

**EEB AGM, Brussels, 19-20 October 2013
Resolution on raised and blanket bogs – as adopted**

The General Assembly of the European Environmental Bureau calls on the Irish Government and the European Commission to take urgent measures to protect the remaining peat bogs in Ireland and other parts of Europe.

Under the Habitats Directive, Member States are required to designate areas to conserve and protect certain endangered and important habitats and their species. These areas are referred to as the Natura 2000 network, and from a global perspective, these habitats are Europe's equivalent of the rain forests whose loss and destruction is generally criticized and acknowledged as an issue.

The EEB calls on all Member States and the European Commission to actively support and enforce the protections intended by the Habitats Directive to protect these European habitats and species.

Bog habitats are among the habitats subject to these protections, and some bog habitats are accorded priority habitat status in recognition of the extent of historical destruction of bogs across Europe, with some Member States having effectively totally destroyed their active bogs. Despite these protections, what is happening on the ground in Ireland falls far short of European legislative requirements, and in fact breaches a number of European Directives according to judgements from the Court of Justice of the European Union¹.

According to Ireland's official report to the Convention on Biological Diversity (2010), "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. Although the best examples of raised bogs are now designated as Natura 2000 sites, deterioration of the hydrological conditions caused by peat cutting, drainage, afforestation and burning severely threatens the viability of the habitat at most locations."

Additionally, as a result of these activities, Ireland's peatlands (both raised bogs and blanket bogs) which when intact acted as a carbon sink, now instead emit 9.64 megatonnes CO₂/yr, which is more than the total of all residential emissions in Ireland. The burning of peat which is a fossil fuel in Ireland is subsidised significantly² and emits 3 megatonnes CO₂/yr. The drainage and extraction conducted unlawfully in the absence of Environmental Impact Assessment in Ireland also significantly impact on water courses compromising water quality and aquatic species³.

Peat extraction continued in 2013 on a large number of raised bog Special Areas of Conservation, demonstrating that an effective enforcement strategy is not in place for Natura 2000 sites.

Therefore the EEB General Assembly calls on the Irish Government:

- To take the necessary steps to end peat extraction on all sites where the requirements of the EIA Directive have not been met and on all Natura 2000 sites except for exceptional circumstances⁴, and to ensure the resourcing and operation of the necessary enforcement mechanisms in spatial planning and environmental licensing, and that the provisions of the Water Framework Directive, Birds and Habitats Directives, and Environmental Impact Assessment Directive are fully applied to peat sites⁵;
- To confirm that the protection afforded to raised bog Natural Heritage Areas will not be reduced as has recently been floated in the Irish media;

- To commence a comprehensive and large-scale programme of restoration of peatlands and to convert the state-owned peat extraction company Bord na Móna into an agency of peatland restoration and management⁶;
- To end the burning of peat in electricity generation, the fossil fuel with the highest greenhouse gas emission rate, by ending the Public Service Obligation cross-subsidy;

And additionally calls on the EU Commission:

- To extend support for peatland restoration in Ireland and other Member States through LIFE+ and other appropriate mechanisms;
- To take all necessary steps and measures to ensure that all Member States comply fully with the Habitats Directive in respect of conservation obligations and any activities which impact on Natura 2000 sites; with the EIA Directive in relation to the requirement to subject activities damaging peatlands to a requirement for development consent involving an EIA; and with the Water Framework Directive in relation to the requirement to regulate the impacts of activities causing emissions from peatlands into rivers and lakes;
- To confirm that climate change considerations are now fully integrated into EU policy on energy markets, state aids etc. and that it will not approve any form of support or subsidy for peat-fired electricity generation.

Notes to the motion:

1. *c-392/96, withdrawn c-294/03, c-215/06, c-50/09 with additional complaints to the EU Commission in process.*
2. *The use of peat for electricity generation is uneconomic and therefore Ireland sought, and the European Commission approved, in 2002 a cross-subsidy, by way of a Public Service Obligation levy on every electricity consumer, to support the peat-fired power plants. (In doing so the Commission took the view, as expressed in a letter from then Commissioner Loyola de Palacio to then MEP Patricia McKenna, that Ireland's compliance with the Kyoto Protocol was a matter for Ireland and not the Commission).*

The use of peat for electricity generation increased by 16% between 2011 and 2012. Bord na Móna has reported that this year, 2013, it extracted more peat than ever before.

Three megatonnes of CO₂/yr are emitted from the burning of peat in three peat-fired electricity generating plants as a direct use as fuel, and further un-estimated emissions result from the use of peat in horticulture.
3. *No peat extraction activity operating in Ireland has ever been subjected to an Environmental Impact Assessment (EIA) process.*
4. *Exceptional circumstances being where small-scale hand cutting is part of an appropriate response to dealing with the legacy of previous extraction.*
5. *Peatland degradation whether for extraction or forestry has significant impacts on many Irish water catchments, including impacts on aquatic Natura 2000 sites. Although the Water Framework Directive required that all licences involving emissions to water be reviewed where the emissions have an impact on the ability to reach the objectives in the River Basin Management Plans, the IPPC licences for peat extraction were not reviewed but were only subject to technical amendment, despite NGOs pointing out the requirements in advance of the process.*
6. *The feasibility of peatland restoration has been demonstrated in a number of countries including in Ireland, where a project aimed only at rehabilitation, not even full restoration, has nonetheless ended large-scale greenhouse gas emissions from an area of cutover peatland and turned the area in question into a net greenhouse gas sink.*