

Response ID ANON-JXUZ-QRCR-9

Submitted to Northern Ireland Peatland Strategy 2021-2040

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Introduction

1 What is your name?

Name:

Ian Garner

2 What is your email address?

Email:

ian.garner@ulsterwildlife.org

3 What is your organisation?

Organisation:

Ulster Wildlife

Scope of the Northern Ireland Peatland Strategy 2021-2040

4 Do you agree with the scope of the strategy?

Yes

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?:

Ulster Wildlife is broadly supportive of the Strategy and welcomes the opportunity to comment on this strategy and the aim of protecting and conserving our vital peatland resources.

It could be helpful to remove 'prioritised'. Including 'prioritised' in the Scope could be read as an implied end point. It should be clear that the scope will go beyond prioritising [for restoration] and include collateral outcomes, such as for climate change resilience, and as set out in the Vision and Aim, eg related to ecosystem services. .

IUCN in its UK Peatland Strategy 2018-2040 succinctly refers in its 2040 Target to include 'peatland in good condition, under restoration or being sustainably managed'.

A suggested revision to the scope could be:

[The scope of this strategy] includes peatland with semi-natural vegetation and peat soils that can be managed as peatland in good condition, be under restoration or is being sustainably managed, whether publicly or privately owned.

This approach would also concur with the Vision and bring Actions Strategic Objective 1 into scope.

Vision of the Northern Ireland Peatland Strategy 2021-2040

6 Do you agree with this vision?

Yes

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?:

Ulster Wildlife is broadly supportive of the Strategy and welcomes the opportunity to comment on this strategy and the aim of protecting and conserving our vital peatland resources.

A 'vision' usually implies clear intent. 'ensuring' is not needed for this intent to be clear.

The context of 'where possible' is confusing and potentially ambiguous with uncertainty on what criteria would be applied and actual commitment to the vision being conditional. It is suggested that 'where possible' is removed.

To make the Vision proposed clearer, it could be revised to:

The vision of this Strategy is that [our peatlands] are protected, enhanced [c/o IUCN], and sustainably managed so that they can maintain their natural functions, biodiversity and ecosystem services.

Similarly, in the IUCN UK Peatland Strategy 2018-2040 there is recognition in its Vision of peatlands' intrinsic value and public benefits provided. This could also be crafted into the Northern Ireland strategy.

Aim of the Northern Ireland Peatland Strategy 2021-2040

8 Do you agree with the aim of the strategy?

Yes

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?:

Ulster Wildlife is broadly supportive of the Strategy and welcomes the opportunity to comment on this strategy and the aim of protecting and conserving our vital peatland resources.

The principle of this Aim overall is understood. As set out it mirrors the Vision and Scope and repeats many aspects, but the detail in the strategy document that supports this Aim is lacking focus beyond ambition by the end-point of 2040, rather than indicating a trajectory along which this aim will be fulfilled.

As with all near-20-year horizons, there would be more confidence in the Aim if more specific and time-bound (SMART) milestones or interim positions were set out to support the commitment to act. It is noted that on p10 there is a stated intention to 'develop a robust NI Peatland Strategy Implementation Plan' where these aspects of SMART targets are identified, but in general the absence of insight on any of these in the list of 48 priority actions in this draft makes the Aim difficult to assess.

As an example of setting out ambition, the 2021 CCC Report on progress to Parliament set out a recommendation for an upwardly-revised annual area of UK peatland requiring restoration – to at least prevent further emissions of GHG – of 67,000ha from 2025. For NI, based on the currently estimated area of damaged or degraded peatland and as a proportional share (8%) of the UK total peatland area, this equates to ca 5,500ha/annum. If this rate was applied for the term of the Strategy, this would provide a target of at least 82,500ha by 2040. This would be conservative against an estimated over 218,000ha damaged or degraded, yet indicate sufficient ambition.

