



NI Peatland Strategy Consultation Response

Scope of the strategy

The scope of this 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.

Do you agree with the scope of the strategy?

Yes

Any further comments on the scope of the strategy?

None

Vision of the strategy

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.

Do you agree with the vision of the strategy?

No

Any further comments on the vision of the strategy?

The vision should give a stronger commitment to restoration and enhancement. Potential obstacles to achieving large-scale restoration should not limit the ambitions of the vision.

Aim of the strategy

The IUCN UK Peatland Strategy (2018) sets the scene for co-ordinated effort and a shared agenda amongst all stakeholders. The 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.

Do you agree with the aim of the strategy?

Yes

Any further comments on the aim of the strategy?

Peatlands are an iconic feature of the Northern Irish landscape. They perform multiple functions, including storing large amounts of carbon; providing a home for rare wildlife; preserving a record of our past, and regulating water quality and hydrological conditions. However, for too long we have taken this valuable natural resource for granted.

In Northern Ireland, peat soil covers approximately 12% of our land area. The raised bogs, blanket bogs and fens that make up peatland habitat have the potential to be some of the most wildlife rich landscapes in the country, but as a result of decades of draining, overgrazing, burning, tree planting, and extraction, much of our peatland is in a damaged and deteriorating state. Of the 242,000 thousand hectares of peatlands in NI, an estimated 86% is degraded, but as little as 1% has been restored in some way over the last 3 decades.

Peatlands can improve water quality, give natural flood protection, and provide wild places for public recreation and enjoyment. Peatlands can and must also play a crucial role in tackling the twin nature and climate crises. However, their degraded state means they are emitting their stored carbon back into the atmosphere and are unable to provide their host of ecosystem benefits.

The UK's peatlands currently emit the equivalent of 5% of the UK's greenhouse gases due to their poor condition. This represents twice as much carbon as the tree planting targets recommended by the Committee on Climate Change are likely to capture. By continuing to neglect and harm our peat bogs, any carbon benefits from these new woodlands will be cancelled out. In order to fully utilise the power of nature to tackle the climate and nature crisis, it is essential that we restore our peatlands.

Strategic Objectives

There are 6 Strategic Objectives with associated targets and actions.

Strategic Objective 1

Conserve peatlands & prevent degradation

Target: By 2040, all peatlands supporting semi-natural vegetation are being managed for their peatland biodiversity and ecosystem function.

Priority Actions:

- 1. Compile a Northern Ireland 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.*
- 2. Develop and implement Conservation Management Plans for Peatland SACs\ASSIs, undertaking restoration actions as required.*
- 3. Identify and declare new peatland ASSIs.*
- 4. 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.*
- 5. Conduct a review and publish a paper on the environmental history and cultural heritage value of peatlands to provide a context for conservation and restoration actions.*
- 6. Publish a Position Statement on Upland Management, with accompanying new legislation if required.*
- 7. Develop an agreed and co-ordinated strategic approach among relevant stakeholders to the issue of wildfires.*
- 8. Develop, publish and implement an Ammonia Strategy, which will include priority actions to address nitrogen deposition on peatland.*
- 9. Develop and publish a strategic Peatland Policy and ensure that current and future legislation and policies across Central and Local government are in place for peatland protection and recovery. This may require review and strengthening of the following policies (N.B. this is not an exhaustive list): Site designation & Monitoring, Appropriate Management policies, Planning Policies for Renewable Energy installations, Planning Policies for Peat Extraction, Local Development Plans, Agriculture, Forestry, Land Use policies incorporating cumulative impact of ammonia, Waste Management policies).*

Do you agree with the strategic objective?

No

Do you agree that the actions listed will ensure the strategic objective is achieved?

Partially

Please provide any further comments on the objective and associated action?

The overall target should be changed to state 'well' managed rather than just managed, reflective of a greater level of ambition in terms of what can be achieved.

Our views on the specific actions outlined under objective 1 are set out below:

Action 1 Peatland Register

NFFN welcomes the creation of a peatland register as an urgent priority in order to provide a baseline understanding of the quantity, extent and condition of our peatland resource.

Action 2 Management Plans and Site Designation

NFFN supports the long overdue creation of management plans for peatland SACs/ASSIs. Recent condition assessments for all peatland SACs and ASSIs have demonstrated that most of the habitat is in a generally unfavourable or at best unfavourable-recovering condition.

