PART 8: ALTERNATIVE SOURCES

1. Whisky production on Islay has fluctuated considerably over the years and recently there have been cut-backs reflecting a worldwide reduction in demand. There is no evidence that the type of peat, in the sense of its precise site of origin on Islay, affects the quality of the Islay Malt Whisky produced (McFarlane, 1968). Thus the NCC attempted on several occasions to persuade the local planning authority to consider alternative sites before determining the application. Furthermore between the Secretary of State's announcement in July 1984 that planning permission should be granted and his confirmation of the conditions to be attached to the planning permission in December 1984, the NCC attempted similarly to persuade Scottish Malt Distillers. The NCC had, with the co-operation of the suppliers, investigated in some detail the suitability for distillery purposes, drainage and commercial machine cutting of alternative peat sources.

2. Once the Secretary of State had granted planning permission NCC had no power to constrain the development from proceeding. However attempts to persuade SMD to consider alternatives continued.

3. An obvious alternative that NCC has attempted to pursue with SMD was an arrangement offered by the peat suppliers McIntyre and Brown Ltd. whereby they would enter a management agreement with NCC through which peat supplies from the already exploited north east section of the site (over which McIntyre and Brown have a lease on the peat extraction rights) would be made available as an alternative to Duich Moss. SMD have been using peat from this moss for the last five years without, apparently, any detrimental effect on their product.

4. At present a significant proportion of McIntyre and Brown's output of peat goes to the domestic fuel market but they are prepared to divert the entire production to SMD. M & B's lease with the owners, The Laggan Estate Trustees, covers 55 acres (22ha) with at least 100,000 cubic metres of extractable peat remaining. At their current level of demand, this would ensure SMD's supplies for 50 years (see letter at Annex 1). M & B have the option of extending their lease to cover a further 12 acres (5ha) which would yield another 88,000 cubic metres. NCC have stated that they would not object to this extension which relates to an area which is hydrologically distinct from the care of the site.

5. These are conservative estimates, but it is clear that at current demand levels, this source of supply could last some 100 years. However, SMD's projected demand is 10,000 cubic yards a year and if this is a realistic estimate this alternative source would only last 20 years. On the other hand, it is calculated by the contractors that Phase 1 of the proposed Duich Moss development could only produce a maximum of 2,500 cubic yards per year for 12 years (the time restriction in the planning permission) which appears to be incompatible with SMD's stated requirements.

6. Another possible alternative source of peat for SMD (which could be pursued consecutively should the M & B supply indeed only last 20 years) is located at Castlehill, an area of some 408 ha, situated closer to the maltings than either Duich Moss or the McIntyre & Brown site and hence perhaps more conveniently placed for exploitation. This site is owned by the Forestry Commission, a government agency. As with the M & B site, the peat is presumably of an appropriate quality to meet SMD's requirements since they formerly owned the peat extraction rights for it. When the owners of the land, Laggan Estate, sold the freehold to the Forestry Commission, SMD exchanged the peat rights for those at Duich Moss. It may be possible for NCC (or SMD direct) to negotiate an agreement whereby the Forestry Commission would release an area of Castle Hill equivalent in size to Duich Moss for peat cutting.

7. If, for example, an area of 60 ha were released, this would provide approximately 600,000 cubic metres of peat from the first cut and rather less from a second cut, perhaps 400,000 cubic metres. Even at SMD's projected demand of 10,000 cubic metres per year this would last for 100 years, and at the current demand for 500 years!

8. As the Castle Hill option would take two or three years preparation before production could commence, an appropriate solution would be to use the McIntyre and Brown area in the short and medium term and to secure the Castle Hill area as a long term supply.

Reference

MCFARLANE, C. (1968). The estimation and identification of phenols in malt from peat-filled kilns and some applications of the analysis. J. Brewing Sci. 74 272-275.

PART 8 ANNEX 1

WITHOUT PREJUDICE

McIntyre & Brown,
'Modhachaidh',
School Street,
Bowmore,
Isle of Islay.

19th December 1985.

Dr. E. Bignal,
Quinhill,
Clachan,
Tarbert,
Argyll.

Dear Sir,

Further to our meeting yesterday I thought it might be helpful if I confirmed in writing some of the points that we discussed in relation to the possible use of my moss as an interim alternative to the opening of Duich Moss by S.M.D.

(1) I have been supplying S.M.D. with peat from my moss for the last five years and the quality has been entirely satisfactory,

(2) At present a significant amount of my output of peat goes to the domestic fuel market. If my entire output were to be devoted to S.M.D. there would be at least 100,000 cubic yards available for their use, which at their present demand would represent about 50 years of peat. At 10,000 cubic yards per year, which you informed me is S.M.D.'s projected demand, this would last 10 years.

(3) The N.C.C. has indicated that they would not object to the proposed 12 acre extension to my existing moss and this could also be available, thereby providing a further 8 or 9 years supply of peat for S.M.D. use. (88,000 cu. yds.).

(4) As I indicated in previous correspondence with Mr. Wilkinson I am willing to enter into a management agreement with the N.C.C. (subject to suitable financial consideration) to devote the entire output of my moss for S.M.D.'s use.

(5) We discussed the longer term alternatives and the Castlehill area, owned by the Forestry Commission, could provide a suitable moss for machine cutting peat.

Yours faithfully,

I. Brown
for McIntyre & Brown.

PART 9: NCC'S INITIAL SUBMISSION TO THE SECRETARY OF STATE FOR SCOTLAND IN RESPONSE TO SCOTTISH MALT DISTILLERS' PLANNING PERMISSION

1. This is attached as Part 9 Annex 1.

SUBMISSION TO: The Secretary of State for Scotland

From: The Nature Conservancy Council

Re: Town and Country Planning (Scotland) Act 1972
Proposed Peat Workings at Duich Peat Moss

CONTENTS

Appendices

1. NATURE CONSERVATION INTEREST

A detailed description of the nature conservation interest of the site is given in Annex 1. In brief, Eilean na Muice Duibhe SSSI is a nationally important peatland in its own right and forms an integral part of the national series of British peatlands. The hydrological/ morphological features of the site are physically intact and it displays excellent examples of pool systems, flat plateau peat flows and natural marginal seepages into poor fen (see annotated aerial photograph at Annex 2).

The intact nature of the surface is reflected in the well developed areas of actively growing Sphagnum moss as well as healthy populations of the rare mosses Sphagnum imbricatum and S. fuscum. The site has invertebrate and ornithological interest and is the single most important British site for Greenland Whitefronted geese. In this connection the Site is of international importance and is under consideration for designation as a Special Protection Area under the EEC Directive 79/409/EEC.