A headline quantitative Strategic Target could be:

'at least 82,500 hectares of peatland or peat soils in good condition, under restoration or being sustainably managed' (after IUCN UK Peatland Strategy 2018-40)

In general, the detail in the draft strategy does not give clarity on the Aim, what can be 'acknowledged and appreciated', by whom, and to what level. 'Where possible' is vague, and the terms 'acknowledged and appreciated' are vague. There are no reference values for achievement; something that would show understanding of the nature of the overall societal benefit, such as for climate change mitigation and adaptation. The range of ecosystem services are mentioned in the main body, but there is no indication of the scale of benefit:cost outcomes. There is evidence from CCC reports over recent years, and in particular in 2021 (Independent Assessment of UK Climate Risk. Advice to Government. For the UK's third Climate Change Risk Assessment (CCRA3)) where benefit:cost ratios for peatland restoration towards climate change mitigation and adaptation are between >5 and >10. This could be used to set out the scale of the opportunity and make the case for action. In addition, to deliver these ecosystem services, which are largely public goods, peatlands must be managed. This also carries a financial cost and commitment. Equally, landowners who deliver the ecosystem services need to be rewarded accordingly.

It could also help to set out how this Aim can influence or apply within other Departments' own policies and plans for 'green growth' and climate change, where realising the benefits of the ecosystem services mentioned in the strategy could be set out. These ecosystem services will become key operational and planning considerations in other parts of DAERA, in other Departments, their Agencies and companies. Businesses would also have interests, eg insurance sector and consulting engineers

It is a wide-reaching Aim and much will depend on the level of ambition, trajectory for achievement, and commitment through levels of investment and effective delivery mechanisms. The strategic objectives do not show commitment to progressive milestones beyond the overarching Target statement, some of which are not time-bound.

Strategic Objective 1

10 Do you agree with Strategic Objective 1?

Yes

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

Yes

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?:

Objective:

The objective is a necessary ambition as part of the Vision. NI peatlands are significantly impacted through varying management actions that have been influenced by government policy and national need over many years and sometimes, generations. Their role in ecosystem services and as carbon stores is vital towards NI maintaining its obligations for biodiversity, species protection and towards supporting the UK meeting its net zero carbon emissions target by 2050. This objective is in line with wider UK policy on peatlands, reflected in the IUCN UK peatland strategy 2018-2040. It would be helpful to clearly set out a measurable target committing to maintaining and protection peatlands through restoration and appropriate and proportionate management and investment. This will be vital to secure the future of our peatlands and their wide range of ecosystem services.

In relation to the overall target for the objective the timeline fits the strategy vision.

The target is not sufficiently described in the Strategy and in the absence of milestones could be seen to lack ambition.

If the target was described as an outcome there would be scope to set out some milestones that will help drive and direct activity in delivery, one of which could relate to an outcome for 2040. Inferring a window of 19 years before any accountability for monitoring its achievement leaves it vague.

For the Actions:

For all the Strategic Objectives' Priority Actions: Ulster Wildlife recognises the need for a range of Priority Actions to set out delivery. With qualified support for the Actions overall, some observations are offered here noting that the merit of the Priority Actions as set out and their execution will be dependent on an effective Implementation Plan (p10). Comments here are intended to support that later development. It is good to note that for implementation it will be a long-term programme requiring sufficient funding. Without this commitment there is a risk that priority actions could become aspirations.

For the actions listed against this objective, it is noted that some are partly in progress. None of the listed priority actions have any time reference to guide their place in any priority rating, with some clearly with dependency on completion of others before they can be either commenced or completed.

For specific actions, it is noted that for Action 1 re 'Register of Peatlands', there is currently an exercise underway (Accelerating Peatlands Restoration project - Ulster Wildlife leading) to map the location, characteristics, extent, volume and condition of peatlands in NI. This will support this action and support delivery of Action 10 in Strategic Objective 2.

Action 7, The threat of the increase in natural, accidental or deliberately malicious wildfires through the increase in fuel loading on poorly managed peatlands is a key risk. Experience on developing wildfire management plans has been gained by Ulster Wildlife's CANN project, which is aimed at protecting and restoring peatlands and this is seen as an important aspect requiring effective guidance.

