



Irish Wildlife Trust  
Sigmund Business Centre  
8 Cabra Road,  
Dublin 7,  
D07T1W2

Alex Copland  
Bord na Mona,  
Leabeg, Blueball,  
Tullamore,  
Co. Offaly, R35 P304

March 23<sup>rd</sup> 2021

**Re: Submission to the Peatlands Climate Action Scheme (PCAS)**

Dear Alex,

The Irish Wildlife Trust (IWT) wishes to make a submission to the Peatlands Climate Action Scheme (PCAS) following your presentation to us in February last.

The IWT is very supportive of this initiative and commends Bord naMóna (BnM) for the scale of ambition being demonstrated. We hope it can go even further to encompass all of the land held by the company. We note that the Programme for Government (2020) contains a commitment to:

“Ensure that Bord na Móna is required to take into account climate, biodiversity, and water objectives, as they deliver on their commercial mandate, through an amendment to the Turf Development Acts 1998.”

We acknowledge that approximately 15,000 hectares of BnM land has already come under rehabilitation and with the roll out of PCAS the total area will be substantial, even if potential for greater gains exists.

The goals of enhanced climate action and biodiversity restoration are frequently complementary and the restoration of peatlands is a case in point. However, if the full benefits of carbon storage/sequestration and nature restoration are to be realised then the designation of these lands for that purpose, in perpetuity, should be promoted. Further commercial exploitation of these lands, e.g. for renewable energy developments, is not compatible with these goals and should not be pursued.

The EU's Biodiversity Strategy has called for the protection of 30% of EU land by 2030 and rehabilitated BnM land must surely fall into this network. The EU is also calling for 10% of land to be 'strictly protected', which we take to mean as falling into

IUCN Category Ia<sup>1</sup>. Currently very little (if any?) land or sea in Ireland falls under this category. The development of these rehabilitated peatlands gives us a tremendous opportunity to create this new category of protected area which can provide multiple benefits from scientific study to climate and amenity benefits.

The IWT suggests that a rewilding approach be taken to the longer-term management of the lands concerned, after hydrological regimes have been restored. In other words, we should let nature decide what the best vegetation is for any given patch of land (not including invasive species).

The rehabilitation of the degraded Midlands' peatlands presents perhaps the greatest opportunity for wildlife restoration in Western Europe today. We urge BnM to join the [Rewilding Europe](#) network, a move which could allow for collaboration with other similar projects as well as benefiting for wider public engagement with the potential for rewilding to address the biodiversity emergency.

PCAS has been developed primarily as benefiting greenhouse gas reductions. We believe that it should also have a strong biodiversity restoration focus. This could be achieved by developing a species reintroductions programme for the new wetlands with a focus on species which are extinct from Ireland or which are locally/regionally extinct. While natural recolonisation of some species may arise if suitable habitat is available (e.g. cranes, marsh harrier, curlew, red grouse, lapwings etc.) the urgency of the biodiversity crisis means we should be taking a more proactive approach to rebuilding populations of these species over a shorter time period.

This should also examine the feasibility of introducing beavers to Ireland, given their demonstrated effectiveness as ecosystem engineers.

For maximum benefit, BnM should allow for public participation in the future management and monitoring of rehabilitated boglands. The success of community participation can be seen at Abbeyleix Bog where invasive species are being controlled and the extent of high value habitat is expanding. This could be done through the creation of community-led National Nature Reserves which not only help to reach national and EU targets but foster a sense of ownership and stewardship of these areas.

We hope that biological monitoring of the recovering land is undertaken, something that would be of great scientific and educational interest into the future.

The IWT hopes that as turf mining is phased out across the country, that these rehabilitation areas will join together with other land restoration projects (riparian corridors, new native woodlands, nature-friendly farming etc.) to create a new and vibrant landscape for both people and nature.

Thank you for taking our viewpoints on board.

Yours sincerely,

Pádraic Fogarty (campaigns officer).

---

<sup>1</sup> Strict Nature Reserve: Strictly protected for biodiversity and also possibly geological/geomorphological features, where human visitation, use and impacts are controlled and limited to ensure protection of the conservation values.