



**Submission Re: Key Issues Consultation Paper in Relation to a Review of the
use of Peat in the Horticultural Industry.**

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Submission by:

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Introduction

The Irish Farmers' Association is the largest national representative organisation in the country, with over 72,000 members. We represent farmers in all sectors through our democratic structure of 29 County Executives and our ruling body the National Council, on which each county and each commodity is represented. IFA represents farmers with Government, agri-business and retailers. Through our Brussels office and affiliation with COPA-COGECA, we maintain a full-time presence at EU level on behalf of Irish farmers.

IFA welcomes the opportunity to present a submission re.: **Key Issues Consultation Paper in Relation to a Review of the use of Peat in the Horticultural Industry**. This consultation will have direct relevance to Horticultural producers but will also be of indirect concern to grain, poultry and forestry members. The IFA Horticulture, Grain and Forestry Committees represent the views of these respective producers.

The IFA Horticultural Committee is comprised of a number of sub-committees namely the Soft Fruit, Field Vegetable & Protected Crops and Mushroom Committees. Each sub-committee has its own separate chairperson. In addition, the Irish Hardy Nursery Stock Association (IHNSA), which is the representative body of nursery stock, tree and bedding plant producers, is a commodity sector within the Horticulture sector of the IFA.

The Irish Horticulture sector is a significant contributor to the Irish economy with a farm gate value of €437 million. It employs an estimated 6,600 while a further 11,000 are employed in downstream businesses. Of the total €437 million output, the output value for the sectors that use peat as an input are, Mushrooms €117m, Protected Fruit €38m, Protected Vegetables €29m, Nursery Stock €36m and Protected Ornamental Crops €19m. In recognition of the trend towards plant-based diets the Report from the Oireachtas Joint Committee on climate action, has recommended expanding the Irish Horticulture sector to avail of opportunities for import substitution and farm diversification.

Although the Irish Tillage sector is not specifically mentioned in the review it depends significantly on the mushroom compost sector as an outlet for 130,000 tonnes of mainly wheaten straw per year. This sector already has seen a decline of 20% in planted area since 2008 so a loss of this market would have dire consequences for the sector. Despite the decline in acreage, tillage farming has a farm gate value of €400 million and underpins Ireland's export-orientated livestock, dairy and drinks sectors. In relation to climate change and the environment the sector has the lowest carbon footprint of the main farming sectors.

The poultry industry depends on the mushroom sector as an outlet for over 50,000 tonnes of chicken litter per year. This use of poultry manure in the mushroom compost industry is an excellent example of waste valorisation within the bioeconomy.

Farmers involved in farm forestry depend on native tree nurseries for planting material. Peat is the substrate of choice for these nurseries.

The IFA is aware of the environmental, and societal importance of peatlands along with their economic value. As one of the members of the Peatlands Council, which oversaw the drafting of the National Peatlands Strategy we are committed to working with all stakeholders to review the use of peat in the Horticulture Industry.

While cognisant of the environmental importance of peatlands and the need to look at alternative substrates for use in the horticulture sector, unfortunately there is no viable alternative to peat at the moment in sections of the commercial horticulture sector. Where the few and limited options are available, they may have cost or sustainability issues which leave their widespread use impractical. If alternatives are to be found then there must be considerable resources directed to this area combined with a public campaign to highlight the probable extra cost to the consumer as a result.

As a major segment of the Irish Horticulture sector relies on peat, particularly the mushroom and ornamental sectors any cessation to the use of peat would have severe negative effects. Producers would either have to close their business or import peat, which would add extra cost to their business. In the current market environment, it would be impossible to retrieve these costs from the market. This would also have adverse knock-on effects for the tillage, poultry and forestry sectors resulting in a considerable blow to the rural economy.

It would be unacceptable and hypocritical to ban the use of peat in Ireland while importing it from another EU or third country. In addition, an integral part of government policy in dealing with the issues of climate change is to expand and not to undermine the Irish Horticulture sector. The demise of the horticulture, tillage or forestry sectors in Ireland, would certainly hinder Ireland in meeting its objectives and obligations relating to air, climate, water, nature and the environment.

