hectare (Malone & O'Connell, 2009). Observing the map of included sites within this application we estimate that they cover up to 450 hectares. How will mitigation for the release of the greenhouse gases stored in these peatlands be addressed within the licence? IPCC project the release of 18 million tonnes of carbon dioxide to the atmosphere from this development. Common sense suggests that no licence should be granted and the sites involved should be restored immediately.

Conclusion

While IPCC see it as imperative to ensure that industrial activities are regularised by government so that proper nature conservation and restoration takes place we have issues with the quality of the AASR & NIS. There has been no real monitoring or data collection which could inform other developments of best practice. This shows a disregard for the impact that industrial extraction has had on Ireland's Natural Heritage and unique landscape. We could not support these activities as there has been no need for the horticultural industry to destroy so much habitat at so much cost with little benefit to the country nationally. We are also unsure as to what happens if this licence is not granted. Is it just business as usual as the damage has been done? Without a licence they are not obligated to conduct any rehabilitation yet if they are granted the licence it will have given them a free pass to conduct their business and manage their landholdings however they see fit without any atonement for their destructive actions to date.

In view of the arguments above IPCC are against granting Westland Horticulture an IPC Licence unless the EPA are prepared to build raised bog restoration into the licence as the end result when peat extraction is complete. Our reasons are that the resource is finite, the jobs created are not sustainable, the biodiversity and habitat losses are substantial and the carbon emissions from the works will have a significant impacts on climate change. We can see no evidence that Westland are prepared to mitigate adequately for their business.

Yours Faithfully,



Tristram Whyte B.Sc (hons) Freshwater Biology
Conservation Policy & Fundraising Officer - IPCC

Note:- IPCC would also like to see that the references within the report are improved as many statements within it do not list them. For example in Section 10 the Irish Peatland Conservation Council is quoted yet the source is not included.

References

Vulnerability Assessment of Peatlands: Exploration of Impacts and Adaptation Options in Relation to Climate Change and Extreme Events (VAPOR) - Florence Renou-Wilson and David Wilson, 2014-2020
http://www.epa.ie/pubs/reports/research/climate/Research_Report_250.pdf

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<http://www.ipcc.ie/wp/wp-content/uploads/2017/08/IPCC-Peat-in-the-Horticultural-Industry-Review-2020.pdf>

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<https://www.teagasc.ie/media/website/environment/soil/Peatlands-of-Ireland.pdf>

Peatland Restoration Guide - Second Edition, François Quinty, Line Rochefort, 2003.
https://tourbehorticole.com/wp-content/uploads/2015/07/Peatland_Restoration-e.pdf



Figure 1: Raised bog remnant East of Westland development outlined in red which could be used as a suitable *Sphagnum* donor site for the Canadian *Sphagnum* Transfer Method.



Figure 2: Raised bog remnant North and West of Westland development site which could be used as a suitable *Sphagnum* donor site for the Canadian *Sphagnum* Transfer Method.