Given that around 75% of Northern Ireland's land area is used for agriculture, much of this designated peatland will be farmed. It is therefore essential that once plans have been developed, adequate funding that rewards farmers for implementing nature friendly farming practices and promoting carbon sequestration is made available to ensure that actions identified can be delivered effectively.

It should also be noted that a significant part of NI's peatland resource lies out with the designated site network – much of which is likely to be in unfavourable or unfavourable-recovering condition. Consequently, the focus should not solely be on designated sites or those worthy of designation.

Action 3 Declare new Peatland ASSI's

The designation of new sites should be included as part of a strategy to tackle the current poor condition of peatlands in Northern Ireland. However, it is essential that any newly designated sites are monitored and managed effectively with their own management plans and adequate resourcing. Across the UK protected sites are suffering due to poor management. Investing in good management of new and existing sites will bring multiple biodiversity and carbon benefits.

Action 4 Review and Key Issues Paper

NFFN welcomes the proposed review into key issues regarding commercial peat extraction, its use in horticulture and turbarry rights. However, we have concerns that the length of time required to conduct a review will result in meaningful action being delayed. We would therefore suggest that a specific timeframe be set for completion of the Review – ideally within 1 year of the final strategy's publication.

The extraction of peat for commercial or horticultural purposes, including mushroom cultivation, is clearly incompatible with combatting climate change and biodiversity loss. Peatlands must instead be managed as an asset for tackling the climate and nature emergencies. This necessitates a comprehensive programme of peatland restoration at a landscape scale, enhanced protection and management and a ban on activities, such as peat extraction.

The final peatland strategy should commit to end dates for commercial peat extraction and the use of peat in horticulture, preferably by 2025 at the latest. Legislation introduced prohibiting the commercial extraction and sale of peat would then need to be strictly enforced to ensure compliance.

Turbary rights is a complex matter, and any review is likely to be highly protracted. Therefore, we would suggest it be dealt with separately, in order to allow actions around commercial extraction and peat use in horticulture to be progressed with a sense of urgency in line with other jurisdictions.

Action 5 Cultural appreciation

NFFN welcomes any steps to encourage understanding and appreciation of the cultural value of peatland habitats and species. Northern Ireland's peatlands are our "Amazon rainforest" equivalent in terms of their value for nature and carbon sequestration. Consequently, it is essential that the strategy seeks community buy-in, engendering a cultural change in attitude towards peat extraction and burning, and demonstrating that the key role for our peatlands in the future will be for them to be wet, in good condition and well managed.

Action 6 Uplands Management

NFFN supports the creation of a Position Statement on Upland Management but believes that this will only be beneficial if it comes with an ambitious timeframe for development and delivery.

Despite a UK-wide commitment to monitor the condition of protected sites and species, upland sites are poorly monitored in the UK. Consequently, the condition of peatland habitats and their associated species is often poorly documented. A recent report on the State of Nature in the EU (Article 17 Reporting) reached the conclusion that blanket bog and wet heath in the UK are in an unfavourable/bad state and that future prospects for these habitats are poor.

The poor state of peatland habitats in the UK uplands can be attributed to a combination of historic (atmospheric pollution, burning, afforestation) and current land management practices (burning, drainage, inappropriate grazing) with large swathes of blanket bog and wet heath, including protected sites, in poor condition.

It is encouraging to see large areas of upland being brought under EFS Higher Remedial Management options, but greater consideration should be given to enabling the development of bespoke grazing plans which can be tailored to reflect individual site conditions, rather than having to adopt a one size fits all approach.

Action 7 Wildfires

Upland wildfires, such as those witnessed in the Mourne this year, are dangerous for people and catastrophic for nature. Incidents of this type are becoming increasingly frequent and severe across Northern Ireland and due to past and current management practices, landscapes aren't as resilient as they once were and are unable to withstand extreme weather. Improved upland management, guided by a refocussing of land management policy and funding will be vital if we are to create a landscape that is more resilient in the face of increasing climate impacts. This includes carefully weighing up the balance between achieving "wins" for nature and carbon sequestration, and increasing fire load.