In addition to wildfires, there could be mention of management or policy of current planned burning as an action. The CCC Joint Recommendations to Parliament Report (2021) includes a revised recommendation [to defra] that legislation is introduced to ban rotational burning to all peatland by 2021. This approach can be introduced in Northern Ireland as a milestone, rather than remaining a 'developed approach'

Equally, there is scope for instances of benefits within plans for restoring grazing land through properly advised one-off controlled burning, to bring vegetation into favourable condition which, going forward can then be maintained by appropriate grazing regime and not require any further burning, and thus not be rotational burning.

Action 8, it is important to include clear reference to the evidential links between nutrient management activities that influence and lead to ammonia exposure. However, an Ammonia Strategy is wider in scope than peatlands and should be a separate commitment and not rely on the implementation of a peatlands strategy to be produced. It is clear that reducing or eliminating ammonia emission is a critical factor in protecting peatlands and to restore their condition and also that within an ammonia strategy there is a critical need for cross-border management, cooperation and combined management approaches for it to be successful.

Action 9, flood mitigation and water quality policy areas could also be included.

Strategic Objective 2

13 Do you agree with Strategic Objective 2?

Yes

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

Yes

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?:

On the Objective and Target:

Target: to ensure that by 2030, degraded peatland habitats are prioritised for restoration to favourable conservation status and that by 2040, all high

priority degraded peatlands will be under restoration management

The target is not sufficiently described in the Strategy and in the absence of milestones could be seen to lack ambition

The pace of outcome for this objective is unambitious. The target of 2030 will benefit from milestones to indicate this is hopefully intended as a 'rolling' process of implementing restoration activity, and not an end-point before further action on any peatland.

In setting out the a need to fully assess climate change risk to sites prior to the prioritisation for restoration

As per the limits of how commitments in the action plan for strategic objective 1 are set out, this also applies for this objective.

On the Actions:

For all the Strategic Objectives' Priority Actions: Ulster Wildlife recognises the need for a range of Priority Actions to set out delivery. With qualified support for the Actions overall, some observations are offered here noting that the merit of the Priority Actions as set out and their execution will be dependent on an effective Implementation Plan (p10). Comments here are intended to support that later development. It is good to note that for implementation it will be a long-term programme requiring sufficient funding. Without this commitment there is a risk that priority actions could become aspirations.

There is a good body of evidence and practice related to peatland restoration. It could be helpful to include clear intent to build on the evidence base available and what is known by practitioners. This can be drawn on to inform, help achieve or fast-track many of the actions.

Many of the Actions will require significant resources and appropriate skills and it would be wise not to underestimate the effort and levels of competency required to be successful in meeting the objective along with the number of individuals with these skills needed to achieve outcomes at scale. There will also need to be provision for post-restoration management for emissions reduction/prevention from peatlands to be sustained and monitored.

Action 10 scope should include full assessment of climate change risk to sites as part of the process developed for prioritisation.

Action 11 is a large task and will comprise a range of activities and dependencies, including resources and capital. Having some indication of timeline and commitment in the main text would be of benefit. It would also help to outline appreciation that peatland restoration through rewetting, revegetation, and in some cases re-profiling, is a capital-intensive operation and sufficient additional funding will need to be made available through targeted support. For example in Scotland, building skills capacity among specialist advisory teams and contractors is given priority.

This will require a significant amount of stakeholder engagement which could be stated in the strategy. For landowners outside designated sites, experience gained in the CANN project indicates that there will need to be a proper allowance of lead in time needed to effectively engage with landowners

Action 12 is vague, lacking a timeline and any relative reference of appreciation of scale. No overarching target has been stated for how much peatland will be restored or under management. Without clarity on the estimated benefits that would accrue, for policy, land use and ecosystem services. It is vital that a significant, assured, multi-annual funding provision is secured, and to illustrate benefit it would be helpful to have a benefit:cost ratio or factor to indicate the value of investment in restoration works.

