



IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA HÉIREANN

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2nd May 2025

RE:Pre-Draft Submission; Biodiversity Action Plan 2026 – 2031

Dear Biodiversity Team,

The Irish Peatland Conservation Council (IPCC) are an environmental non-governmental organisation with charity status (CHY6829) that campaign for the conservation of a representative sample of intact Irish peatlands for today's and future generations. The IPCC was established in 1982 and now holds 42 years of experience in this regard. Our work is guided by our 6th Action Plan "Ireland's Peatland Conservation Action Plan 2020" and a recent amendment "Peatlands & Climate Change Action Plan 2030", which focuses on the role of peatlands in tackling predicted climate change. These documents are available for download on our website at www.ipcc.ie. Many of the actions in our plan have been included within the National Peatlands Strategy which has been adopted by every Government Department and Local Authority. The "National Peatlands Strategy" can be downloaded from www.npws.ie.

Nationwide, peatlands are in a poor ecological state, as highlighted by Ireland's last Article 17 Report to the EU Commission in 2019 entitled "The Status of EU Protected Habitats and Species in Ireland" (National Parks & Wildlife Service, 2019) which describes peatland habitats "Raised bog (active)(7110)" "Degraded raised bog(7120)" and "Blanket bog (active)(7130)" as in "Unfavourable-Bad" condition and declining in structure and function with ultimately "Unfavourable-Bad" future prospects. Two fen habitat types (Cladium Fens (7210) and Alkaline Fens (7230)) have also been assessed as having an overall structure and function as "Inadequate and Stable" and "Bad and Declining" respectively.

Only 25% of Ireland's original range of peatland habitats are deemed worthy of conservation. 75% have become degraded from multiple pressures such as peat extraction, agriculture, forestry, development and habitat fragmentation (Ireland's Peatland Conservation Action Plan 2030, O'Connell, C.A, *et al*, 2021). Peatland originally accounted for approximately 1/5th (~1.2M ha) of the habitat in Ireland, yet with only 25% functioning ecologically and hydrologically Ireland has experienced heavy biodiversity loss, which the Government officially announced in 2019 by declaring a Climate and Biodiversity Emergency, only one of two countries to ever do so.

Ireland's Biodiversity Emergency

The IPCC recently conducted a desk study where we looked at the Species Redlists published by the National Parks and Wildlife Service which track changes and highlight threatened species in Ireland. The IPCC discovered that 18.8% of the birds listed as under threat within the Birds of Conservation Concern in Ireland utilise peatland, 60% of the Damselflies and Dragonflies listed within the redlists utilise peatland and 41.7% of butterfly species listed within the redlists utilise peatland. This emphasises the impact that the un-sustainable destruction of peatland landscapes (which represent ~21% of habitat in Ireland) has had on the wildlife of Ireland. Please see Ireland's Biodiversity Emergency Poster for more information.

County Kildare

Specifically, County Kildare originally held 24,317ha of natural peatland but this had been modified and damaged to the extent that only 2,981ha can be considered conservation worthy. This represents only 12% of the County's original resource. The peatland landscape of County Kildare includes 2,642ha of raised bog habitat and 339ha of fen habitat (Ireland's Peatland Conservation Action Plan 2030, O'Connell, C.A, *et al*, 2021).

40 YEARS TAKING ACTION FOR BOGS AND WILDLIFE

Charity Numbers/Uimhir Carthanacht: CHY6829 & RCN 20013547 Registered in Ireland No/Uimhir Cláraithe in Éirinn: 116156

Registered Office/Oifig Cláraithe: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland

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

Company Secretary/Rúnaí Comhlacht: Catherine Fitzgerald

Directors/Stiúrthóirí: Martin Kelly, Catherine Fitzgerald, Miriam Mooney, Kate Macnamara, John Pierce, Tiernan Murray, John Lynch, Eugene Dunbar

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

Tina Claffey, Monty Don OBE, Helen Conneely.