Action 8 Ammonia Strategy

Ammonia poses a significant threat to protected sites, including bogs, heathlands and low nutrient grasslands. "Lower" plants, such as lichens and bryophytes like Sphagnum moss, are

particularly sensitive to nitrogen. Exposure to ammonia can cause discolouration, increased susceptibility to algal blooms and nutrient starvation in these species. Excess nitrogen in soil can cause severe damage to lichens and bryophytes, increased sensitivity to plant stresses such as changes to pH and temperature and cause runaway growth of bramble and holly.

Most Northern Ireland's protected sites currently exceed critical levels of nitrogen deposition and ammonia emissions. Therefore, an ambitious Ammonia Strategy with a clear timeframe for development, publishing and implementation is urgently required to prevent further damage being caused to peatland habitats from ammonia emissions and nitrogen deposition.

Action 9 A Peatland Policy and the Need for Policy Integration

Given the wide range of land uses that impact on peatland habitats, policy integration across local and central government and between government Departments will be crucial to realising the ambitions of the peatland strategy. It is essential that a range of government policies be revised to align with the new peatland strategy and policy to ensure that peatland protection and restoration is prioritised.

Demonstrating the cross-Departmental relevance of peatland restoration, in terms of creating green jobs, tackling climate change, improving water quality and biodiversity and preventing flooding can help to justify large-scale investment from the NI Executive.

Specifically in relation to farming, NFFN would argue that agricultural policy reform is essential so that farmers are rewarded for delivering good management of peatland habitats.

Strategic Objective 2

Restoration of degraded areas to functioning peatland ecosystems (designated & non-designated sites)

Target: 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.

Priority Actions:

10. *Compile a list of potential Peatland Restoration Sites to action and a decision-making framework for investment by 2022.*
11. *Develop and implement Restoration Plans for prioritised peatland sites outside the Designated Site Network.*
12. *Secure funding and initiate a programme of Peatland restoration projects on both publicly and privately-owned land, in conjunction with stakeholders.*
13. *Review planning approvals for peatland extraction sites to ensure that all planning conditions are adhered to, including responsibility for reinstatement/restoration.*
14. *Identify and prioritise areas of afforested peat on Forest Service land for restoration to peatland habitat, particularly where biodiversity and carbon gains would be maximised.*
15. *Establish peatland restoration demonstration sites on land in public or private ownership with agreement of the landowner.*

Do you agree with the strategic objective?

Yes

Do you agree that the actions listed will ensure the strategic objective is achieved?

No

Please provide any further comments on the objective and associated action?

The target to prioritise degraded habitats by 2030 shows a lack of urgency. NFFN would suggest that prioritisation could take place within 3 years of publication of the final strategy with restoration on priority sites beginning within 5 years. The 2040 target is also somewhat vague. Does this mean that restoration work may only begin on some sites by 2040? We would suggest that this should be amended to 'under active restoration management by the start of 2040'.

Our views on the specific actions outlined under objective 2 are set out below:

Action 10 Potential Restoration Sites

NFFN welcomes the inclusion of this action which demonstrates a greater sense of urgency than the overarching target.

Action 11 Restoration Plans for Priority Sites

NFFN supports the development of restoration plans for sites out with the Designated Site Network. We would welcome a timeframe for the completion of restoration plans, an indicative delivery phase for restoration works and publication of the criteria being used for site prioritisation.

Action 12 Secure Funding and Initiating a Programme of Peatland Restoration

NFFN believes that a mix of funding from public, private as well as EU and other external funding sources will be required if we are to deliver ambitious, large-scale peatland restoration across Northern Ireland. However, it is essential that government shows real leadership by allocating significant sums of public funding to deliver peatland restoration. This should be seen as a key priority across the whole NI Executive-wide given the wide-ranging public benefits derived from peatland and the value for money and real return on investment it presents.

The job creation potential of nature restoration initiatives, such as peatland restoration, is recognised in the context section of the draft strategy. Funding for such schemes will drive both 'high skilled' and 'less skilled' employment, requiring hydrologists, ecologists, project managers, tourism specialists, GIS specialists, modellers, as well as contractors - similar to the types of roles that are required to deliver a traditional large-scale infrastructure project.

We would urge the NI Executive to at least match the levels of funding allocated to delivering large-scale peatland restoration programmes in other jurisdictions, where substantial amounts of public money are being committed.

