

Consultation response to Scottish Government

Ending the Sale of Peat in Scotland

Scottish Wildlife Trust

12 May 2023

We support the Scottish Government's high-level ambition regarding the need for more robust measures to end the commercial extraction of peat for horticulture. However, we need to see more clarity on timescales to be convinced the Government is treating this as an urgent issue.

The Scottish Wildlife Trust welcomes this opportunity to respond to the Scottish Government's consultation on Ending the Sale of Peat in Scotland.

Question 1

You or the organisation you represent

Please tell us about you and any company or organisation that you represent.

To find out how we handle your personal data, please see our privacy policy.

1. Which of the following best describes you or the business you represent? (Answering this question will help us to categorise your responses)

Representative of an environmental non-governmental organisation (eNGO)

Please specify if necessary

The Scottish Wildlife Trust champions the cause of wildlife through policy and campaigning, demonstrates best practices through practical conservation and innovative partnerships, and inspires people to take positive action through its education and engagement activities. It also manages a network of over 100 wildlife reserves across Scotland and is a member of the UK-wide Wildlife Trusts movement.

3. How many employees are there in your organisation?

	Less than 10
	10-49
\boxtimes	50-249
	250+

Your use of peat

We want to understand the various uses of peat including why peat is used in horticulture.

Please answer the following questions to let us know why you use peat and, for horticultural use, how you decide on which growing medium to use. We're interested in whether you consider environmental impact and how easy it is to find alternatives to peat for your use.

Related Information: Growing media/medium is often referred to as "potting compost". It can be composed of various substances such as coir, compost or peat

and may be a blend of more than one of these. It can be bought in bags in shops such as garden centres, DIY stores or supermarkets. The term also refers to any "potting compost" within container-grown plants sold to the public.

4. For what purpose do you use peat?				
Gardening – professional Gardening – amateur Growing ornamentals – professional Growing fruit/vegetables – professional Retail sales Business to business sales of peat Heating - extracted from own/rented land for own use as fuel Heating - buy for own use as fuel Heating - sell for fuel Food/drink production processes (please specify) Other (please specify)				
Please specify if necessary				
For full information regarding alternatives to peat please refer to the IUCN "Demonstrating success" work:				
https://www.iucn-uk-peatlandprogramme.org/news/peat-free-horticulture-addendum-further-case-studies-released				
5. Do you consider environmental impacts when using peat?				
If so, please explain your concerns and the measures you take to avoid using peat				
Yes - Commercial peat extraction damages and destroys some of Scotland's rare lowland raised bogs. Viable peat-free composts and growing mediums are				
commercially available, and numerous high-profile gardeners have moved to completely peat-free gardening methods, showing that peat usage is not essential				

for successful horticulture. Our own tree nursery, Little Assynt Tree Nurseryi, has

been successfully producing native trees peat-free since 2018.

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Doubours						
Doutous	Not important	Quite	Important	Very important		
		important				
Performance						
Cost		<u> </u>				
Consistent						
product quality						
Environmental				X		
consequences						
Brand loyalty						
Do you have any	other considera	tions? Please e	explain here			
IN/A						
We would like to know how easy it is to understand what is contained within bags of growing medium and potted plants and how this could be improved to allow consumers to make informed choices. 8. Is the information provided on growing media packaging (e.g. printed on bags of compost) or signage sufficient to allow you to make an informed decision regarding: Yes No I don't look at information on						
	Yes	No		information on		
the environment		No				
the environment impact of its contents?		No		information on		
impact of its	tal	No		information on		

Enhancing Scotland's Wildlife scottishwildlifetrust.org.u	ık				
☐ I don't wish to know what growing medium the plants I buy are growing in The plants I buy display information detailing the growing medium used Please use this box if you wish to share further views on labelling					
Peat-free gardening methods should be informed, for example, by stating the percentage of soil material used and its origin. Also, incorporating maintenance methods will help customers better maintain soil nutrients and avoid unnecessary repurchases.					
10. If you are a retailer/grower, how difficult would it be to indicate whether peat is present in growing medium within pots?					
☐ Impossible☐ Difficult☐ Fairly Easy☒ Very Easy					
Please provide any further explanation here					
Our own tree nursery, <u>Little Assynt Tree Nursery</u> ⁱⁱ , has been successfully producing native trees peat-free since 2018.					
Maying away from value part					
Moving away from using peat					
Your views will help inform timescales for ending the sale of peat. It is important that we have a clear vision of how you or your business will be affected by a peat sales ban.	t				
One approach to ending the sale of peat might be to apply a general ban on the sale of peat (for all purposes) with exemptions, some time-limited to allow for transition. The questions here will help us to develop policy and devise timescales.					
A wide range of responses from all users of peat will help us to form a bigger picture and aid our policy development.	;				
11a. Could you or your company stop using peat now?					