There is evidence from CCC (2021) that peatland restoration delivers good value for money in terms of carbon storage, water quality, biodiversity and reduced fire risk, with benefit:cost ratios of >5:1 to >10:1 for peatland restoration in relation to climate change mitigation and adaptation (CCC adaptation report).

Action 14 - This should include buffer zones around forested stands to reduce the drainage impact and reservoir for encroaching invasive conifers/predators on to high priority peatland sites. Conifer encroachment dries out peat and they act as perching posts for predators of priority bird species nesting in peatlands. NIFS may have already completed this exercise.

Strategic Objective 3

16 Do you agree with Strategic Objective 3?

Yes

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

Yes

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?:

On the Target:

The target is not sufficiently described in the Strategy and in the absence of milestones could be seen to lack ambition.

On the Actions:

For all the Strategic Objectives' Priority Actions: Ulster Wildlife recognises the need for a range of Priority Actions to set out delivery. With qualified support for the Actions overall, some observations are offered here noting that the merit of the Priority Actions as set out and their execution will be dependent on an effective Implementation Plan (p10). Comments here are intended to support that later development. It is good to note that for implementation it will be a long-term programme requiring sufficient funding. Without this commitment there is a risk that priority actions could become aspirations.

The target is supported by a list of 8 actions, with only 2 time-bound. The actions have merit but there is no real setting out in the strategy of an appreciation of the scale of activity needed to successfully achieve the actions.

For example, for Action 17, the delivery of peatland restoration should include a recognition that some peatlands need specific actions to bring them into favourable condition. Practical experience indicates that one set of management prescriptions will not fit all peatlands and restoration approaches devised should be accompanied by effective longer-term management plans. These would avail of all available, appropriately researched and tested management options. For example, the principle of flexible management options moving towards a set of agreed outputs and targets within a partnership process, which involves the landowner, the ecologist and incorporates both the available scientific knowledge and recognises the generational experience should be applied.

Action 18 indicates a constraint to the deployment of government funding, which could be seen as capital funding. The 'infrastructure' required to support such restoration investment is not clearly set out in the strategy text to explain how this Action will be achieved. It lacks a basis in benefit:cost being illustrated in the strategy to signal the value and potential NPV of any such funding towards reducing carbon emissions from peatlands and increase in ecosystem services. (CCC Adaptation Report, June 2021)

Action 18 - Commonage is likely to be one of the biggest challenges to delivering restoration on the ground on some sites and should not be underestimated as a task. The CANN peatland project has gained experience of this and of the investment of a significant amount of project time required to achieve positive outcomes.

Actions 18 + 19 Both actions relate to funding but the distinction is not clear. There is experience of actual costs and the need for certainty of timely funds provision to support costs and cash flow. This has been gained in the UK and Ireland from peatland restoration work, through the CANN project, and from comments received on the operation of other peatland restoration programmes in GB, some of which are at landscape-scale. This suggests that as there is an urgency to restore peatlands, at least from the position of preventing GHG emissions from peatlands, clarity on funding mechanisms will be vital. Action 19 suggests there will be reliance on non-governmental funding to unlock government funding. There is no certainty of winning non-governmental funding or at what time and scale this will be achieved. This approach could put the Vision and any progress at risk.

For example, in England there are underpinning government funds for peatland restoration - within the 2021 England Peat Action Plan - that will sustain core elements of partnership programmes. This understanding of need is not indicated in the NI strategy and could leave any meaningful scale of progress and achievement vulnerable to delay and to be under-resourced or under-achieving.

Action 21 - Moving more quickly on this target would be desirable. CCC in its 2021 Report to Parliament sets out banning peat extraction for horticulture now. (check ref)

Strategic Objective 4

19 Do you agree with Strategic Objective 4?

Yes

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

Yes

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?:

On the Objective and Target:

The ambition to achieve this goal by 2025 is noted. Knowledge Sharing and Research is an essential aspect though it is not clear in the Strategy document how most of the actions will be achieved, but it is worth noting that research on peatland takes time to evolve results and the lessons and knowledge developed already should be applied.

