



INTERNATIONAL MIRE
CONSERVATION GROUP

dr. Hans Joosten
Botanical Institute
Grimmerstr. 88
D-17487 Greifswald
Germany
email: joosten@uni-greifswald.de

tel: +49 3834 864128

fax: +49 3834 86 80 007

email: joosten@uni-greifswald.de

Re: Draft Proposal establishing the ecological criteria for the award of the Community eco-label to soil improvers and growing media

Greifswald, 28-02-2001

No to incorporation of peat in eco-labelled Soil Improvers and Growing Media

The eco-labelling of Soil Improvers (SI) and Growing Media (GM) has the laudable aims to minimise waste by promoting use and re-use of organic waste material, while reducing environmental damage or risks.

The **International Mire Conservation Group** (IMCG) applauds the initiatives of the European Commission to stimulate a more sustainable and environment-friendly use of soil improvers and growing media.

In the European Commission Decision draft "Establishing the Ecological Criteria for the Award of the Community Ecolabel to Soil Improvers and Growing Media" it is proposed to award an ecolabel to soil improvers and growing media that contain a minimum amount of 30 % vol. of composts.

To stimulate the use of composts, it is proposed to grant Growing Media an ecolabel even when non-renewable (fossil) peat (up to 70% vol.) is added. The peat should have been extracted under conditions that "guarantee of environment safeguard and maintenance of the natural properties of the wetland ecosystem" and "shall come from peat lands where protocols of good environmental management and final restoration practices are applied (i.e. the fulfilment of national and/or international conservation standards)".

The IMCG would like to bring the following issues under your attention:

1. The effect of including peat in eco-labelled growing media is doubtful and might even be negative.

- Currently only 1-2 % of the growing media consist of composted biogenic waste and bark. The Technical Report states, that "from a technical point of view" growing media can consist of up to 50% of composts.
- If this statement is true, the current share of composts in growing media is only determined by the price ratio between composts and peat. An increased use of composts should then be brought about by raising the relative price of peat. This means that an ecotax on peat will be far more effective to reach the Commission's goal than an ecolabel on peat containing media. An ecotax will stimulate a 50 % replacement of peat by composts in the total Growing Media market. An ecolabel will lead to a replacement of only 30% (the required minimum) in the – much smaller - eco-labelled market.

- If the Technical Report's statement is *not* true, an ecolabel will hardly influence the volume of composts used in professional horticulture. The modern horticultural industry demands growing media of high and constant quality and can not take the risk of using suboptimal materials as long as better alternatives are cheaply available.
- It is probable that eco-labelled growing media with up to 70% of peat will penetrate markets that currently use a much larger share of composts. This is exactly the process that has been taking place in North-America in the last decade, where Canadian peat – also with “environmental “ pretences - has taken over large parts of the USA home gardeners market at the expense of composts. This may imply that rare high quality peats will increasingly be squandered where they could easily be substituted by composts.

2. The condition that the peat used in GM "shall come from peat lands where protocols of good environmental management and final restoration practices are applied (i.e. the fulfilment of national and/or international conservation standards)" can not be met.

- Currently no generally agreed protocols of environmental management of peatlands and no generally accepted criteria for a successful restoration exist.
- Recognizing that peatlands are severely underrepresented in the global wetland conservation system, the Ramsar Convention has launched an ambitious Global Action Plan for Peatlands (GAPP) at its 1999 Ramsar COP7 in Costa Rica. This GAPP (see <http://www.imcg.net/docum/gapp.htm>) identifies various themes related to the development of such protocols. The GAPP is envisaged to appear as a Resolution at COP8 in Spain in 2002 for its acceptance and further implementation.
- The discussion on the development of Guidelines for the identification of peatlands of international importance has only just been started within the Ramsar Scientific, Technical and Review Panel.
- Good progress has been made with the development of Wise Use Guidelines for Global Mires and Peatlands by the International Peat Society and the International Mire Conservation Group. These Guidelines, however, do not formulate concrete and detailed criteria for “good environmental management.” These have to be worked out in a later stage through an approach that integrates international criteria (including Ramsar criteria) with national conditions.
- No national or international standards for restoration practises exist nor are currently under development.
- The developments mentioned have to be coordinated, tuned and harmonised to avoid internationally uneven provisions.
- All this implies, that no internationally accepted and easily applicable protocols and standards can be expected to become available during the period in which the product group definition and the specific ecological criteria for the product will be valid.