Please provide any further explanation if required				
We do not use peat. Within the context of a nature and climate emergency, we must rapidly proceed towards a situation where all horticultural growing media are produced from sustainable sources.				
12. Are there any plants for which peat is vital for growth and you are not aware of suitable alternatives?				
If yes, please provide further information				
Peat-free composts are widely available and have excellent results in many species. The quality of peat-free alternatives has improved over the years, covering the necessities of a growing market ⁱⁱⁱ . To have a successful gardening experience, it is necessary to study, follow the instructions on the packaging and read a clear label that helps to find the peat substitute that delivers the best results. Lastly, it is crucial to pay attention to the fertilizer requirements. ^{iv}				
13. Is peat necessary for propagation (raising a plant from a seed/bulb/corm/tuber/vegetative cutting)?				
Yes (please specify)				
No Sometimes (please specify)				
Contentines (please specify)				
Please specify if necessary				
N/A				
14. Are there any instances where a % of peat should be permitted within a container-grown plant and what are those instances?				
 ☐ A small percentage should be allowed to account for that which is transferred when replanting propagated material ☐ A percentage should be allowed, for a finite period of time, to facilitate transition away from peat for certain plants (please specify plant and %) ☐ Other (please specify) 				

Please explain further if necessary

No - The IUCN UK Peatland Programme in its UK Peatland Strategy 2018-2040 (IUCN UK peatland Programme 2018) exposed that over 80% of the UK's peatlands are damaged and need crucial recovery approaches. The strategy targets the restoration or sustainable management of 2 million hectares by 2040. Horticultural peat implies peatland drainage and removal, which rest benefits of peatland in terms of biodiversity, climate change, and water vi.

We support horticultural practices that have moved on from the need for commercial peat extraction.

As peat-free composts are commercially available, it is possible for gardeners to access peat-free gardening methods. Peat usage is not crucial for effective amateur or professional horticulture activities. Horticulture was developed before the 1950s without peat. Many countries with low peat availability rely on organic raw materials, including bark, wood fibre, coir, and compost products, to develop successful horticultural industries^{vii}. Therefore, there is no need to allow a small, unclear percentage of peat to be used for gardening.

15. Should there be a ban on the sale of peat and peat-containing products in Scotland?

\boxtimes	Yes - for all/ most peat sales
	Yes - for all horticultural peat sales
	Yes -for retail horticultural peat sales (amateur/hobby gardeners)
	Yes - for professional horticultural peat sales
	No

If yes, please explain anything that should be exempt

Yes - We support the need for stronger measures to end the commercial extraction of peat for horticulture. We urgently need to protect peatlands. Peatland habitats provide food and shelter to rare plants and insects, are important bird breeding sites, and vital reptile basking sites. In addition, peatlands are the largest terrestrial carbon stores on earth, storing twice as much carbon as all of the world's forests. They purify our drinking water and protect us from flooding^{viii}.

Commercial peat extraction should be banned because of its high environmental impact^{ix}. We support a ban on the sale of peat-containing products, including the the purchase of peat in all contexts, and allows existing peatlands not to be mined but restored through well thought schemes. When a peatland is damaged, it cannot provide its benefits. Quite the contrary, it releases thousands of tonnes of carbon back into the atmosphere.

The industry already recognised that peat extraction is unsustainable, and the population awaits environmental consideration recognising the biodiversity and climate change impact across the supply chain^x. Peat-free compost from a mixture of organic materials (e.g. composted bark, coconut fibre, wood fibre and green compost) mixed with inorganic materials (e.g. grit, sharp sand, rock wool and perlite) can provide a balanced compost able to replace peat use^{xi}. Therefore, It is time to move forward and end peat sales for horticultural proposes in any context.

17. In what year should peat sales stop for retail horticulture (amateur/hobby gardeners)?

Please state year

We support ending the peat sale for horticulture in 2023 or as soon as possible thereafter.

Commercial peat extraction damages and destroys some of Scotland's valuable lowland raised bogs, and there are well-known commercially available peat-free composts.