Action 13 Review of Planning Approvals for Peatland Extraction

NFFN supports the view that all existing planning approvals should be subject to review and ongoing monitoring **to ensure compliance with planning conditions, to ensure that all restoration plans for existing peat extraction sites are effectively delivered and to align all existing planning approvals with the cessation of all peat extraction by 2025 at the latest.**

When reviewing old planning approvals for peatland extraction sites there should be **the option to remove planning consent so that extraction cannot continue and a requirement to restore previous areas of extraction.** Additional resource is also required to tackle unauthorised peat extraction.

It is essential that **strategic and local planning policy be revised to issue an immediate presumption against granting planning permission for peat extraction.**

To ensure a 'just transition', the small number of employees involved in peat extraction in Northern Ireland should be offered the opportunity to re-train and be deployed to undertake peatland restoration. Where this is not possible, compensation or provision of education and re-skilling may be necessary. The Irish government announced a compensation scheme for peat extraction employees to ensure a just and fair transition for those employed in peat extraction.

Action 14 Restoration of Afforested Peat

The historic afforestation of peatland habitats has contributed to the fragmentation and degradation of our peatland resource in Northern Ireland. The planting of non-native conifer species on deep peats has had significant negative effects on carbon storage and biodiversity.

Species disadvantaged by afforestation on peatland include curlew, golden plovers, dunlin and lapwing, all of which are in decline as breeding species in Northern Ireland. Curlews are in particularly steep decline and face the very real possibility of going extinct as a breeding species in Northern Ireland.

NFFN commends the forestry sector for their ongoing commitment to removing areas of plantation forestry on peat soils that are commercially compromised and restoring them to functioning peatland. Removing the trees, blocking drains, rewetting and encouraging the colonisation of peatland vegetation can eventually result in healthy, restored peatlands that are beneficial for people and nature. Where commercially viable plantations overly relatively intact deep peat soils we would hope to see future efforts to restore these too.

Action 15 Peatland Restoration Demonstration Sites

NFFN would welcome the establishment of Peatland Restoration Demonstration Sites. Providing examples of successfully restored sites can help farmers and other stakeholders understand the wide range of benefits that healthy, restored peatlands can provide and inspire them to take similar action on their own land.

Strategic Objective 3

Supporting Sustainable Peatland Management

Target: By 2040 – High Priority degraded peatlands in Northern Ireland are under sustainable management.

Priority Actions:

- 16. Develop Land Management schemes through new, post CAP, agricultural policies, which provide targeted support to underpin the appropriate management of all peatlands.*
- 17. Develop a practical infrastructure for delivery of peatland restoration, building on current specialist knowledge, skills and experience providing best value restoration and maximising impact of the investment.*
- 18. Provide funding to facilitate restoration and appropriate management on peatlands with multiple ownership.*
- 19. Commit to Landscape scale peatland restoration partnerships, funded by e.g. Heritage Lottery Fund, LIFE, Peace Plus and ensure match funding is available to enable delivery.*
- 20. Support and where necessary require, landowners to deliver land uses that are compatible with healthy peatlands e.g. sustainable grazing regimes and proactively enable a smooth transition via support for innovation in farming methods and machinery and market development of alternative peat products.*
- 21. Encourage the reduction and cessation of the use of peat by all statutory bodies and agencies by end of 2022.*
- 22. Seek to phase out the use, import and sale of peat compost in Northern Ireland by 2025.*
- 23. Conduct a review on the potential for a ban on peat extraction on all publicly owned land by 2022*

Do you agree with the strategic objective?

Yes

Do you agree that the actions listed will ensure the strategic objective is achieved?

No

Please provide any further comments on the objective and associated action?

The target lacks urgency. Only guaranteeing that the high priority peatlands are under sustainable management by 2040 is insufficient to deliver the objective of 'supporting sustainable peatland management'.

We need all degraded peatlands that have been identified as suitable for restoration to be under 'sustainable management' by 2040, meaning that they are well on their way to full restoration, if not fully restored by 2040, rather than just beginning their restoration process by 2040.

Our views on the specific actions outlined under objective 3 are set out below:

Action 16 Agricultural Policy

NFFN believes that fundamental reform of agricultural policy is essential if we are to effectively address the threats to our peatlands and begin restoring them to their natural state.