2. IMPLICATIONS OF THE PROPOSED DEVELOPMENT

Scottish Malt Distillers have explained that of the area for which planning consent is sought, only the eastern two-thirds has a sufficient depth of peat to be utilisable for machine cutting of peat blocks suitable for kiln firing purposes. This part of the site is the least disturbed and hence is most important in nature conservation terms. It is clear to us that construction of the necessary access road, drainage prior to machine cutting and physical removal will result in serious damage to the central core of the site. We also anticipate that additional drainage adjacent to but outwith the application area may be necessary before machine extraction could commence, thus extending the effects on the hydrology and hence the nature conservation value. The interest of the vegetation communities on this part of the site is a reflection of the high water table and lack of burning and other disturbance of the peat surface. It is against this background that NCC has registered an objection to the granting of planning consent for peat extraction by Scottish Malt Distillers,since we are of the opinion that such extraction would directly and indirectly result in serious and irreversible damage to the nature conservation interest of the site. Justification for this view is supported by inspection of the nearby area now being worked by Messrs McIntyre and Brown.

3. PEAT QUALITY

The SMD claim that the quality of the peat from this site is specially suited for distilling, particularly in relation to phenol levels in the peat smoke. However, research on this subject concluded that the pronounced character of Islay whiskies is due wholly or partly to the prolonged kilning and large quantity of peat burnt in producing the malt. Gas

chromatographic studies indicate that the marked 'peaty' character of Islay whiskies is not due to different compounds in the peat but to a higher level of smoke compounds present in the Islay malts. NCC does not accept the argument that there is a significant difference in the quality of peat for distilling purposes between Eilean na Muice Duibhe and other blanket peat Sites on Islay.

4. OTHER SOURCES OF PEAT

We attach for information Map 1 which shows the distribution of deep peat on Islay and at Annex 4 Map 2 showing the wider expanse of shallow peats where pockets of deep peat occur. The NCC consider that a detailed assessment of this resource is necessary to put this application into perspective and to adequately weigh the need for peat cutting here against the nature conservation interest. We consider that a survey of this kind should be co-ordinated either by SDD or the District Council but that it would be inappropriate for NCC to carry this out in isolation. We have no evidence that serious consideration has been given to the question of alternatives. In further support of our contention, we attach at Annex 5 comments on a few areas worthy of detailed examination.

5. SUMMARY OF GROUNDS FOR REFUSAL

1. The Proposal is contrary to the spirit and intent of Policy ENV1(B) (Addition) of the Strathclyde Region Structure Plan

1.1. In the "Review of Rural Matters and Environmental Policies" presented to the Secretary of State (December 1981) by Strathclyde Region, para 3.9 states "The National Nature Reserve and Sites of Special Scientific Interest (SSSI) do not include all localities of significance to nature conservation in the Region". It goes on to say that Scottish Wildlife Trust Reserves, RSPB Reserves and statutory Bird Sanctuaries deserve comparable protection to NNRs and SSSI.

1.2. Our view is that there can be no question about the regional significance of Eilean na Muice Duibhe, given that it has been annexed to the Nature Conservation Review list of nationally important Sites and is now formally notified as a Site of Special Scientific Interest. It seems illogical to us that it should be treated any differently from non-statutory reserves for which the Regional Council have successfully argued a strong case - ENV 1(B).

1.3. Given the detailed treatment of ecologically important habitats (Schedule 8) within the Structure Plan and the importance of this site for nature conservation, it would be inconsistent not to presume against development. The Site represents a scarce resource which we would expect the Regional Council to protect with all available powers.

2. The District Council have failed to investigate adequately the availability of other sources.

2.1. The letter from Mr Stuart of SDD to Argyll and Bute District Council dated 14.7.83 recommended that the District Council and NCC meet to establish whether feasible alternatives exist. A meeting took place on 9 October 1983. However, the question of feasible alternatives was hardly touched on. NCC provided three suggestions which the District Council undertook to investigate with SMD. We have had no report of any subsequent discussions. The meeting on 9 October took place only two weeks before the Planning Committee meeting at which the District agreed that they were minded to approve the application.

2.2. The Nature Conservancy Council, with extremely limited and hard-pressed resources, have been able to produce evidence of alternative supplies worthy of more detailed investigation. The failure of SMD and the District Council to do so can only be due to a lack of effort on their part.

3. There is no immediate demand for the peat

3.1. Refusal of planning permission at this stage will not affect the operation of the distillery or the employment situation on Islay. The peat is required only in the medium term (see letter from SMD at Annex 6).

3.2. We understand that, at current production levels, there is a stockpile of 2-3 years' supply at Port Ellen Distillery. We were told that the consent to Messrs McIntyre and Brown on another part of the Site would provide a 7 year supply - at full production levels. SMD have failed to utilise this source.

4. A Site of International and national importance would be lost

4.1. The ornithological interest of the Site means that it qualifies for designation both as a Wetland of International Importance under the Ramsar Convention and as a Special Protection Area under the EEC Wild Bird Directive (79/409/EEC).

4.2. The intention of government to protect such Sites was stated by Mr Tom King, then a Minister in the Department of the Environment, in a written answer (see Hansard for 14 December 1982, cols. 100-102 - where the various interests on Islay are given simply as 'Islay').

4.3. The other interests of the Site are rated of GB importance for nature conservation.

NATURE CONSERVATION INTEREST
EILEAN NA MUICE DUIBHE, ISLAY

1. General Surface Features

Eilean na Muice Duibhe is an unbroken tract of gently sloping low level blanket peat falling in altitude from east to west. The peat surface is irregular and reflects undulations in the underlying raised beach deposits and varying depths of peat developed above this.* In one or two places these deposits outcrop through the peat mass and stand as definite hillocks of mineral soil or very shallow (eroding) peat.

There are major depressions and drainage seepages on the north east and south west sides of the site which have developed in response to the original drainage patterns on the raised beach gravels. Peat depth is very variable, ranging from less than half a metre to over 5 metres. The northern boundary of the bog is the Laggan River and the southern boundary the Duich River. The site is bounded to the east and west by roads (see map for site boundary details).

The centre of the bog is occupied by several systems of small lochs (dubh lochans), pools and bog hollows. The extent of these "pool systems" is annotated on the aerial photograph. There are three main systems, the largest in the north-west, the smallest in the south-east, separated from each other by broad natural seepages draining towards the Laggan River. Across the centre of the site and between the two main pool systems are large areas of almost level bog ('flows') with a very soft surface dominated by actively growing Sphagnum mosses.

2. Vegetation

The vegetation of the bog varies considerably over the site and this variation can be related to:-

i. Local conditions of peat depth, surface gradient and proximity to standing water, pools, pool overflow channels and main seepages and drainage basins.

ii. The detailed microtopography of the peat and Sphagnum surfaces.

iii. Local enrichment of the bog surface by geese and gulls.

iv. Localised effects of hand cutting of peat for domestic purposes and (more recently) a major area of machine cut peat extraction.