Numerous high-profile gardeners have moved to completely peat-free gardening methods, showing that peat usage is not essential for successful horticulture. By 2021 the retail gardening sector was already quickly moving forward to the end of peat sales in growing media and soil conditioners; the industry is approaching having peat-free plants^{xii}. According to the recently released IUCN UK Peatland Programme 'Peat-free Horticulture – Demonstrating Success: Addendum Report 2023' in the UK, in 2022, retailers presented a wide range of competitively priced peat-free materials to customers, with some establishing commitments to being peat free and several having already achieved that target^{xiii}.

Therefore, we support ending the peat sale for horticulture in 2023 or as soon as possible thereafter. Peat-free composts are already commercially available, and we need to put urgency into tackling the twin crisis.

18. In what year should peat sales stop for professional horticulture (growers/landscapers/producers/business to business horticultural enterprises)?

Please state year

We support ending the peat sale for horticulture in 2023 or as soon as possible thereafter, as peat-free composts are already commercially available. For example, sustainably harvested Sphagnum moss can be successfully used for professional horticulture, and it could be grown and harvested as part of peatland restoration. Sphagnum farming can offer an opportunity to protect and recover neighbouring nature management zones^{xiv}. Moreover, nursery plant growers are already using peat-free growing media.

19. In what year should peat sales stop for other uses? (please specify)

Please state year. You may break this down to different years for different parts of the sector.

The majority of peat extracted in Scotland is used for horticultural purposes and the rest for "other uses" such as animal bedding, domestic fuel, whisky production and mushroom compost^{xv}. The policy should protect carbon-rich soils, and to do that, it should be significantly strengthened on:

- Removing vague ambiguity around what type of industry is acceptable on peatland
- Removing ambiguity over any exemptions, any "industry of national importance" must be specified with rationale.

There is no clarity on how the Government will identify and apply criteria for each sector (e.g. peat for fuel, whisky or other industries) and also review their responsibilities and commitments, wider than restoration, for example, planning policy, that need to be made under realistic time frames that recognize the urgency need it to tackle the climate and biodiversity emergency.

Understanding the Impact of Banning the Sale of Peat

We want to understand the impacts, both positive and negative, that banning the sale of peat may have on stakeholders.

Please answer these questions to share your views with us.

20. Please explain any potential costs or burdens that you or your business might face as a result of the outcomes arising from this consultation

Please describe any costs or burdens

If we do not ban peat sales for horticulture, we risk massively exacerbating the nature and climate crisis -making a living, breathing, and carrying out business very difficult for everyone.

21. Could outcomes arising from this consultation have implications, positive or negative, for the environment?

Please explain potential implications for the environment

Positive implications for the environment^{xvi} xvii:

- Stopping peat extraction and encouraging peatland restoration efforts. This would raise water tables, decrease greenhouse gas emissions, and recover peatland vegetation and linked wildlife.
- -Encouraging a more competitive, secure, and viable sustainable horticulture industry that supports the principles of a green economic recovery.
- -Increasing the range of peat-free products available in local markets, diversifying the supply chain.
- -Educating the population on how gardens work and how plants' needs can be satisfied using different materials and which are best suited for each particular purpose. Knowledge transfer is crucial to transition toward a peat-free horticulture quickly^{xviii}.
- -Working with mainstream producers that supply products for both gardeners and professional horticulturists targeting both markets.
- -Promoting alternatives that consider efficient zero waste management. For example, composted green waste helps reduce the need for landfill.
- -Inciting innovative approaches that lead to using by-products from other industries, which reduce pressure on peat extraction.
- -Encouraging peat-free horticulture in environmental and gardening public gardens and training for peat-free gardening.
- -Promoting pro-environmental actions supporting a peat-free horticulture approach in individuals and community groups.

Negative implications for the environment:

- -Inciting extraction of another growing media can lead to a different environmental problem. All currently employed peat cannot be replaced by one material; therefore, a diverse group of peat-free materials will be needed for horticulture.
- A large environmental footprint of substitutes. There will be the need to assess the footprint of the supply chain (e.g. to do a Life Cycle Assessment).
- The environmental cost is not reflected in the market price of peat substitutes.

22. Might outcomes arising from this consultation affect one age group more than another, either in a positive or negative way? Please specify and explain.

Please specify age group and provide explanation

Yes - Amateur and professional horticulture were developed before the 1950s without peat. Adults and the elderly have been using peat for gardening for a while, but that does not mean they cannot move to substitutes (as many have been), as the younger generation has been exploring. More education regarding existing peat-free alternatives is needed: what is their cost, how to use them, and where to find them.