Future agricultural policy must ensure that all farmers are rewarded for delivering nature friendly farming practices and environmental public goods such as carbon sequestration, water and air quality, and flood risk mitigation. The current basic payment system, which accounts for the vast majority of agricultural subsidy support, does little to incentivise good practice or encourage farmers to view their farms through anything other than the narrow lens of productive output.

The historically low payment rates which areas of actively farmed peatland have attracted (even through agri-environment schemes), due to their perceived lack of agricultural value, has created a legacy of poor management. Farmers have been installing drainage ditches, applying lime, fertiliser and slurry, burning and inappropriately grazing peatlands for decades – all in a misguided effort to “improve” the land. This has had a devastating impact on the nature value of these precious habitats and has hindered their ability to act as carbon stores.

A radically different system of support payments based upon the principal of public money for public goods, combined with appropriate education, support and advice, would help to bring about a transformational shift in farmer attitudes, as they would come to view their land as a suite of natural assets which if carefully managed can generate significant financial income in addition to that which they receive for selling their produce.

Action 17 Practical Infrastructure for Delivery

NFFN would welcome clarification on what is meant by ‘practical infrastructure’. In terms of the practical skills, knowledge and expertise required to restore peatlands in Northern Ireland, peatland restoration projects have been ongoing in the UK for decades and techniques and practical ‘know-how’ has improved considerably during this time. There is a lot that we can learn from those working on peatland restoration both in other jurisdictions and within Northern Ireland.

It should be noted however, that restoration alone is not sufficient; appropriate future land management is essential. As already mentioned, it is essential that agricultural policy transitions away from ‘business as usual’ and rewards farmers for the delivery of public goods. This will require grazing at appropriate stocking densities, in line with the carrying capacity of the land.

Action 18 Funding for Restoration

Our ambitions for a nature friendly, net zero future must be matched with funding. Funding peatland restoration provides an excellent return in terms of carbon storage, flooding prevention and improving habitat condition. Studies have shown that peatland restoration in Northern Ireland provides approximately £4 in public benefit for every £1 invested. As previously alluded to, DAERA must make the case within the NI Executive that peatland restoration is more than an ‘environmental issue’. Peatland restoration has cross-Departmental relevance and should be viewed as a critical component of green growth and an investment

priority given its potential to create green jobs, tackle climate change, improve water quality and biodiversity and prevent flooding.

Action 19 Landscape-scale partnerships

The overwhelming majority of peatland restoration undertaken in Northern Ireland thus far has been funded through EU programmes. NFFN believes that stakeholders should continue to work in partnership to access significant funding through the likes of Heritage Lottery Fund, LIFE and Peace Plus. DAERA should also be open to opportunities for private investment and consider providing catalyst funding, to enable partnerships to develop substantial funding bids. The ambition shown by other jurisdictions in the UK (see comments under action 12), must now be matched by the Northern Ireland Executive through allocating substantial funding to deliver a Peatland Restoration Programme.

Action 20 Compatible Land Uses

Stakeholder support and engagement around managing peat soils sustainably will be critical to the success of Northern Ireland's peatland restoration programme. This requires an integrated approach to environmental land management that places a legal obligation on landowners to cease damaging practices and incentivises sustainable land uses that are compatible with maintaining and enhancing peatland habitats.

Action 21 Cessation of peat use by statutory agencies and bodies

NFFN views the wording of this action to 'encourage' the reduction and cessation of the use of peat by statutory agencies by 2022 as far too weak. The final strategy must require an immediate ban on the use of peat products by Statutory bodies and agencies. There is absolutely no justification for statutory bodies to continue to use peat products, such as peat compost on the government estate. Furthermore, a complete and enforced phasing out of peat extraction in Northern Ireland must be initiated at the earliest opportunity. Given that this action is wholly within government's control, NFFN urges government to show leadership by immediately banning the use of peat products by statutory bodies and agencies.

Action 22 Phasing out Peat Compost

NFFN believes that this target, in its current form, lacks ambition and urgency. Given the multiple stakeholders involved, we accept the need for a phasing out, rather than an immediate ban. However, we would want to see a commitment to ending import, use and sale of peat by a certain end date, rather than 'seeking' to phase out. We suggest this action be revised as follows: End the use, import and sale of peat compost in Northern Ireland by 2025 at the latest. The final strategy should include clear actions and timelines for delivering this action by 2025.