2a. General Vegetation Characteristics

Vegetation on the bog surface varies from parts which are very wet (permanent inundation), and where a continuous Sphagnum moss cover occurs, to others much drier and dominated by Empetrum nigrum and lichens. The latter type tends to occur on the shallow peats or where mineral ground outcrops.

In the main seepages Molinia caerulea is dominant and a classic blanket bog-poor fen plant community has developed, marking the natural transition from purely ombrotrophic into soligenous conditions.

The main peatland plateau is dominated by vegetation in which Eriophorum angustifolium, Calluna vulgaris, Erica tetralix, Molinia caerulea, Eriophorum vaginatum, Myrica gale and Trichophorum cespitosum dominate together with Sphagnum capillifolium and occasional hummocks of the moss Racomitrium lanuginosum and the lichen Cladonia impexa. This vegetation corresponds broadly to the Trichophorum-Eriophorum bog of Ratcliffe (1967)

*See Notes on diagrams of Altitude and Peat Depth and diagrams attached at pages 4, 5, 6, 7 & 8.

and the Erico-Sphagnetum magelanici of Birse and Roberts (1976). This Trichophorum-Eriophorum bog is extensive and the hummocks of Racomitrium lanuginosum (equivalent to the subassociation with Cladonia uncialis) are replaced in the wettest, most actively growing areas by prominent hummocks of the rare mosses Sphagnum imbricatum and S. fuscum.

Myrica gale is a frequent component of the vegetation and becomes locally dominant in places despite its dwarfed habit. Throughout the main flow areas there is an active Sphagnum surface beneath the vascular plant sward with S. capillifolium, S. magellanicum, S. papillosum, S. tenellum and, in wettest conditions and pools, S. cuspidatum.

Calluna is generally present throughout but rarely dominates, indeed a feature of the vegetation is its remarkable shortness. This is presumed to be resultant on the very wet, severely exposed conditions.

Where Sphagnum cover is highest, the dominant vascular plants are Erica tetralix, Eriophorum angustifolium, Rhynchospora alba and Myrica gale. This is the commonest plant association fringing the many pools and lochans.

Drier areas of bog surface are dominated by Empetrum nigrum with Cladonia impexa, Pleurozium schreberi, Eriophorum vaginatum and Myrica gale. Molinia caerulea is occasionally dominant in these drier areas, perhaps making a fire induced vegetation community.

2b. Poolside and fringing vegetation

Surface patterns on the bog vary from very large dubh lochans 200 m long with a fringe of Menyanthes trifoliata and Juncus effusus to small bog pools or Sphagnum covered bog hollows. Some of these hollows are dominated by Carex limosa with Sphagnum cuspidatum and Eleocharis multicaulis. Early stages of enrichment result in hollows being colonized by Juncus kochii and in some cases J. effusus. Because of the cyclic nature of goose usage (D Stroud pers comm), this response in the vegetation may be a temporary feature. The effects of gulls and/or geese are also responsible for the small hummocks of Molinia caerulea colonising the floating Carex limosa-Juncus bulbosus lawns in bog hollows. Margins of hollows and pools are dominated by Sphagnum species, especially S. magellanicum and S. papillosum. In these conditions the sundews, Drosera rotundifolia, D. intermedia and D. anglica occur. Drainage seepages, overflow channels and rills in the vicinity of pools have Sphagnum recurvum, S. cuspidatum, Juncus bulbosus and D. rotundifolia. Narthecium ossifgraum is common in these conditions.

The mosaic of pools is set amongst a wide expanse of relatively level Sphagnum-Eriophorum vegetation (the flows) which in places is quaking and through which small overflow channels run from pool to pool in times of flood. On the peripheries of these flat plateau there are occasional deep swallow holes ('sink holes') through which water disappears to flow along late glacial channels beneath the peat mass.

2c. Seepages and Flushes

On the northern side of the site and in the south western corner there are small topogenous flushes in which there are tall tussocks of Molinia caerulea and Schoenus nigricans in amongst bare peat or a mixed vegetation composed of Juncus bulbosus, Carex panicea, Menyanthes trifoliata, Carex limosa as well as indicators of more basic conditions such as Breutelia chrysochoma. There is a notable lack of Sphagnum, although S. papillosum, S. capillifolium and S. plumulosum do occur. Other plants occurring in this edge community are Succisa pratense, Narthecium ossifragum, Myrica gale, Calluna vulgaris and Drosera rotundifolia.

3. Hydrology

A significant feature of interest of the bog is the undamaged nature of the peat moss and its hydrology - standing surface water and drainage patterns. This is of particular nature

conservation value and is relatively unique in Great Britain. It adds considerably to the interpretation and understanding of the vegetation assemblages and patterns. The hydro-morphological characteristics of this bog combine features found on the flows of the Wigtownshire mosses (now mostly destroyed) and the pool systems of the high rainfall bogs of north-west Scotland. It can be considered to be hydrologically intermediate between these two types and in this respect has affinity with the Caithness flows, although vegetatively it is more closely related to Hebridean bogs.

4. Other features of interest

This site is the most important roost area in Islay for the wintering population of Greenland Whitefronted geese. Moreover, the number of geese regularly using this bog are thought to be the highest found on any one site in Great Britain. As such, this site can be considered to be the most important British site for this species.

Although the geese spend at least part of the day on rough fields or improved farmland, a significant amount of roost (nocturnal) feeding takes place. Of particular importance to the geese are the pool systems and the fringing vegetation in which Rhynchospora alba and Eriophorum angustifolium are common. These form important elements of their diet.

The flows and bog pools are breeding areas for Dunlin and Curlew and the larger lochs have breeding Red Throated Divers. Other breeding birds include Tufted Duck, Common Scoter, Herring Gull, Lesser Blackbacked Gull, Common Gull, Redshank, Sedge Warbler, Reed Bunting and Meadow Pipit. Wintering birds in addition to Whitefronted Geese include Hen Harrier and Short-eared Owl.

The bog pools and hollows provide classic conditions for dragonflies and the variety of micro-habitats associated with the pools, flows and seepages provide conditions known to be favourable to a wide variety of specialised invertebrate communities. Work on this is currently being carried out by Dr DJ Curtis of Paisley College (Biology Department).

5. Position in the National Series of Peatlands

Eilean na Muice Duibhe contains hydro-morphological features which are physically intact and transitional between the Wigtownshire flows (now mostly afforested and drained) and the pool system bogs of the high rainfall areas of north west Scotland (e.g. Claish Moss). There are only a handful of intact examples of this kind of low level blanket bog with a deep mass of peat developed over an undulating terrain below. There are no examples in England and in a British context the type is restricted to Scotland. In a European context this kind of bog is found only in Scotland, south west Finland and southern Sweden, where similar high rainfall-low evapotranspiration areas occur. Most Scottish examples have been destroyed for forestry, agricultural conversion or for peat extraction. The flow areas of these bogs lend themselves easily to machine peat cutting and milling for horticultural use.