It is important to put in context, the amount of peat which is extracted for use in the horticulture sector as a percentage of the overall peat area in Ireland. According to industry sources there are currently 5,500 ha of peatlands harvested for the production of peat for horticulture. These will emit 33,000 tonnes CO₂ or 0.055% of total 2020 emissions. In general, much of the peat used in the horticulture sector is recycled in some form and does not carry the same environmental impact as using it as a source for power generation.

Notwithstanding the problem of finding alternative substrates for use in the Horticulture sector, IFA as the main grower representative organisation will continue to collaborate with all stakeholders in an effort to find solutions to the issue. However, in the short term we think more can be done in the restoration and rehabilitation of existing bogs. There are also issues regarding the granting of planning permission and licensing of existing and potential peat extraction points. If fair and practical regulations could be introduced in this area, without inhibiting the ongoing harvesting of peat for horticultural purposes, it would be a positive start to the process of responsibly managing Irish peatlands to optimise their environmental, economic and social contribution.

Public Consultation Questions

A. What are your views on what more could be done to support and enable the switch to peat free horticulture at professional crop production level and consumer level?

Professional growers within the commercial horticulture sector operate in a business and market environment which is constantly evolving and are acutely aware of the need to seek an alternative to peat. They are familiar with the need to tolerate and deal with change whether that is imposed by regulatory authorities or the needs of the market. However, it must be emphasised that for certain crops there are no viable, alternative options at present.

If growers are to even consider the switch to peat free substrates, there must be considerable research and advisory resources dedicated to the reduction in peat use. Currently we have little research being undertaken in this area and are depending on international sources for any progress in this area. This deficit in the resources dedicated to advisory and research in the Irish Horticulture sector must be addressed immediately and, and will require major changes to existing state policy.

It must be recognised that Ireland cannot be taking unilateral decisions on policy issues which are not implemented throughout the EU. We already have many examples where the Irish horticulture sector operates at a considerable competitive disadvantage to their European counterparts. Policy makers must ensure that there is a level playing field for Irish Horticulture producers.

In addition to support from state agencies, any potential switch over from peat will need the support of the consumer and retailers. In a policy environment of cheap food and with no legislation in relation to unsustainable discounting of fresh produce, it is impossible to retrieve the extra costs or yield reductions which may arise in the changeover from peat. IFA have first-hand experience of retailers implementing strategies in relation to the environment and climate change but neglecting to inform the general public of the extra costs associated with these initiatives. In general, retailers expect the primary producer to foot the bill for any extra costs associated with these strategies. There is a need for a public campaign, to increase consumer awareness regarding the costs of implementing practices at producer level which benefit the environment.

In relation to the amateur user the switch to alternatives is not as critical as in general there is no commercial aspect. Therefore, there is more scope regarding the use of mixed products and alternatives particularly in relation to soil conditioning.

B. What are your views on alternatives to the use of peat in the Horticultural Industry (from, for example, the perspective of the professional grower or consumer/amateur gardener)?

The alternatives to the use of peat are sector specific within the horticulture sector and these are dealt with below.

Mushroom Sector

On a value basis this is the largest sector within the Irish Horticulture sector with an output of €117 million. It is also the most important in relation to exports, with 90% of the production is exported to the UK. It is estimated that the sector employs 3500 people. The sector is also important to the Irish tillage and poultry sector as 30,000 tonnes of straw and 50,000 tonnes of poultry litter per year, are used in mushroom compost industry.

Teagasc estimate that peat usage for the Irish mushroom industry is 113,000 m³ per annum. Peat is used within the industry to form a casing layer which is placed on top of mushroom compost in the growing houses which forms a casing layer. Along with the compost, it is the vital component in the mushroom growing process. Irish mushroom growers predominantly use a black heavy peat taken from lower levels of the bog.

In recognition of the issues regarding the use of peat, the industry is constantly researching alternatives. They have also looked at methods of reducing the use of peat and recycling the product. However, to date no viable, commercial alternatives have been found. In addition, mushrooms like much of horticulture industry is a high

output, low margin business. Even minor changes to the production systems which reduce quality or output will have immediate impacts on the viability of the business.