The target is not sufficiently described in the Strategy and in the absence of milestones could be seen to lack ambition

The topic area is wide, and for example, in Scotland, a significant role for technical training and development is fulfilled by the Crichton Carbon Centre, supported by the Scottish Government and its Peatland Action Programme. The Scottish government also funds ClimateXChange to provide the appropriate level of research and applied knowledge development: advising the Scottish Government on where and how best to direct funds to gain the best benefit:cost return. Expert groups also support this work. For instance, the James Hutton Institute in Aberdeen provides specialised and bespoke research and technical support, such as mapping. The current NI peatland mapping work is being completed by JHI for the Accelerating Peatland Restoration project and partnership (supporting part-achievement of Action 1). This approach to delivery for this Objective demonstrates an effective model for quickly effecting and achieving a number of the outcomes, and highlights a key function that the proposed peatland partnership should lead.

On the Actions:

For all the Strategic Objectives' Priority Actions: Ulster Wildlife recognises the need for a range of Priority Actions to set out delivery. With qualified support for the Actions overall, some observations are offered here noting that the merit of the Priority Actions as set out and their execution will be dependent on an effective Implementation Plan (p10). Comments here are intended to support that later development. It is good to note that for implementation it will be a long-term programme requiring sufficient funding. Without this commitment there is a risk that priority actions could become aspirations.

Resourcing this range of activities to achieve meaningful impact is again critical and winning and supporting resources should be stated as an action. For some actions, eg Action 24 There is a substantial and still growing body of research on peatland across the UK and Ireland. The lessons of which are readily applicable here and can be implemented and augmented with local research, much of which is available from eg the CANN and Glenwherry Hill Regeneration Projects (GHRP)

Action 25 This is strongly supported in principle and is a gap noted during delivery of the CANN project.

Regarding Action 26. This has been commenced within the Interreg CANN project, supported by DAERA. This is an established skills and knowledge base that can be built on. There is also a risk of losing this skills base if clear funding commitments are not made with urgency.

Regarding Action 28. There is no mention of the Glenwherry Hill Regeneration Project despite the volume of knowledge and experience it has delivered over almost 15 years. Many valuable results and key messages are available.

These experiences should be acknowledged and utilised to build on the actions listed and tested under controlled conditions at demonstration sites across the province.

Action 31 - Ensure and adequately fund long-term monitoring of restoration works, including pre-restoration monitoring. This is extremely important if we are to measure the success of the peatland strategy. There is a huge gap across the UK and Ireland of long-term monitoring of peatland restoration and the trajectory of restored peatlands, as the works are always done within funding cycles.

Strategic Objective 5

22 Do you agree with Strategic Objective 5?

Yes

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?:

On the Objective and Target:

This is a broad ambition as set out. It matches a similar Strategic Goal set out in the IUCN UK Peatland Strategy, but there is an absence of any time reference to meeting the objective and the intent would be improved with some SMART targets and actions

The target is not sufficiently described in the Strategy and in the absence of milestones could be seen to lack ambition

On the Actions:

For all the Strategic Objectives' Priority Actions: Ulster Wildlife recognises the need for a range of Priority Actions to set out delivery. With qualified support for the Actions overall, some observations are offered here noting that the merit of the Priority Actions as set out and their execution will be dependent on an effective Implementation Plan (p10). Comments here are intended to support that later development. It is good to note that for implementation it will be a long-term programme requiring sufficient funding. Without this commitment there is a risk that priority actions could become aspirations.

Most Actions appear to integrate with other Department activities under these topics, but there is not an indication that it is a developed objective.

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?

Yes

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?:

On the Objective and Target:

This is a critical objective and the draft implies that this will be addressed as soon as practicable.

The target is vague, lacking a timescale for completion. There is urgency for the actions listed as they will drive the delivery of the strategy.