Gardeners are already involved in platforms that can help communicate peat-free availability.

24. Could any outcomes arising from this consultation have any positive or negative impacts on those on low incomes or in socio-economically disadvantaged areas?

Please specify impacts on socio-economically disadvantaged groups or areas

No - Peat prices used to be lower than peat-free products, but with increased peat market cost, that gap has been reduced. Overall, the peat price does not suggest the environmental cost of the extraction: peat removed in a human lifetime cannot be fully replaced by restoration. That makes peatland extraction unsustainable^{xix}.

Climate and breakdown disproportionately negatively impact those in areas of multiple deprivations.xx

25. Might any outcomes arising from this consultation have any positive or negative impacts specific to island communities?

Please specify potential impacts on island communities

In the UK, research has been carried out to produce knowledge and skills to produce sustainable sphagnum from trial plots to a large-scale^{xxi}. There is potential for island communities to develop sustainable sphagnum production for peat replacement products – providing innovative economic opportunities for rural communities.

Anything else you'd like to tell us

26. Please use this space for anything else you'd like to tell us in relation to ending the sale of peat.

To put it simply, there is no point turning on the proverbial bath taps of funding and policy coherence if we have not put in the bath plug of ending commercial extraction.

The end of the sale of peatland for horticulture is an opportunity to refocus financial and technical efforts toward peatland restoration. Since 2012, peatland restoration in Scotland has been accomplished on over 25,000 hectares, mainly via the Peatland Action (PA) program administered by NatureScot. In 2020, the Scottish Government raised the investment in peatland restoration by more than £250 million over the next decadexxii. Recently, the Scottish Government announced £1.8 million in shares of funding to increase the private investment scale for projects to restore and improve the natural environment^{xxiii}. Scotland can have a crucial opportunity to be recognised internationally as a leader in climate and nature with the ability to influence others. But to achieve that, there is a need for a mainstreaming nature delivery across government that establishes nature as an overarching governmental duty whilst contributing towards monitoring and transparency. We urge the Scottish Government to explain how it protects peatlands without industry exceptions. We welcome the awareness of peatland restoration, but there is also a need to ensure greater policy coherence with other strategies and policies, such as the Draft National Planning Framework 4, Land Use Strategy, Regional Land Use Partnerships, the new Scottish Biodiversity Strategy, the forthcoming Natural Environment Bill, addressing peatland management.

The UK Climate Change Committee (2022) evaluation shows that adaptation efforts implemented in Scotland do not address climate risk with the needed scale and urgency. The report states, "Other terrestrial habitats and species: Rates of peatland restoration, which is needed to make these habitats resilient to climate risks, are falling well short of the Scotlish Government's targets" xxiv.

We support the Scottish Government's high-level ambition regarding the need for more robust measures to end the commercial extraction of peat for horticulture. However, in this consultation document, we do not see urgency on timescales, which can risk the potential of the consultation to deliver transformative change under the current needs. We acknowledge that this consultation seeks to gather expertise and point of view from different stakeholders involved, but we need to see clear flagging around the urgency and how it is envisioned across the government.

https://www.iucn-uk-

11/Demonstrating%20Success%20Peat%20and%20Horticulture%202021 1.pdf

vi IUCN UK Peatland Programme (2014) 'Briefing Note No 6 'Commercial Peat Extraction''. Available at:

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viii Scottish Wildlife Trust (2023) Protecting peatlands. Available at: https://scottishwildlifetrust.org.uk/how-to-help/make-a-donation/appeals/scotpeat/

^{ix} Holmes, S. & Bain, C. (2021) 'Peat-free Horticulture – Demonstrating Success', IUCN UK Peatland Programme, Edinburgh. Available at: https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2021-11/Demonstrating%20Success%20Peat%20and%20Horticulture%202021 1.pdf

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xv IUCN (n.d.). Review of extant planning permissions for commercial peat extraction in Scotland. Available at: https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2019-

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<u>peatlandprogramme.org/sites/default/files/2022-01/IUCN%20Demonstrating%20Success%20Booklet_UK.pdf</u> wii Holmes, S. & Bain, C. (2021) 'Peat-free Horticulture – Demonstrating Success', IUCN UK Peatland

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^{iv} Holmes, S. & Bain, C. (2021) 'Peat-free Horticulture – Demonstrating Success', IUCN UK Peatland Programme, Edinburgh. Available at: https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2021-

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