Apart from the harvesting of the mushrooms in Ireland, the rest of the process has become very automated, particularly the filling of mushroom houses with compost and the peat casing. Specialist machinery has been designed over many years so that this job can be done simultaneously. If an alternative casing product was to work effectively it would also have to fit this system, otherwise the current processes would become obsolete. This would result in millions of euro being required for reinvested into a different system. In addition, if Ireland was the only country forced to use an alternative product to peat, it would not make economic sense for machinery companies to introduce customised machinery for the Irish market alone. Again, this illustrates the danger of Ireland taking unilateral action in relation to the use of peat in horticulture.

When referring to the environmental impact of using peat in the mushroom sector it must also be recognised that the sector plays a positive role in the bioeconomy and in waste valorisation. By using poultry manure in the composting process the sector is reusing and adding value to this product. Spent mushroom compost from growing houses which also contains the peat, is where possible, spread on land from where the straw used in the compost process was originally sourced.

Ornamental and Amenity horticulture

The ornamental sector was valued at €74 million in 2017. Along with the mushroom sector it is the only other horticulture sector which currently has significant exports. There is considerable potential for expansion due to Ireland's unique plant health status. This sector includes major producers in bedding and pot plants, hardy nursery stock, perennial growers and field tree producers.

Although peat is still the main choice for growers in this sector, in comparison to the mushroom sector there is scope for using some alternatives mainly as a blend with peat. In the main, growers have integrated these alternatives into their systems due to the commercial benefits which they offer. For instance, the material coir is used as it improves drainage capacity in containerised production.

Unlike the mushroom sector there has been significant progress and technical knowledge developed abroad using other materials like wood bark and fibre, which is used more widely where peat is less available. However, peat is still the most desirable growing medium for most ornamentals in Ireland. It is a perfect growing medium due to its physical, chemical and biological properties.

The use of composted green waste, coir and biochar have been considered the most suitable options to date however the use of green waste in particular has severe issues due to its inherent properties. One of the main challenges in relation to green waste would be in its consistency due to the variability of its original constituents and composting process. Mushroom compost for instance is produced on a scientific basis, where specific constituents are analysed and blended to a uniform and defined standard. This blend is then put through a composting process which is computer controlled and constantly monitored to ensure that a perfect product is produced which conforms to exact physical, chemical and biological characteristics. The same cannot be said for green waste which can have varying constituents and would not have the same exacting compost process. Therefore, it would not be suitable for widescale use in commercial nursery operations where an exact growing medium is required. It certainly would have some use in the amateur market however, there may be issues with

human health etc. as the compost process may not be sufficient to leave the final product sterile particularly where biological waste is part of the original constituents.

Similar to the mushroom sector there will be difficulties in replacing peat due to the nature of automated systems which have been developed which are based solely on the use of peat. Growers and advisory services have developed technical knowledge regarding the use of peat therefore it will take time and investment to gain that knowledge of other growing mediums.

Vegetable sector

The vegetable industry is worth approximately €74 m. According to the 2015 National Field Vegetable Census there are 165 producers growing 4,267 ha. The sector provides 1,106 full-time equivalent jobs. The top five vegetables grown are carrots, cabbage, broccoli, swedes and cauliflower. With the trend towards plant based healthy diets, the potential of import substitution and other issues around Brexit etc. there is considerable scope for expansion.

The use of peat in the vegetable industry is confined to plant raising using modules and blocks and to the expanding microgreen sector. Brassicas and leeks are raised in modules, celery in modules and blocks and lettuce in blocks. Most growers buy in their requirements from specialist propagators. There are six plant raisers on the island of Ireland. It is estimated that approximately 2000 m³ is used per annum in raising vegetable transplants and in the microgreen sector.

Many years of research into optimum blends for plant propagation have resulted in the development of these various peat products used for raising plants for transplanting and microgreens. The products have been developed to optimise germination, handling, transplanting, pest and disease control, watering, nutrition and ultimately profit margin.

Again, there are no alternatives in the market and any peat substitutes or blends will need to have similar characteristics to be able to give the uniformity of growth in modules or handling ability of blocks, which is currently available from peat composts. The characteristics of peat for this purpose are unrivalled. Vegetable propagation and microgreens uses a very small percentage of the peat volume that is currently used in horticulture. The material that is used is critical for the sector and has been developed into a very particular product for plant propagation.