On the Actions:

For all the Strategic Objectives' Priority Actions: Ulster Wildlife recognises the need for a range of Priority Actions to set out delivery. With qualified support for the Actions overall, some observations are offered here noting that the merit of the Priority Actions as set out and their execution will be

dependent on an effective Implementation Plan (p10). Comments here are intended to support that later development. It is good to note that for implementation it will be a long-term programme requiring sufficient funding. Without this commitment there is a risk that priority actions could become aspirations.

Action 36 is a key action.

The proposed peatlands partnership appears to have its scope and outline terms of reference set out. This could be premature. The scope for a peatland partnership will depend on ongoing research into partnership models which will provide options for approaches that will achieve the outcomes. As presently set out, there is a presumption that the format for the partnership will achieve the outcomes.

Any partnership must be properly resourced. Comparisons with other models for peatland partnerships in GB are being assessed as a basis of development and scoping. For example, for most GB partnerships, they comprise a core function that is focused on peatlands with a peatlands programme and resources dedicated to this. A multi-stakeholder group intended to advise, support and report (to) the DAERA minister does not reflect the example of most of the models of delivery successfully operating in GB. There is no mention of a putative peatland programme that such a group could support and report on.

Any partnership would benefit from operating independently from government and should possess sufficient resources and authority to direct and lead delivery of specified outcomes for the strategy.

Action 39- This commitment to long-term funding is welcome as this is vital for success, as the lead in time for these works is long. There should also be long-term funding for monitoring pre- and post-restoration. This should include recognition for the lead in time to engage and secure buy-in from stakeholders.

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?:

Other observations and notes

- It is important that NI urgently commences its ambition to match this scale, which will be a significant undertaking if NI is to make its contribution to the UK net zero target. NI peatlands presently store an estimated 39-58 years' of carbon, as Greenhouse gas CO₂eq, relative to NI total GHG emissions in 2018 (19MTCO₂eq). It is vital to have high ambition not to lose this carbon (and cancel out some of the emission reduction interventions made elsewhere, carrying their own high financial cost – such as building insulation or renewable energy supply).
- The case for the need to have a peatland strategy for Northern Ireland has been made and evident for some time. The other UK devolved administrations already have strategies and national peatland action plans in place, along with legislative and policy commitments in place to enable implementation actions plans to be developed, funded and commenced. None of the DAs appear to have underestimated the scale or urgency of the challenge. Plans set out the policy position and drivers, the time scale on which to restore and manage peatlands for climate resilience and for biodiversity, along with a range of other ecosystem services. They have put clear long-term funding commitments in place to enable progress to commence and experience drive further evaluation of required future mechanisms.
- The CCC carbon budgets for net zero carbon targets repeatedly emphasise the need for proper consideration of land use and land use change towards long-term protection and management of carbon reservoirs in our land and through its use. Peatlands have figured in this in no small measure.
- In the CCC Joint recommendations to Parliament (2021) a Priority recommendation (from 2021-2025) concerning four targets for land use for all UK administrations to have ambition for. Three of these are relevant to Northern Ireland:-
Extend current ambition set out by the UK government and the devolved administrations to: implement a comprehensive delivery mechanism to address degraded peatland:
 - 17% of upland peat is restored, equivalent to 200,000 hectares (and where this is not possible, stabilise the peat) by 2025; 58% by 2035 (700,000 hectares) and the remaining area by 2045.
 - Rewet 8% of lowland grassland area by 2025 (18,000 hectares), rising to 25% by 2035 (54,000 hectares).
 - Remove all low-productive trees (i.e. less than YC8) from peatland (equivalent to 16,000 hectares by 2025), and restore all peat extraction sites by 2035 (equivalent to 50,000 hectares by 2025)

This should be a key reference for framing proportionate, measurable strategic objectives in the proposed strategy.