IPCC Peatland Sites Database

The IPCC manage a Peatland Sites Database, please see the attached excel spreadsheet (CountyKE_PeatlandSitesofImportance.xlsx) for a list of the peatlands within County Kildare and the accompanying data collated within the IPCC Peatland Sites DB. Threats and damages to the site are also listed where information is available. Missing info is not a sign of no threats or damage but most probably is missing data and there could still be threats/damages which need to be ascertained.

Fen

Fen is a peatland habitat that is under threat of extinction. Ireland once held 92,508ha of fen but this has been reduced to 19,592ha, this is just 21% of it's original extent. The most serious impact to fen has been from agricultural reclamation which involves drainage, fertilisation, reclamation and removal of peat. The IPCC Peatland Sites Database lists 13 sites within the County as containing fen habitat, highlighting it's importance to the County's native biodiversity resource. The National Parks and Wildlife Service are currently undertaking a National Fen Survey but the report is not yet published. This means that we are unsure as to what variety of fen habitat constitutes a representative sample and can not effectively conserve them or the species that utilise them. In this regard it is imperative that no loss of fen habitat occurs before we can ascertain its importance to biodiversity. The NPWS have published a Scoping Study and Pilot Survey of Fens and IPCC request that it is included and highlighted within the Biodiversity Action Plan (NPWS, 2021).

County Landscaping

The county's green-spaces and landscaped areas, such as areas surrounding retail outlets, industrial estates and the green-spaces within the towns and villages need to be cognisant that using peat is detrimental to the wild peatland habitats and species where it is extracted from. The County should strive to be completely peat-free and many Tidy Town organisations have already taken this on when improving and managing their local environment. Composting is also an important part of going peat-free as it is a sustainable way to produce media for growing food and decorative plants from waste materials, lowering demand for peat extraction. The local authority should be pro-active and provide composting educational materials and workshops to community groups, schools, residential and industrial estates and businesses to increase basic horticulture skills within the public space, such as group composting schemes where food and gardening waste is collected and can be used locally. The Local Authority could create a Composting Coordinator position who could promote, encourage and facilitate sustainable growing within the County, supporting the roles of the Heritage and Biodiversity Officers.

Invasive Species

Invasive species can out-compete native vegetation and can have a de-stabilising effect on whole ecosystems. Peatlands, by their acidic and low nutrient characteristics, are normally hostile to alien species, but if the peatland has been impacted, for example by drainage, then this allows non-native species to take hold. To date, the main species that have caused problems has been Rhododendron (*Rhododendron pontificam*), Pitcher Plant and Trumpet Plant (*Sarracenia purpurea* and *Sarracenia flava*) and a number of conifer species (Norway Spruce (*Picea abies*), Sitka Spruce (*Picea sitchensis*), Lodgepole Pine (*Pinus contorta*) and Scots Pine (*Pinus sylvestris*). The Local Authority should be pro-active in this regard and raise awareness through education and public-awareness programmes of the effects of invasive species on our natural environment. Attention should be given to preventing spread and means of control. Businesses and planning developments should also ensure to use native hedging, trees, shrubs and flowers to improve biodiversity and lessen the risk of introducing potentially invasive species. IPCC still see the use of laurel hedging in developments, such as housing, which does not provide for native species. Please see Ireland's Peatland Conservation Action Plan 2020 (Malone, O'Connell, 2009) for more information on the issue of invasive species. IPCC would like to see that measures are incorporated into the County Kildare Biodiversity Action Plan for the finding, prevention and eradication of invasive species.

