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Re: Turf Cutting

Dear Deputy;

At the outset, may we congratulate you on your recent success in election to the Dail. We are sure that we do not have to tell you the honour and responsibility that now falls upon your shoulders.

We are, however, deeply concerned with your support for those who are choosing not to respect European legislation by engaging in mechanical turf cutting in protected areas and recent media supports suggesting that the 'ban' on turf cutting is to be reversed .

We have been supporting measures to ensure compensation and alternative fuels since Sive DeValera gave a 10 year derogation 12 years ago:

*The Ministers are conscious of the social and economic impacts immediate cessation would have on small communities and have decided to make exceptional arrangements in the case of cutters for domestic use. Cutters will accordingly be given a period of up to 10 years to make new arrangements.*

While we have consistently made it clear that we do not support a relocation of turf cutters to nearby non-designated sites as any such solution would fail to address the significant environmental and other problems resulting from peat extraction, we very much support suggestions made to the Working Group that recommended support grants to convert turf users home energy systems to sustainable and renewable energy systems (particular those based on locally grown wood/biomass) and linked in with current grants for energy-saving schemes, such as domestic insulation.

We also strongly support the recommendation of funding alternative energy sources for householders, including the facilitation and financing of medium-term rotation coppicing systems and sustainable woodland - based mainly on native broadleaved species - for energy biomass, either as individually or co-operatively owned woodlands.

While we fully understand the cultural and political reasons for your position, we feel that if you thought through the damage to the environment that you and others in the Turf Cutters and Contractors Association have done you would in the interest of the nation reconsider your position and support alternative solutions.

The loss of raised bogs to turf cutting has recently been found to be 99% of the original area of actively growing raised bog, with one-third of the remaining 1% lost in the last 10 years.

Further scientific validated evidence is provided in:

- The 2006 Report, "Assessment of impacts of turf cutting on designated raised bogs", where Valverde and his co-authors record that: 'All domestic [turf] cutting is for fuel peat. This activity has been going on for centuries and is the main cause for the reduction in the original raised bog area [in Ireland] from 311,000ha to current area of around 18,000ha [a reduction of over 94%]. Most of this cutting was carried out by hand but now most cutting is mechanised and appears like a scaled down version of the commercial type.'
- Ireland's 2007 Article 17 report to the European Commission required under the Habitats Directive recorded a further decrease of 36% in active raised bog extent from 1994-2005.
- Finally, on 14 May 2010, Ireland's 4th National Report to the Convention on Biological Diversity put it this way: 'Raised bogs are most abundant in the lowlands of central and midwest Ireland. The habitat has been heavily exploited. It is estimated that there has been a 99% loss of the original area of actively growing raised bog, and one-third of the remaining 1% has been lost in the last 10 years.'

Your public statement that the Government had no baselines by which to measure the damage is clearly without any foundation - such records exist both through studies and through ordinance survey maps, which show that the tiny teeth-like intrusions of earlier this century have been obliterated as entire raised bogs have been consumed.

The TCCA claimed in their July 2009 submission to the Government-established 'Working Group on the Cessation of turf cutting' that their members are responsible for cutting only a small proportion of 'what they own'.

In fact, domestic turf cutting takes place at 117 of the 139 raised bogs designated for nature conservation, including state-owned designated bogs. At Clara Bog 71 such sites were found to be being actively cut on the part of bog in state ownership, in spite of warning notices having been erected.

Often the case is not the extent of the cutting, but the location, which can drain the core 'ecotope' area of raised bogs and can result in collapses and the formation of lakes where pristine bog once flourished.

Cutting within 250 metres has been well established as damaging to the habitat, but even this does not take into account situations where layers under the bog may be affected which can lead to much more extensive drying out. This was the case at Clara Bog where the subsidence due to turf cutting was measured over 600m away from the face-bank.

Your public claim that in spite of cutting at the TCCA Chairman's Lissnageerah Bog, the bog had increased by 45.03% was particularly specious when added to your complaint that the state 'has many years to carry out remedial works' and had not done so. It is because of remedial works at this bog that the area has increased.

Lisnageeragh was one of the bogs where a series of management measures were developed and then implemented under a recent EU funded LIFE project. In spite

of this, cutting has continued, reports noting that while 'Although peat cutting intensity has decreased in the last ten years it continues negatively affecting some sections of Active Raised Bog habitat. High bog drainage associated with peat cutting is also negatively influencing Active Raised Bog habitat.'

You have stated that 'if it was the case that cutting turf was going to irreparably damage the bogs, I would stop it - but the NPWS figures tell me that my bog has grown'.

'My bog' - Cloonchambers - has grown by 10.63% because of the very restoration work which you claim has not been undertaken by the Government - in this case the European Union Cohesion funded Raised Bog Restoration Project, which ran from 1994-99.

Media photographs show that cutting continued on this bog during the past year.

Further, 'extent' is not the only measurement of the conservation status of the bogs. In spite of the Raised Bog Restoration Project, the Cloonchambers Active Raised Bog 'habitat quality' has 'slightly declined as the loss of central ecotope indicates' – in spite of any change in its 'extent'.

This is because: 'The loss in central ecotope is related to the occurrence of peat cutting, which although it only occurs in a few locations on the site has taken place close to the central ecotope. Furthermore, a large high bog drain has been deepened close to this area and thus it is likely to have some sort of negative impact on the habitat.'

Countless scientific reports demonstrate that the extraction of peat is doing irreparably damage to Ireland's bogs. To suggest anything else relies on the very 'distortion' of the facts you deny you are practicing. Because of the detailed figures you quoted on Prime Time - down to the second decimal point - there is no doubt that you are familiar with the reports from which both your distortions and this letter to you are drawn.

You must be aware that what you and your fellow peat cutters are doing is 'irreparably damaging' the last 2/3rds of the remaining 1% of Ireland's unique bogs. You must be aware of the European legislation which was intended to protect this very small remainder of this rare and valuable asset.

You may not be aware, however, of the recent Letter of Formal Notice to Ireland that addresses the incompatibility of the so-called peat extraction "derogations" with the requirements of Article 6 of Directive 92/43/EEC and the requirements of Directive 85/337/EEC. Indeed, very few people are aware of considerations by the Commission of an application to the European Court of Justice for Interim Measures to prevent further turf cutting, similar to the action the Commission took in 2008 to prevent the further shooting of wild birds in Malta [Case C-76/08R].

To continue to encourage people to flaunt this legislation, in spite of all the scientific evidence of the damage this is causing, will do nothing but encourage contempt for all laws and make the possibility of daily fines which we can ill afford more likely. The 10 year derogation which Ireland gave itself to address this issue is now well past and new leadership is required.

We earnestly urge you, now that you have become elected to the Oireachtas, to lead the way in bringing an end to this era of environmentally damaging activities, however noble and historic, and place yourself in the forefront of those seeking viable and sustainable alternatives for those adversely affected by our new knowledge of these important eco-systems.

We would be most pleased to meet with you at your convenience or to talk through with you on the telephone the issues involved.

Respectfully yours,

Tony Lowes