3. The eco-labelling of non-sustainably extracted peat is in conflict with many international Conventions, Directives and recommendations.

- As peat accumulation and storage are the main natural properties of peatland ecosystems, peat extraction *per definitionem* conflicts with the “maintenance of the natural properties of the wetland ecosystem” (*cf.* Ramsar Convention).
- Peatlands in the world contain as much carbon as contained in the atmosphere and they accumulate annually approx. 1 % of the carbon emissions of fossil fuels.

Peat extraction and associated drainage change peatlands from carbon sinks into carbon sources (*cf.* UNFCCC).

- The peat currently used in soil improvers and growing media is at least thousand years old and mostly much older. The time needed for a renewal exceeds any reasonable economic and cultural time frame (*cf.* Rio-Declaration)
- In practise, such a renewal, however, does not take place. Although peat has been extracted extensively within Europe for almost 1000 years, virtually no peat has accumulated on the cut-over areas since. Unless the peat accumulating capacity of cut-over peatlands is restored, the resources will eventually be depleted.
- Restoration can only apply to part of the peatland functions. The functions related to carbon storage, archive value, shape, sophisticated self-regulation, and surface patterning are irreversibly destroyed or need thousands of years to develop.
- Current restoration activities have to be applauded, but are still extremely restricted - largely to nature conservation sites. For technical and planological reasons, restoration cannot be expected to contribute to a sustainable peat use in the next 50-100 years.
- Claims of current sustainability cannot, therefore, withstand critical evaluation. Peat losses from human exploitation are currently 2 – 3 times larger than global peat accumulation. Both peat volume and mire/peatland extent are continuously decreasing globally. The annual consumption and losses of peat in the EU are larger than its annual accumulation in entire Europe. Most countries from which peat is imported into the EU have a negative peat budget, including all Baltic states.
- The peat type preferably used for growing media (slightly humified Sphagnum peat) is restricted to raised bogs, that occur in specific climatic and biogeographic regions. Within the EU, this peatland type has become near to extinct in the last century and is consequently a priority habitat in the EU Habitats Directive (92/43/EEG). Outside the EU the type is under threat, as the peat industry roams – as the last hunter-gatherers – from one exhausted peatland to the next. Losses of peatland types in whole biogeographic regions can not be compensated for by peat accumulation in other areas or by protection of other peatland types.

4. The eco-labelling of growing media that contain fossil peat hinders the development of new environment-friendly technologies.

- Slightly humified Sphagnum peat is a valuable resource for professional horticulture. In West- and Central Europe formerly extensive stocks are almost exhausted and peat is increasingly imported from the Baltic countries, Finland and Canada.
- The rate at which resources have been disappearing makes it clear, that - if these trends continue - slightly humified Sphagnum moss peat and virgin bogs will in the long run survive only in nature reserves and areas which are technically and commercially inaccessible. Bog reserves will continuously be under threat to follow the example of the Esterweger Dose, the last large living bog in Germany: a nature reserve since 1937, sacrificed for peat extraction at the end of the 1950's...
- Fossil peat as an exhaustible natural resource should therefore be timely replaced by renewable alternatives.

- Development of such alternatives will be severely hampered by awarding an eco-label to a product that contains up to 70% of fossil peat:
 - The pressure on developing growing media largely from composts and similar re-used organic wastes will decrease as the failing properties of current composts can easily be compensated for by adding considerable amounts of fossil peat.
 - The pressure for developing *paludiculture*, the rotational “farming” of peat, for which the first pilot studies are currently being undertaken, will decrease as fossil peat will– when mixed with only 30% of compost – already have the “air” of environment-friendliness, sustainability, biodiversity protectiveness and all other “eco”-attributes and therefore have the same market-advantages as products that rightfully deserve eco-labelling.

As ecolabelling of Soil Improvers and Growing Media containing peat will significantly miscredit ecolabelling, we ask you to refrain from awarding an ecolabel to products that contain peat.

We wish you success with your important task to guide the European Union towards a sustainable future.

Sincerely yours,

On behalf of the International Mire Conservation Group

dr. Hans Joosten
Secretary-General

The International Mire Conservation Group (www.imcg.net) is a network of specialists in over 60 countries that promotes, encourages and, where appropriate, coordinates the conservation of mires and peatlands; and enhances the exchange of information and experience relating to these ecosystems and factors affecting them.