The vegetation of Eilean na Muice Duibhe is very much akin to the Hebridean Blanket Bogs and as such the site forms an important habitat link in the national series of peatlands, both in a north-south and an east-west context.

Eilean na Muice Dubh.

Notes on diagrams of Altitude and Peat Depth.

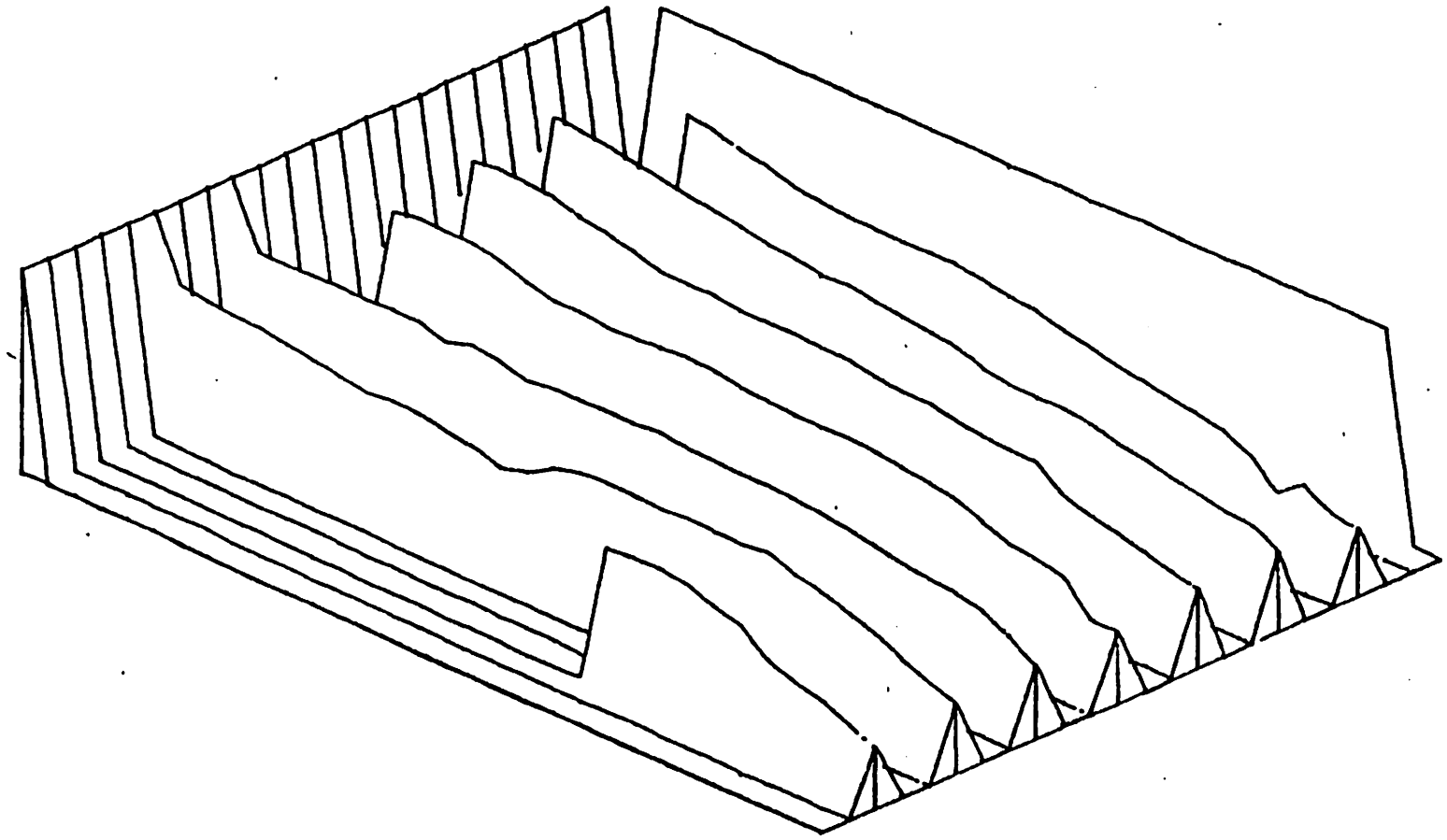
These diagrams are graphical presentations of data available for this peat bog. They represent transects spaced at ca. 300m intervals, with sample points at ca. 100m intervals along each transect. These are expressed as horizontal axes, the site being viewed from the NW or SW corner. In each diagram the vertical scale is indicated alongside the transect profiles. A run of zero values along the northern-most transect-line indicates portions of the plot (unsampled) outwith the peat bog.

Altitude: this shows characteristic convex appearance of a raised bog - and, if one ignores the data on peat-depth, is deceptively suggestive of potentially productive peat extraction. However...
Peat Depth: this profile shows tremendous variation across the bog with frequent occurrence of very shallow peat or near-absence of peat in an irregular pattern between deeper patches; this is contra-indicative of good peat extraction.

Dr. David J. Curtis,
Department of Biology,
Paisley College of Technology.
February 1984.