Peat Extraction

The Environmental Protection Agency are currently investigating County Councils as to why many peat extraction sites are operating without an Industrial Extractive Licence or do not have planning permission. It is IPCC's experience that all peat extraction has been conducted without planning permission or a licence (other than Bord na Móna, who have a licence but no planning permission) and essentially un-regulated with no onus on developers to manage their impacts or rehabilitate/restore once industrial production has finished. From looking at some of the EPA's investigations it has become clear that confusion has arisen within the planning departments as to what is domestic turbary and what is industrial production and horticulture products. The Local Authorities and planning departments need to have training in this regard and should reach out to Bord na Móna, the National Parks and Wildlife Service and the Environmental Protection Agency for help in identifying industrial peat extraction. Where peat extraction has been identified the site needs to be visited at the appropriate times to see the machinery active and collect data on the site.

IPCC would also like to highlight that the peat extraction area does not just mean the area where peat is being removed from, but also the area as to where drainage is occurring. A raised bog is like a kitchen sink full of water, and when you pull the plug the water level drops across the whole sink, not just above the plug. This is one of the many implications of drainage that is missed. The whole bog is being drained, releasing peat and ammonia in to the water ways and carbon emissions to air. It is shocking that developers are getting away with draining entire bogs but only extracting from an area below the threshold for planning and licence requirement, only to move to the next area when it is exhausted. This is death by a 1000 cuts and is on purpose.

Peat Piracy

Please ensure that turbary is appropriately monitored throughout the County as to ensure that no loss of important habitat and biodiversity occurs because of unauthorised peat extraction for commercial or domestic turbary. IPCC have heard reports from the turf cutting community in the past, upset, because someone has cut turf in an area that was not worked for years, thinking that

no-one was watching. IPCC have coined this Peat Piracy and make reports in this regard to planning departments so they can investigate them appropriately. The Kildare Biodiversity and Heritage Officers could engage and link in with the planning department, NPWS, EPA and discuss turf cutting issues, such as areas of concern, legalities and regulations surrounding turf cutting, technical guidance, when does it take place, the difference between domestic and industrial peat extraction etc in an effort to start cataloguing problem areas and managing peatland at the landscape scale.

Fire Risk

There is increasing risk and damage from fires on peatlands. As predicted by the Environmental Protection Agency and the National Parks and Wildlife Service climate change is bring drier summers and wetter winters. This is increasingly straining the already dried out raised bogs in the midlands and the upland/lowland blanket bogs. This is due to many damaging actions such as drainage for turbarry, horticulture, agriculture and afforestation. This is only going to get worse as the bogs are dried out further causing loss of biodiversity, erosion, pollution of waterways and increased emissions to air. Peat extraction areas such as domestic turbarry need to have a fire officer in place who can raise awareness of fire issues and highlight problem areas, issues and fixes. A Public Fire Officer could also propose safety measures, alert locals of incoming dry weather, encourage litter pickups (plastic and bottles are fire hazards on dry peatland). It could be a good public engagement opportunity as a public citizen, such as a turf cutter, could be designated the local fire representative and raise awareness from within the community and would liaise with the main Local Authority Fire Officer.

Wetland Surveys Ireland

There are number of sites identified for an ecological wetland survey within County Kildare by Wetland Surveys Ireland. Please ensure they have a survey conducted before any development which could affect them takes place to ensure that no important areas for biodiversity are lost before we know what is there. 90% of wetlands have been lost across Ireland since the 1700s, the highest loss of wetlands in the world (Fluet-Chouinard, Etienne *et al*, 2023) (a 20% decrease since 1990) and this has fuelled the biodiversity and climate change crisis officially announced by Government in 2019. Biodiversity needs to not just be managed at a local scale but also at a landscape scale. We must fully map the wetlands and understand the repository of biodiversity and the variance in the habitats to ascertain priorities for conservation and nature based solutions to wetland management.