We need to see firm commitments to end the use, import and sale of peat compost entirely by 2025, with legislation being introduced to make this happen in line with other jurisdictions.

Action 23 Peat Extraction on Publicly Owned Land

NFFN welcomes the intention to Review this issue, however we are wary of the length of time a Review could take. We would suggest that wherever possible the extraction of peat on publicly owned land must be banned immediately. Where turbary rights prevent the introduction of an

immediate ban this should be subject to a Review with a view to ending all peat extraction on publicly owned land within one year of publication of the strategy.

A complete and enforced phasing out of all peat extraction in Northern Ireland is essential and government must lead the way on this issue. In a climate and nature emergency it is highly inappropriate to continue to allow peat extraction on publicly owned land. No new licenses for peat extraction should be granted or extended and any existing licenses should be revoked. In the Republic of Ireland Bord na Mona has ended all peat harvesting on its land.

Strategic Objective 4

Knowledge Sharing & Research

Target: By 2025, stakeholders understand the need for peatland conservation and restoration and have the capacity to deliver the Strategic Objectives and Actions contained within the Northern Ireland Peatland Strategy.

Priority Actions:

24. *Develop a Knowledge Exchange Network to share good practice with other peatland stakeholders via conferences, workshops and site visits.*
25. *Develop bespoke training courses for landowners/organisations involved in peatland conservation and restoration.*
26. *Build capacity and develop practical skills training courses for peatland restoration contractors.*
27. *Commission and fund research into the vulnerability of Peatlands in Northern Ireland to Climate Change, mitigation methods and impacts of peatland restoration.*
28. *Carry out research into peatland management which can support both biodiversity and farming outcomes at CAFRE Hill Farm and other demonstration sites.*
29. *Commission and fund research into the long-term effects of Nitrogen Deposition on Peatlands in Northern Ireland.*
30. *Compile evidence to inform the development of peatland restoration and management plans and identify evidence gaps that require further research.*
31. *Commission monitoring and evaluation of the restoration programme and citizen science projects.*
32. *Facilitate research at AFBI/CAFRE into alternative growing media.*

Do you agree with the strategic objective?

Yes

Do you agree that the actions listed will ensure the strategic objective is achieved?

Partially

Please provide any further comments on the objective and associated action?

NFFN supports the objective and recognises the importance of building stakeholder capacity and understanding. However, we are concerned that a 4-5 year target timescale for capacity building is too long and will delay practical action. There is ample awareness and evidence around the key issues impacting on peatland habitats to justify immediate action.

Northern Ireland needs an ambitious strategy that recognises the urgency of the biodiversity and climate crises and the role of peatlands in tackling these interconnected challenges. Creating a greater understanding of why peatlands are important in this context will be vital for public buy-in.

We would welcome clear timeframes and framework for delivery of each of the actions set out under objective 4.

Action 24 Knowledge Exchange Network

NFFN could act as a platform for knowledge exchange, sharing ideas and latest research between peatland stakeholders. It would facilitate the dissemination of best practice and help foster collaboration and partnership between stakeholders. Farmers and other landowners involved in managing and restoring peatland sites should be included in this network to share and promote best practice.

Actions 25 and 26 Training

NFFN considers upskilling and broadening the pool of land managers and contractors who are equipped to deliver peatland restoration to be essential. Re-training employees involved in peat extraction should be prioritised, in tandem with the development of a Peatland Restoration Programme. Providing adequate funding for the necessary training will be critical to delivering on restoration ambitions.

Actions 27, 28 and 29 Research

NFFN believes that research around peatlands and climate change, implementing nature friendly farming practices on peatlands and the impact of nitrogen deposition on peat soils is important.

However, there has already been extensive research undertaken looking at these topics in other jurisdictions and through the IUCN UK Peatlands Programme. Therefore, whilst we would welcome further research, this should not delay the urgent action needed to recover our peatland resource. The evidence gained from existing research can be used to inform current decision making in Northern Ireland.