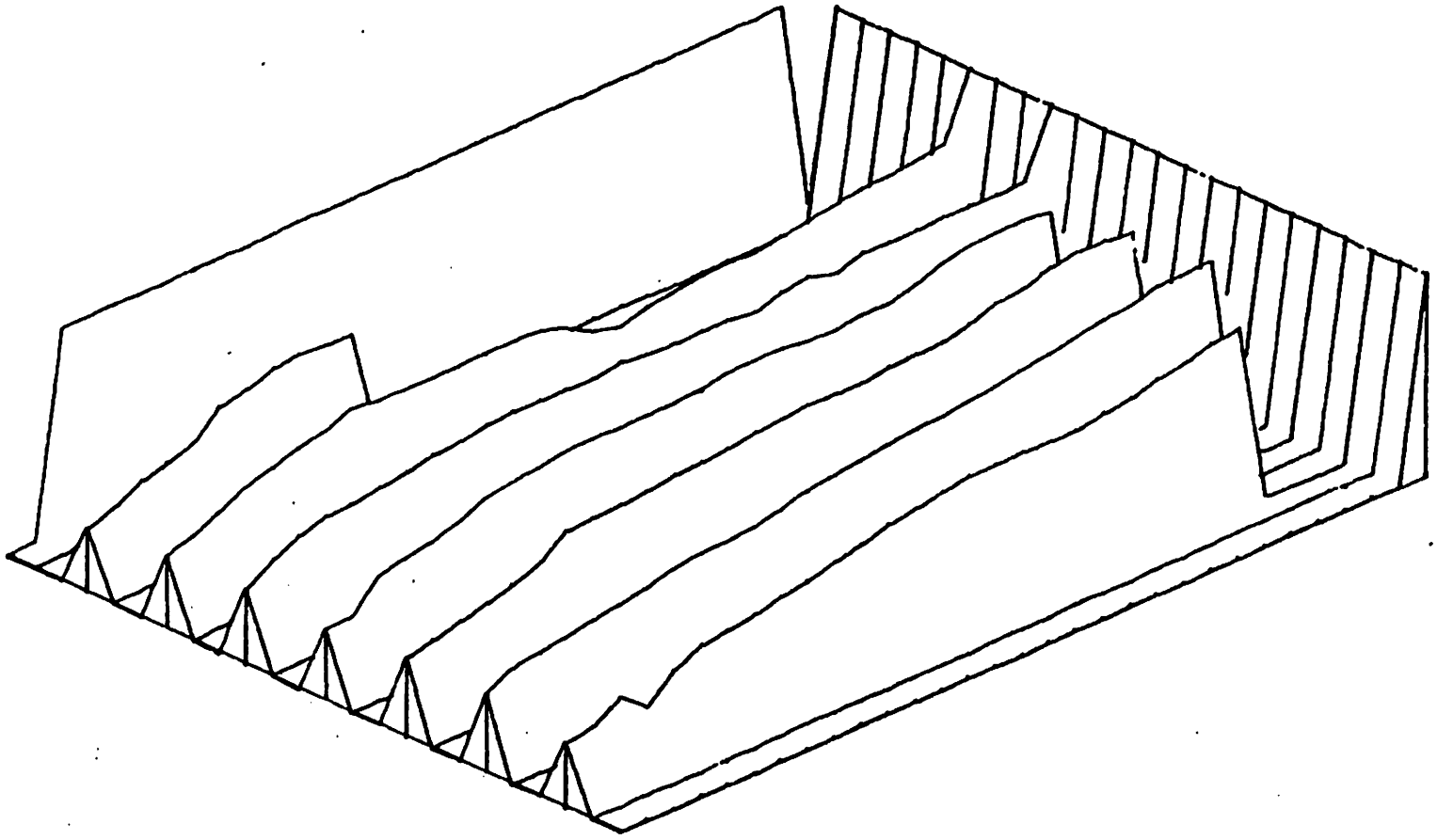
Eilean na Muice Dubh, Monadh na Cathag (from NW)

SCALE: 50m ALTITUDE



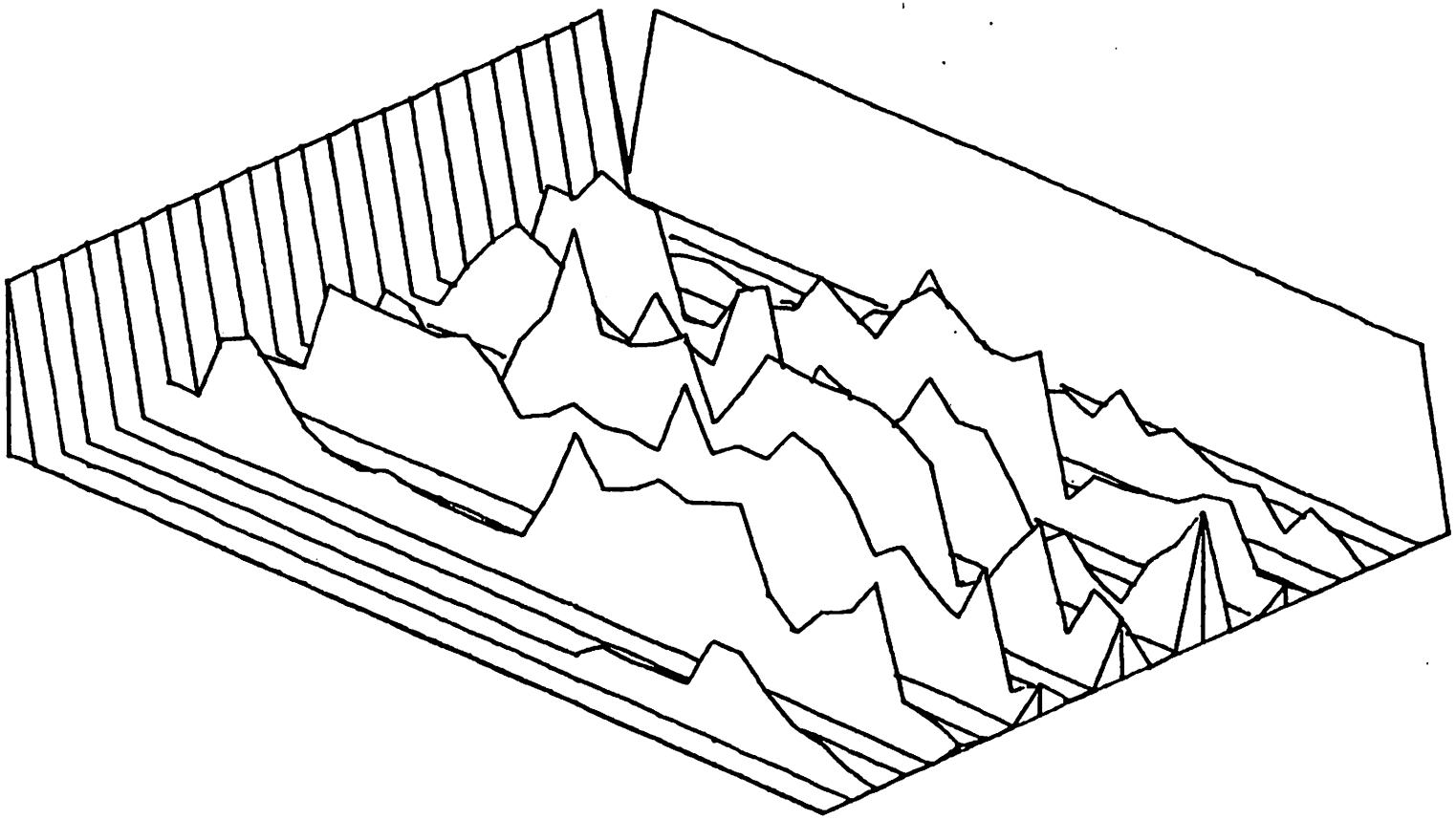
Eilean na Muice Dubh, Monadh na Cathag (from SW)