RAMSAR

The RAMSAR Convention is an international treaty for the conservation and sustainable use of wetlands which Ireland ratified in 1985, before the integration of the EU Habitats and Species Directives. County Kildare is home to two internationally recognised wetlands designated (under RAMSAR) for their international importance, exhibiting wetland features at the most extreme of their range - at the edge of western Europe. Pollardstown Fen and Raheenmore Bog are RAMSAR sites while also designated under the EU Habitats and Species Directives. These sites should be publicised more as RAMSAR sites and this would also help the Irish RAMSAR Committee in its quest to raise awareness of the importance of managing wetlands for biodiversity and conservation and using wetlands for nature based solutions (flood regulation/freshwater filtration/urban wastewater management, biodiversity refugia) as Ireland is legally bound to do so under the RAMSAR Convention. Interpretation at these sites should be integrated into a wider story and network of the County's designated sites with web-based, novel media strategies linking the biodiversity hotspots and amenity for visitors. RAMSAR is also a great opportunity for international co-operation and networking. The Local Authority is missing out on a great international liaising network by not organising international RAMSAR events.

Pets

The Biodiversity Action Plan needs to highlight and design methods to increase awareness and manage pets on high nature value areas. There are significant impacts, such as disturbance and fatalities of important breeding ground nesting birds from dogs and cats This could be reduced with the introduction of biodiversity wardens to monitor high nature value areas.

BAP/CAP/WAP

Please ensure that the Biodiversity Action Plan shares wording and linked actions with the Climate Action Plan and the Water Action Plan. All three areas are intrinsically linked and will have more synergy if coordinated. The linkages could be highlighted within the plans showing coordination and same page thinking.

Renewable Energy

While IPCC are not inherently opposed to the construction of wind and solar farms as we understand that Ireland has legal obligations to provide 80% (Climate Action Plan 2021) of its energy production from renewable sources by 2030, however, installing developments in peatland goes against the biodiversity and climate change emergency announced by the Irish Government in 2019 and against the EU Habitats and Species Directives. Peatland is already a climate hero by providing space for native, rare species, filtering freshwater, sequestering and protecting carbon stores and regulating climate. Installing energy developments on peatland is misrepresenting the climate change agenda for big business. Peatland landscapes in Ireland are meant to be open landscapes and the species that utilise them have evolved to live in the hostile, acidic, water saturated low nutrient conditions. Species can be disturbed during construction and never return again, as is the case with Curlew and other ground nesting birds. Renewable energy companies are taking advantage of the many cutaways left from state-sanctioned peat extraction which should be fully restored without the impacts of development.

Peatlands Park

The IPCC are based in the Bog of Allen Nature Centre on the island of Lullymore where schools, community groups, tourists, universities and colleges come to learn about peatlands in the Peatland Exhibition and can visit the Nature Reserves to conduct conservation and management actions to gain experience in peatland restoration. IPCC manage two nature reserves in County Kildare,

Lodge Bog and Lullymore West. Lodge Bog, a raised bog which was spared from full development, and is managed for conservation including the monitoring of some of the last Curlew in County Kildare and the Large Heath butterfly, a raised bog specialist. Lullymore West, a cutover regenerating as wet heath is managed for the Marsh Fritillary butterfly, a species in decline across Europe and ANNEXED under the EU Habitats and Species Directives. Lullymore West also receives monitoring under the Bumblebee Monitoring Project, National Pollinator Survey and the National Biodiversity Data Centre's Butterfly Monitoring Scheme. The data IPCC collects feeds into national efforts in learning trends of many important species. Butterfly Conservation Ireland also manage a nature reserve in Lullybeg for Marsh Fritillary and liaise with IPCC in conservation. The Lullymore Heritage and Discovery Centre also located on Lullymore Island manage peatland for biodiversity and tourism and celebrates the local history bringing many visitors, national and international to the unique island where they can learn about the local history, heritage and culture. The LH&DC are also taking part in an emission monitoring project, feeding into the national knowledge on climate change and the positive effects of rehabilitation.