Further research should be conducted with the design of future agriculture policy and environmental land management approaches in mind. Benefits of peatland restoration to farmers, such as a reduction in livestock deaths from getting stuck in eroded drainage ditches, should be included here and evidence from across the UK and Ireland will be relevant to our approach in Northern Ireland. Future research should cover the full breadth of peatland habitat types and peat rich soils found across Northern Ireland within its scope, and demonstration sites chosen accordingly.

Action 30 Evidence Gaps

NFFN would suggest that a separate objective that focuses on identifying evidence gaps and commissioning and funding research that addresses these areas could be included in the strategy.

Action 31 Evaluation and Monitoring

The peatland strategy and the restoration work to be completed as a result, is critical to ensuring that Northern Ireland reaches net zero. Restoration efforts must be closely monitored and there should be regular, transparent and publicly accessible progress reporting.

NFFN would support the inclusion of citizen science projects within the strategy, as they are a valuable tool for engaging the public with nature conservation and issues around climate change. Evaluation and monitoring of any such projects would be a useful barometer for measuring community awareness, understanding and support for peatland restoration in Northern Ireland.

Strategic Objective 5

Communication, Education & Access

Target: Peatlands are recognised for their unique biodiversity and ecosystem services provision.

Priority Actions:

33. 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.

34. Peatland Land Managers to consider if possible, facilitating managed access to peatlands for recreation and education.

35. Recreation and education potential to be considered in any future peatland restoration plans. Upgrading traditional routes/old access roads could be considered to facilitate recreational access. Any installation of access facilities may not be desirable or feasible for every site and would need to be landowner led.

Do you agree with the strategic objective?

Yes

Do you agree that the actions listed will ensure the strategic objective is achieved?

Yes

Please provide any further comments on the objective and associated action?

Currently, public understanding of what peatlands are and an appreciation of why they are important is limited. We need the public to understand why restoration work needs to be carried out on their local peatlands (including removal of trees, which may appear counter-productive to dealing with climate change). We need people to support a shift away from peat compost and we need to change the perception of bogs and peatlands as barren, unproductive wasteland.

Action 33 Peatland Communications

An ambitious awareness raising campaign using the full range of available communication methods (i.e., face-to-face, printed media, tv/radio and social media) will be essential if we are to see the desired shift in public attitude towards peatlands.

Organisations like NFFN are well placed to engage with the public to help illuminate the stories, cultural connections and societal benefits that we derive from peatlands. Awareness campaigns can help to create local connections to the nature that thrives on our bogs and inspire communities to take ownership of protecting, restoring and managing these precious habitats.

Furthermore, many people in rural Ireland have a deep cultural attachment to their peatland habitats, having grown up close to bogs with generations of families involved in activities, such as peat cutting for turf. It is vital that we can effectively communicate the wider value of peatlands to local communities, to demonstrate that the natural benefits we derive from them far outweigh any short-term gains from peat extraction.

Actions 34 and 35 Access for Recreation and Education

NFFN would argue that there is a balance to be struck between allowing public access to peatland sites for educational and recreational purposes and ensuring that nature is protected from disturbance. Access must therefore be sensitively managed. Measures such as boardwalks, which can be seen at sites such as Peatlands Park and on Cuilcagh Mountain, help to protect the peatland flora and fauna whilst providing safe access for people. There may be scope for upgrading ramparts or other traditional access routes to enable recreational access, however this would need to be looked at on a case-by-case basis, considering the carrying capacity of the site and potential for damage or disturbance.

Land managers should consider restricting access at certain times of the year for the benefit of nature, for example to protect breeding waders such as curlews which are vulnerable to disturbance and trampling.

Strategic Objective 6

Governance, Implementation & Funding

Target: The necessary structures are in place to deliver on the Strategic Objectives and Actions contained within the Northern Ireland Peatland Strategy.

Priority Actions:

36. Develop an Implementation Plan and Reporting Framework for the Peatland Strategy by 2022 with delivery phases, scale and sources of funding and reporting metrics identified.

37. Establish a Peatlands Partnership by 2022 – a multi-stakeholder group - to provide advice and support and to report to the DAERA Minister and the Northern Ireland Executive on the delivery of the Northern Ireland Peatland Strategy and the associated Implementation Plan.

38. Carry out a 3-yearly review on progress with delivery of the Northern Ireland Peatland Strategy and the associated Implementation Plan.