SCALE: 50m ALTITUDE



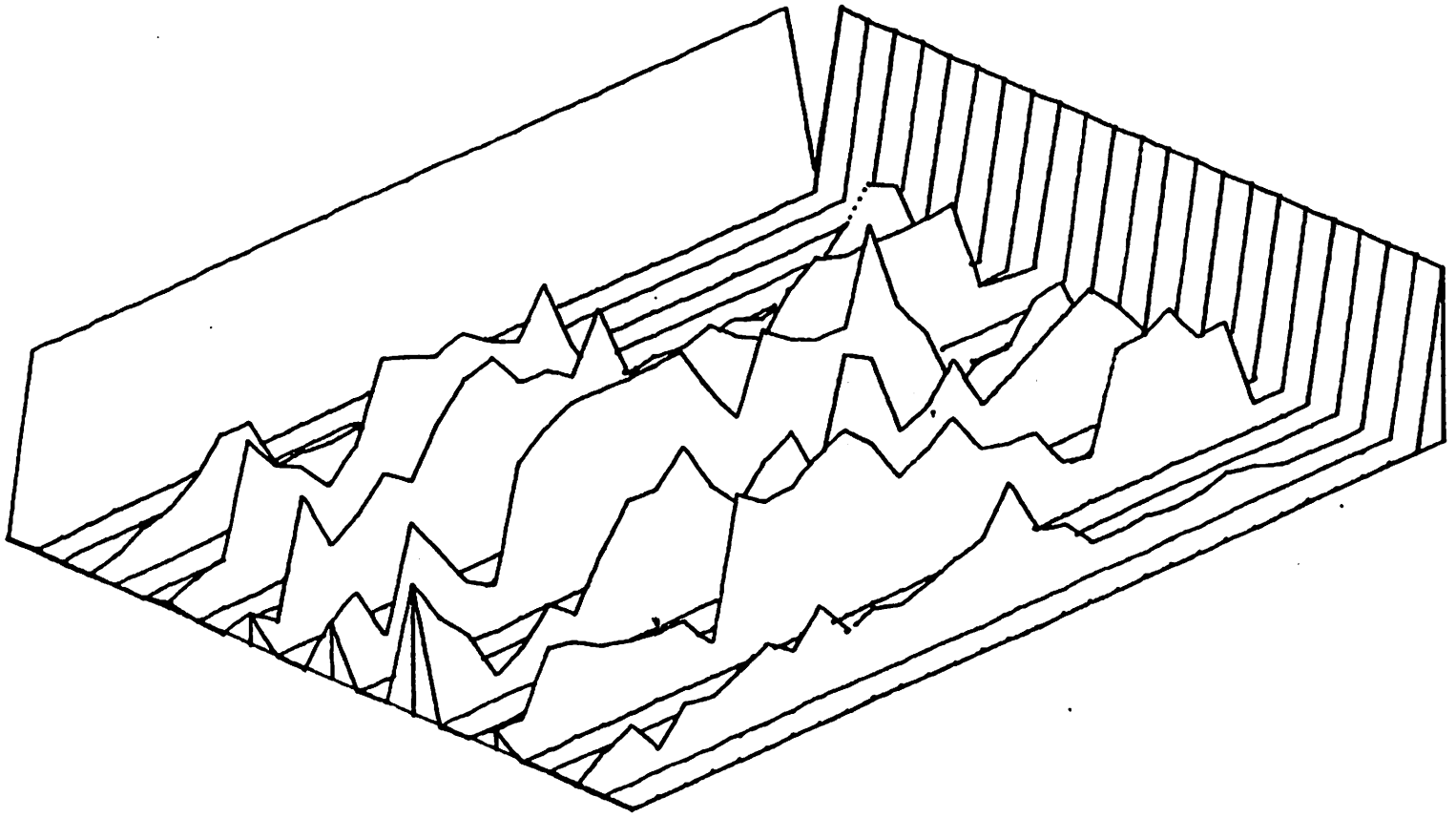
Eilean na Muice Dubh, Monadh na Cathag (from NW)

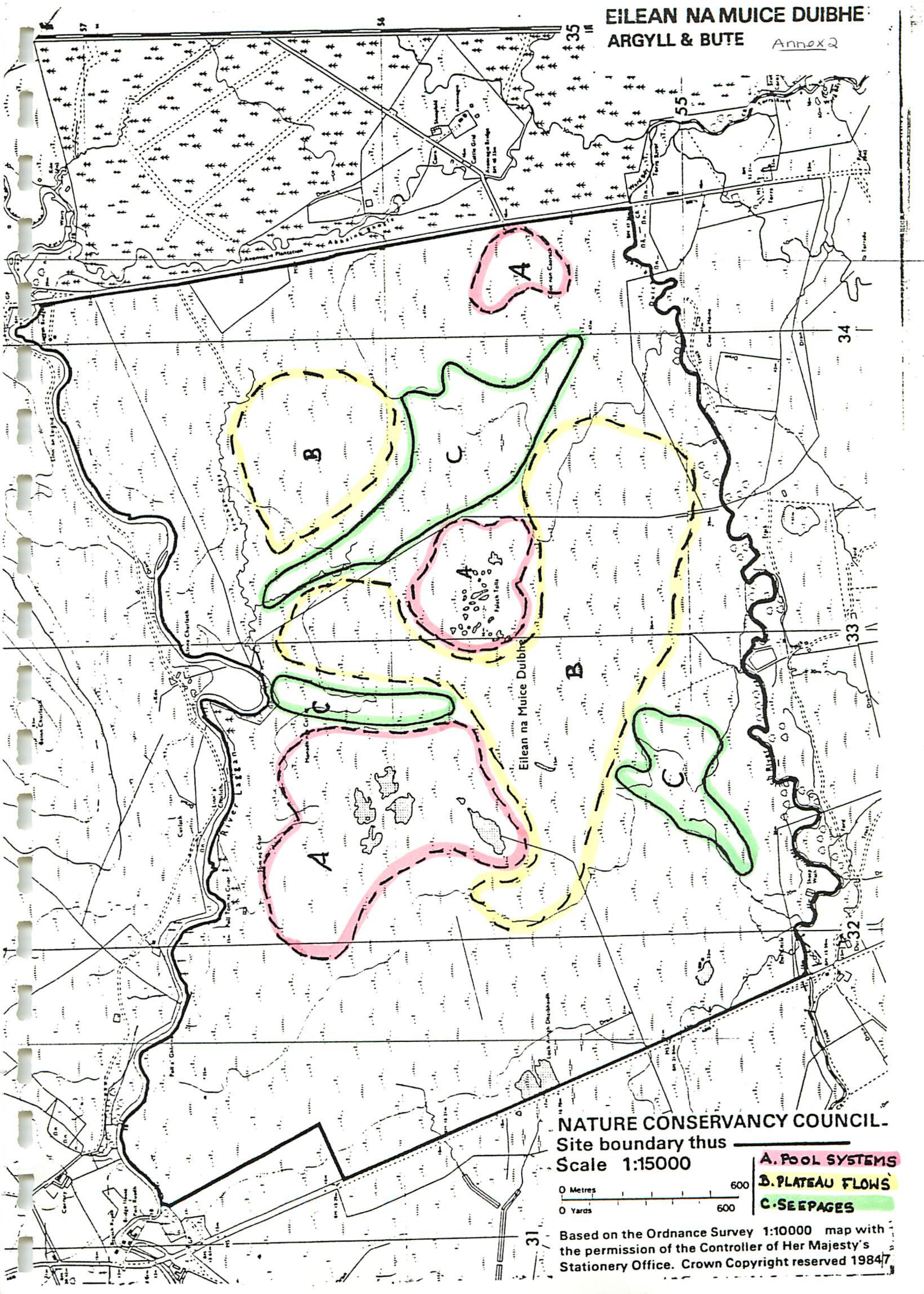
SCALE: 6m PEAT DEPTH



Eilean na Muice Dubh, Monadh na Cathag (from SW)