Soft Fruit

The Irish soft fruit sector is worth €45 million to the national economy. Over 90% of the crop is now grown on substrates under some form of protected structure. Many growers have switched from using peat to using 'coir' or 'coco peat due to it's physical and chemical attributes.

This is a substrate produced from the discarded husk of the coconut and is imported from mainly Sri Lanka and India. This substrate obviously has to be imported over vast distances and there can be issues with availability and quality issues.

Wood fibre and bark has been trialled as a substrate in the sector usually as a part of a mix with peat. However, there have been mixed results with many suffering plant losses due to the tendency of the products for water retention and excessive uptake of nutrients.

Notwithstanding the issues with coir and the need for retention of peat as a substrate this is an example where a sector has partially moved to a different substrate as there was no negative affect on the economic sustainability of the business. In addition, it has not resulted in significant extra cost to the business and could be integrated with existing infrastructure and growing systems. Nonetheless some soft fruit producers still rely on peat as their main substrate of choice while others use a mix of both.

Although peat cannot be reused or recycled on farm for fruit production it can be collected and recycled for other uses.

C. What are your views on whether Ireland should cut back or cease the export of peat for use outside of Ireland even if this would result in job losses in Ireland?

As much of the peat produced in Ireland for use in the horticulture sector is exported, the industry depends on this for critical mass. If the peat and mushroom casing companies were to just rely on production for domestic purposes it would undoubtedly leave them unviable.

D. Do you consider that a working group should be established to advise on how best to overcome the barriers to reducing peat use in professional horticultural crop production and in the amateur horticultural market?

Yes, a working group should be established to advise on how best to overcome the barriers to reducing peat use in professional horticultural crop production and in the amateur horticultural market.

E. If you are in favour of the establishment of a working group, which stakeholder groups do you think should be represented on it?

The stakeholder group should include representatives from the relevant IFA committees namely Vegetables and Protected Crops, Soft Fruit, Irish Hardy Nursery Stock Association (IHNSA) and Mushrooms. In addition, all other industry stakeholders, Teagasc, Bord Bia and all relevant government departments should be included.

F. How do you think that those involved in harvesting peat for horticulture could be compensated for any loss arising from a cessation of this activity (for example, on the basis of the profit loss arising or related to the value in ecosystem services retained/provided)?

This would be an extremely difficult scenario to envisage, as it would also have devastating direct consequences for much of the horticulture sector as detailed above

G. How do you think that those involved in harvesting peat for horticulture could be guided towards alternative activities, for example, developing an environmentally suitable alternative material that could replace peat in professional horticultural crop production?

For reasons detailed above it could be difficult to find viable alternatives which would also have to be located in proximity to the existing businesses. Many of the companies harvesting peat would also not have the scale or capital to invest in any potential alternatives.

H. What do you consider the value of peatlands to be to (please score out of 100): carbon storage nature conservation the provision of ecosystem services the economy social and cultural needs.

IFA believes that a balanced and holistic approach is needed to address this complex issue and it is difficult to just concentrate on just one or two of the positive attributes of peatlands in isolation of others.

I. In your opinion should the use of peat within (i) the amateur horticultural market and (ii) the professional horticultural industry be phased out over the next 3, 5, 10, 15 or 20 years and if so, how should this be done bearing in mind the potential job losses and the difficulties with alternative growing media?

It may be possible to phase out the use of peat or at least significantly reduce it's use in the amateur market in the short to medium term. However, regarding the professional horticulture industry, due to the issues outlined already, and the current absence of research, it is impossible to say that peat can or should be phased out in a definitive timeframe.

J. Does more need to be done to educate and build consumer awareness of peat free products which are available at retail level? Submissions may be made in relation to these questions and/or on any other issue

Yes, more must be done to educate the consumer through public campaigns to increase awareness. The consumer must be informed that changes in horticulture primary production which benefit the environment, will in many cases result in higher retailer prices for the products produced from the sector. This must be undertaken by state agencies to give an independent and complete view. As already outlined above, many consumer facing businesses such as retailers often use these issues to gain commercial advantage rather than trying to genuinely educate the consumer.