39. Secure long-term funding to implement Peatland SAC Management Plans and

Peatland Restoration Plans for sites outside the Designated Site Network.

40. Secure funding for landscape scale peatland restoration and deliver projects in partnership with local communities.

41. Promote the Peatland Code and help facilitate privately-funded projects, working with businesses to take them forward. (Peatland Code is a voluntary certification standard for UK peatland projects wishing to market the climate benefits of peatland restoration).

Do you agree with the strategic objective?

Yes

Do you agree that the actions listed will ensure the strategic objective is achieved?

Yes

Please provide any further comments on the objective and associated action?

Action 36 Implementation Plans and Reporting Framework

NFFN supports the view that the implementation plan and reporting framework should be completed by 2022 at the latest. As well as overseeing the delivery of actions contained in the strategy, reporting should also track progress against the overarching objectives. Measurable targets, milestones, delivery partners and costings should be clearly identified within the implementation plan. Statutory funding must be provided to enable effective delivery of the strategy and implementation plan.

Action 37 Peatland Partnership

Achieving effective peatland protection and restoration on the scale required would be an impractical and impossible challenge for any single organisation. Rather it requires multiple stakeholders working in collaboration to achieve shared goals and ambitions. A Peatlands Partnership should be formed, made up of public, private and non-government stakeholders, including academic experts, practitioners and landowners, to advise and support the delivery of the peatlands strategy and the associated policies and implementation plans.

NFFN would welcome the opportunity to be a partner in this newly established group.

Action 38 Review of Progress

NFFN agrees that 3 years is an appropriate timeframe for reviewing progress on delivery of the strategy and implementation plan.

Action 39 Funding for SAC Management Plans and Management Plans for Sites outside the Designated Sites Network

With most of our protected sites currently in poor condition, NFFN would urge the Northern Ireland Executive to provide funding as soon as required to deliver the management plans produced for SACs. Management Plans should not be restricted to designated sites to ensure that the vast amount of peatland that lies out with our protected areas, is restored and better managed to deliver maximum benefits for nature, climate and people.

Action 40 Long-term funding and restoration in partnership with communities

As already outlined, landscape scale peatland restoration will require significant long-term funding. Partnerships will be crucial to delivering landscape scale projects and local community support is essential. Local communities should be involved in the planning and delivery phase of any large-scale restoration projects to secure buy-in and enhanced community appreciation of the importance of peatlands.

Action 41 Peatland Code

NFFN is supportive of moves to seek more private financing for nature restoration. Investment in peatland restoration through natural capital markets clearly provides potential investment opportunities, through the accreditation and sale of the ecosystems services that healthy peatlands can provide.

The Peatland Code is a useful tool for securing more investment for peatland restoration, but it is crucial that carbon is not the sole focus of this. The nature-based aspect of peatland restoration must be considered, and projects cannot simply focus on maximising their carbon storage (or offsetting) potential. They should also consider other ecosystem services that peatlands provide, such as flood prevention and habitat provision for much of our declining nature. Benchmarking standards should also be developed to ensure that private sector financing for peatland restoration is delivered consistently and effectively and to avoid greenwashing.

Any other final comments on the strategy?

Peatland restoration has a vital role to play both in terms of storing carbon and providing habitats for many of our declining species. With 86% of our peatlands classed as degraded and only a 1% restoration rate over the last 30 years, an ambitious Peatland Strategy is desperately needed alongside adequate funding, to deliver landscape-scale peatland restoration and keep pace with neighbouring jurisdictions which have already pledged significant funding for restoring peatlands.

The language contained within the final strategy needs to be tightened considerably to demonstrate that Northern Ireland is genuinely committed to delivering an ambitious, landscape-scale programme of peatland restoration, and tackling key land use practices that continue to inflict irreversible damage on our peatland resource.

The peatland strategy should be viewed as a key delivery mechanism and investment priority for nature-based solutions. Furthermore, NFFN would recommend that the strategy and its associated targets should be embedded within the policies and programmes resulting from a future Northern Ireland Climate Change Bill and subsequent Climate Action Plan, as well as any future review of the WANE Act.

NFFN's members stand ready to play their part in transforming our degraded peatlands into nature friendly carbon stores, that provide a whole host of ecosystem services. What's required now is strong leadership, innovative thinking and long-term targeted funding to make this vision a reality.