SCALE: 6m PEAT DEPTH

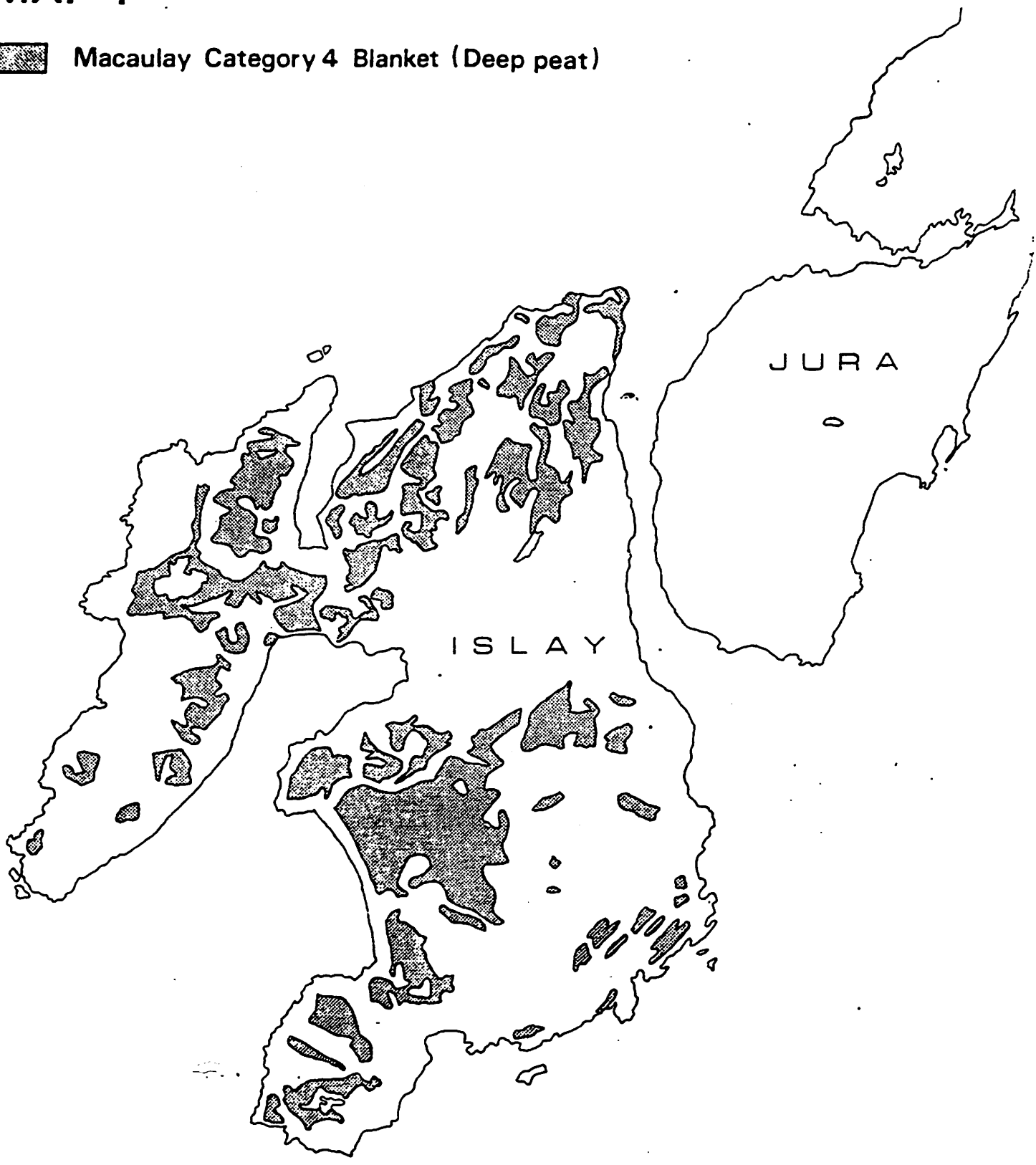



EILEAN NA MUICE DUIBHE
ARGYLL & BUTE
Annex 2
A
B
C
A
B
C
A
C
Eilean na Muice Duibhe
River Laggan
NATURE CONSERVANCY COUNCIL
Site boundary thus
Scale 1:15000
A. POOL SYSTEMS
B. PLATEAU FLOWS
C. SEEPAGES
0 Metres 600
0 Yards 600
Based on the Ordnance Survey 1:10000 map with the permission of the Controller of Her Majesty's Stationery Office. Crown Copyright reserved 1984