The area is a hot-bed of conservation, restoration and rehabilitation projects due to the complex of peatland originally being the largest piece of raised bog within the Bog of Allen, spanning approximately 7000ha. This is an accolade unique to Europe. In fact, the Ballydermot peatland area is already recognised internationally as being one of three important Butterfly Areas in Ireland (IBAs) by the Dutch Ministry for Agriculture (Nash, D. (2003))

In 2019 Bord na Móna declared that they are ending peat extraction due to the increasing regulation and the European Union's move to renewable energy. Now that the company has finally ended peat extraction (which IPCC has campaigned for since its establishment), much of the peatland industrial landscape of County Kildare is going to receive rehabilitation as per the Peat Extraction Licence issued to Bord na Móna. This brings with it an opportunity to not only change the industrial tone of the County but also can be a major step to taking action in reversing the declines in biodiversity, mitigating climate change and providing a true wilderness for wildlife and amenity.

It was in this regard that the IPCC joined the National Peatlands Park Group, a consortium of wildlife organisations that have conservation interests and understand the opportunity that this complex of peatlands provide. The National Peatlands Park Working Group, consisting of the Lullymore Heritage and Discovery Park, Umeras Peatlands Park, Kildare Bat Group, Wild Kildare, Butterfly Conservation Ireland and the Irish Peatland Conservation Council - all support the creation of a Peatlands Park, where the peatland landscape in the County is recognised officially as a biodiversity recovery landscape. This would garner a new relationship with our peatland heritage, bring National and International recognition, create a network of interconnected areas of high nature value, provide opportunities to develop the existing tourism structure sustainably and create new sustainable peatland related experiences. It would be also help to empower local communities to engage in their environmental heritage. Through promoting the Peatland Park vision it has gained so much enthusiasm that it has been accepted as an action within the County Kildare Development Plan and the IPCC implore the County Council to work with all the stakeholders to make this a reality. IPCC are fully aware that Bord na Móna are progressing a renewable energy project for the Ballydermot Bog Complex and understand that they are a company and feel the need to find more profitable uses for the landbank that they manage, but this does not appreciate the declines in biodiversity that Ireland has faced. Installing renewable energy projects in peatland, as IPCC has expressed before, will alter the restoration potential with the enormous geo-engineering accompanied with the development including the concrete hardstands, cabling and connecting infrastructure. With the Ballydermot Wind farm proposal Bord na Móna expects 69km of roads to accompany the huge turbines. Ireland is shooting itself in its foot by installing developments in the cutaways and cutovers before they receive rehabilitation and restoration under the monicker of green energy, while further disrupting the hydrological and ecological parameters. While the area may become a carbon sequestering habitat in time with basic rehabilitation, its ability to provide totally for biodiversity while also being a renewable energy project is completely questionable. Even though Ireland has designated 53 Raised Bog Special Areas of Conservation, designated because they contain intact, or near intact ANNEXED habitat (capable of natural regeneration within 30 years), these are smaller individual sites (although representative), whereas the Ballydermot Bog Complex, while currently industrially impacted, is a huge area and with rehabilitation and restoration in time would also also be worthy of European designation, would suffer from less edge effect and would provide real wilderness for biodiversity recovery.

Conclusion

The IPCC appreciate the development of a Biodiversity Action Plan for County Kildare and see it as a step forward in our collective efforts to reverse the biodiversity decline attributed with the loss of peatland habitats. Focus on preservation and protection of biodiversity can only enhance our lives, as highlighted by the EU Parliament where research has show that for every €1 spent on nature recovery, we save €4-38 in other areas of our lives (Directorate-General for Environment, EU Parliament). This is a clear indication that investing in nature is not just a moral and ecological imperative, but also a sound economic strategy. The Biodiversity Action Plan for County Kildare, therefore, represents a significant investment in our future, with potential benefits far outweighing the costs. However, the success of this plan will depend on the active participation and collaboration of all stakeholders, including local communities, conservation organisations, government agencies, and businesses. The most important aspect of County Kildare Biodiversity Action Plan is to recognise the opportunity in maximising the biodiversity recovery by giving peatland the chance to provide a true wild arcadia, which is not possible on this scale anywhere else in Ireland.

Thank you for reading through our comments and we hope that you take our concerns on-board

Yours Sincerely,



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