- Current implementation plans must give regard to CCC UK carbon budgets recommendations on the scale of peatland protection and restoration required to support the UK net zero target. In June 2021 in its Progress report to Parliament the scale and rate of peatland protection and restoration was increased significantly – 67,000 ha/annum under protection or restoration by 2025. It is clear from research evidence drawn on in reports from the UK Committee on Climate Change that efforts to meet the UK net zero carbon emissions target that sustained annual action is required to meet any of the climate goals and not to defer action to near the end-point. This will also apply to goals for halting and reversing biodiversity loss, as well as commitments made by the DAERA Minister to support the goal of 30 percent of nature protected and conserved by 2030.
- There are a number of reference values for goals and action-led targets in CCC publications in 2020 and 2021. These could be drawn on to provide an understanding of scale and an appreciation of return on investment contained in the CCC reports reference previously
- Peatlands in good condition are exemplars and models to follow and should be included in the strategy as such. In addition, extending the scope of Action 1 to include all peatlands would be a better assessment of potential peatlands
- The draft peatland strategy must set out a clear and objective ambition that will give direction to the priorities and scale of action needed to fulfil NI obligations, need and opportunity to manage peatlands for climate change, and benefit from the wide range of high-value ecosystem services they provide.
- It is equally vital to recognise that with much of the estimated 88% of NI peatlands that are degraded or damaged are on land that is in private ownership and/or management, the approach to peatland protection and restoration will require significant buy-in and commitment from landowners if the strategy is able to achieve its goals at scale. How they will be rewarded and retained as committed stewards of new approaches to land use could be further set out. With the challenge of managing peatlands for the delivery of a range of ecosystem services it must be recognised that hill and upland farming is a key industry which will form the cornerstone of the Government's response to addressing the challenges which the agriculture industry faces in achieving its climate change and biodiversity commitments.
- Regarding grazing, there is much mention of the risk/damage from inappropriate grazing without reference to the beneficial effects of grazing or the

risk/damage from under-grazing. The reference to “inappropriate levels of grazing” is assumed to be wholly overgrazing. This is misinformation. Experience gained by EFS planners across NI suggests that approximately 70% of upland peatlands are under-grazed.

- Further, on grazing practice, where there is significant under-grazing of many peatlands this results in deterioration of many of the ecosystem services we wish to derive from peatlands, particularly biodiversity, climate change resilience. Conversely, an increasing propensity of the vegetation cover from under-grazing can increase the fire hazard.

- The nature of land ownership and use is also an aspect that could benefit from further comment, such as the challenges relating to multiple rights/ownership of some land, eg commonage, which has the potential to delay progress as interests are identified and contacted.

- The scope could also benefit from an outline of approach for restoration. For example, there is potential for a hierarchy to be set out:

A To restore damaged and degraded peatlands via a range of nature-based solutions, to reverse loss and reverse emissions, and increase the benefits provided by the ecosystem services that restored and properly functioning, managed peatland provides

B To monitor and manage restored peatlands

C To conserve and manage natural peatlands, noting that this will be to maximise the potential for ecosystem services to be provided, valued and measured to enable effective levels of reward for those providing them and public goods

- It is important to set out that post-restoration there will be a requirement for ongoing management of restored peatland to sustain its condition for the long-term, and that this is an intrinsic aspect of what comprises peatland restoration.

- The proposed peatland partnership – how this is established and operated/managed will be critical both to its effectiveness as the stated vehicle for much of the action plan delivery, and to its level of authority to operate and deliver. One that is fit for the needs of NI is critical, and there are a number of PPs in England to reference their operating models. Equally, there are state-led models. In Scotland – Peatland Action – led by Nature Scot; and a Wales Peatland Action Programme to 2025, that will be delivered by Natural Resources Wales. Both of the latter models draw in delivery partners and administer funding.

- For third-party funded state-led models there is anecdotal evidence of the administration being a bottle-neck for enabling timely and effective delivery. Reliance on competitive tendering or funding application calls can constrain timely awards and subsequent mobilisation. Peatland Partnerships in England each have a single remit – peatlands - and once funded and with a governance process operating are able to make strategic plans, use funds to leverage additional income and funding partners, and implement peatland management.