ANNEX 3

MAP 1

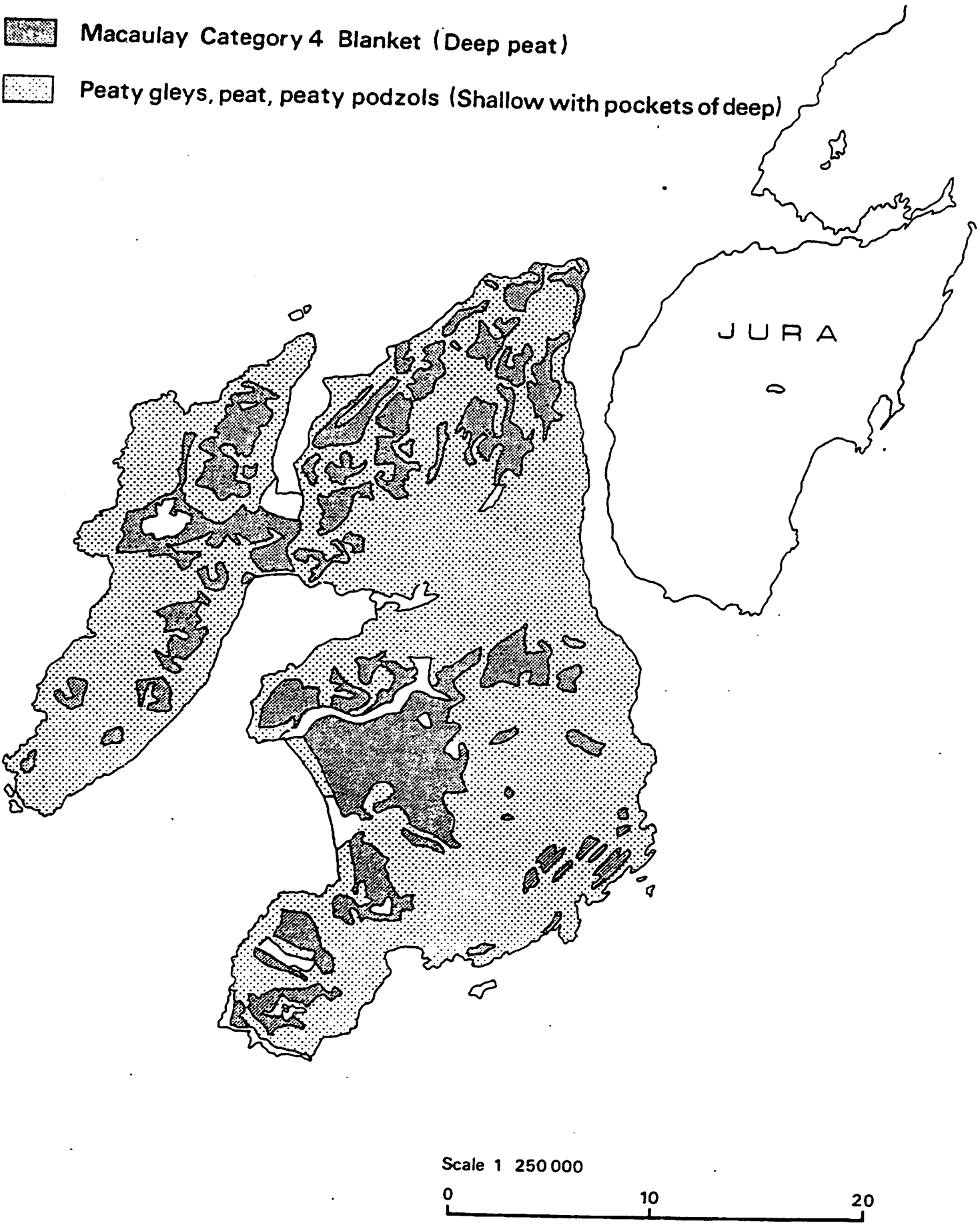
Macaulay Category 4 Blanket (Deep peat)



Scale 1 250 000

0 10 20

MAP 2


Macaulay Category 4 Blanket (Deep peat)
Peaty gleys, peat, peaty podzols (Shallow with pockets of deep)
JURA
Scale 1 250 000
0
10
20

ALTERNATIVE PEAT SITES

1. EAST LOCH GORM NR 2566

There are peat fields at the east end of Loch Gorm under the ownership of Mr D MacLachlan of Grulinmore, Ballinaby. This area has been cut for Port Ellen Distillery/maltings in the past and was of suitable quality. Cutting is believed to have ceased due to a disagreement between peat cutters and Mr MacLachlan. Mr MacLachlan is prepared for cutting to resume and, whilst there may be only limited supplies, there is at least a short term supply of peats of known quality.

2. CASTLEHILL NR 3651

North of Castlehill there is an extensive reserve of machine workable peat moss (deep blanket peat) of similar origin and quality to Eilean na Muice Duibhe and Laggan Bog. There are up to 300 ha of potentially viable commercial peat fuels. Peat rights to this moss were originally owned by SMD, who exchanged these for the rights at Duich when the owners of the ground (Laggan Estate) wished to sell for forestry. The vast peat resource here should at least be utilised before forestry takes place over the area. Access would be relatively easy (and cheap) and the site is close to Port Ellen.

3. STORAKAIG NR 4162

An area of relatively high level blanket peat (150m) south west of Beinn Dubh, north-west of Storakaig, there is approximately 100 ha of deep blanket peat on gently sloping terrain. The area is relatively remote and distant from Port Ellen, but supports good reserves of highly humified peat. The Dunlossit Estate are willing to discuss this or other sites on their land.

4. AVENVOGIE NR 3557

An area of low level blanket peat (30m) and part of the same original peatland cover that included Eilean na Muice Duibhe, Laggan Bog and the Glenmachrie and Ballivicar bogs. Peat depth is less than at 2 and 3 above, but the very flat surface lends itself to machine cutting. The quality of the peat is uncertain, access is easy and the bog close to Port Ellen - Dunlossit Estate.

5. OTHER POSSIBILITIES

Whilst NCC have not had the resources available to fully survey all the potential deep peat areas and possible alternatives, we feel that detailed survey could produce other alternatives not included above. For example, no work has been carried out on The Oa east of Port Ellen.

The Nature Conservancy Council feel that it is particularly timely for such a resource survey in view of both this application and the rapidly expanding forestry initiatives in Islay. Afforestation of peatlands will not only limit the peat available to the whisky industry and for domestic use but will also increase the possibility of conflict between nature conservation and peat extraction. This question is likely to be raised as an issue in the Islay Local Plan.

ALL COMMUNICATIONS TO BE ADDRESSED TO THE REGISTERED OFFICE

SCOTTISH MALT DISTILLERS LTD.

Registered at Edinburgh under No 9211

REGISTERED OFFICE

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73193

23rd June, 1983.

1273

JBP.

J. Pendlebury, Esq.,
Depute Regional Officer - S.W. Scotland,
Regional Headquarters,
The Castle,
Loch Lomond Park,
BALLOCH,
Dumbartonshire, G83 8LX.

24 JUN 1983.

Dear Mr. Pendlebury,

Further to our telephone conversation yesterday regarding your proposal that the Peat Contractors on Islay, Messrs. MacIntyre & Brown, should cut peat exclusively for our purposes in the already developed part of the Duich Moss, I would agree that as an interim measure this may well prove satisfactory, but obviously a meeting will have to be convened in order to discuss more fully the implications of such a proposal. Nevertheless, our application to build a road into the moss, leading to the subsequent drainage and development of the moss, is now in the hands of the Secretary of State and we reserve the right to hold to our original intentions in the area, depending on the outcome of the Scottish Development Department's decision on our application.

As I said to you at our meeting on 10th June, it is not the immediate timescale which is pressing but a longer term view of how we will secure sufficient peat to satisfy our distilling requirements on the island. There is no future in making whisky on Islay if the peat element is inadequate or extraction costs become prohibitive because the peat moss is uneconomic to work.

Yours sincerely,

K G MacKenzie

Dr. K.G. MacKenzie,
MANAGING DIRECTOR.

KGM/PD.