

Banning retail sale of peat in horticulture in England & Wales **Wildlife & Countryside Link response to Defra consultation**

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 65 organisations to use their joint voice for the protection of the natural world

Introduction

We welcome this consultation from the Department of the Environment, Food and Rural Affairs, and the proposals it advances to ban the retail sale of peat.

We have provided responses to the questions where the expertise of our members can add relevant evidence and suggest useful enhancement to the core proposals. Our responses to consultation questions, drawn from members of Link's Agriculture and Blueprint for Water groups include the following recommendations:

- That the voluntary approach to this issue should be replaced by a retail ban.
- That the sale of peat products to amateur gardeners should end as soon as possible, with 2024 as the red-line date.
- That other measures such as the reporting of peat sold and peat labelling should only be introduced alongside a legal ban, to help with the transition to peat free sales.
- That a ban should also be extended to the professional sector.

Response to consultation questions

Business as usual; continuation of the voluntary approach

Question 3. Our current approach consists of voluntary targets to end the use of peat in horticulture by 2020 for the amateur sector. Should we continue with the voluntary approach?

No. As noted in the consultation document, the voluntary approach 'has not delivered'. The voluntary target agreed between industry and government in 2011 to end sales of peat for the amateur horticulture sector by 2020 was missed, by a wide margin. In 2019, peat still made up over 40% by volume of the growing media sold in the retail sector despite the 2020 target.¹ A 2021 survey by the Wildlife Trusts, a full year after the deadline had passed, found that only one of 20 leading garden retailers planned to eliminate peat from its shelves that year.²

The failure of the voluntary approach is not a surprise. Voluntary, industry-led action is rarely an effective means of achieving environmental or health goals, even where intentions are good. Examples of this abound, from the store specific (see the 2001 commitment from B&Q to phase out peat by 2011, ten years on from the deadline peat products are still in B&Q stores³) to the global (see the 'New Plastics Economy Global

¹ <https://friendsoftheearth.uk/nature/governments-2020-peatfree-target-way-track>

² <https://www.wildlifetrusts.org/news/survey-top-retailers-only-one-20-says-they-will-eliminate-peat-year>

³ <https://www.endsreport.com/article/1556793/b-q-aims-stop-selling-peat-within-10-years>

Commitment' to grow the use of re-usable packaging by industry by 2025, which recorded a 0.1% increase in re-usable packaging in 2020⁴).

The demonstrated inefficacy of a voluntary solution on peat products compares poorly with the scale of the challenge, and with the public's desire to grow and garden without peat.

Peatlands are the UK's biggest carbon sink, storing around 3.2 billion tonnes of carbon. Globally peat holds twice as much carbon as all the world's forests. However, due to its poor condition, much of the UK's 2.6 million hectares (ha) of UK peatland is no longer actively capturing carbon. Estimates suggest it could be emitting 23 million tonnes of carbon dioxide equivalent each year. This equates to approximately half the amount released through the nation's agricultural sector. In addition to the climate consequences, peat extraction harms nature, damaging habitats for rare species of flora and fauna, and negatively impacting peat's ability to prevent flooding and filter water.⁵

Peat extraction for horticulture is one of the causes of this environmental degradation. In 2008, 38% of peat used in UK horticulture came from UK peatlands.⁶ Recent data compiled by the Wildlife Trusts shows that 900,000 cubic metres of peat were extracted from UK soils for use in UK horticulture in 2020, comprising 39% of peat used, a slight increase on 2000. When combined with the 1.4 million cubic metres imported from the European Union for use in UK horticulture, the combined total 2.29 million cubic metres of peat extracted for UK horticulture in 2020 could have stored approximately 238,000 tonnes of carbon for millennia to come. Instead of such storage, the extraction could release up to 880,000 tonnes of CO₂, equivalent to driving an average passenger car 2.2 billion miles.⁷

To continue to extract peat to use for horticulture is to continue to turn a carbon sink into a carbon emitter whether that peat originates in the UK or is imported. This is why the Climate Change Committee (CCC) has called for an end to all peat use in horticulture by 2023⁸ as part of a wider restoration of UK peatlands. The Climate Change Committee's June 2021 report to parliament re-stated this call as a priority recommendation.⁹

An urgent and comprehensive end to peat extraction for horticulture is essential if the net zero by 2050 target is to be met. The voluntary approach has been shown to be incapable of delivering this.

Question 4: If we were to revise the date for ending the use of peat in horticulture for the amateur sector, when should that date be?

The impact of peat use in horticulture has been discussed for decades – the issue has been considered for long enough. Two years have already passed since the 2020 target was missed. Immediate action should be taken to end all uses of peat in horticulture, to meet the clear Climate Change Committee deadline of an end to peat sales before 2023.

⁴ <https://www.unep.org/news-and-stories/press-release/global-commitment-2020-progress-made-acceleration-needed-meet>

⁵ <https://www.wcl.org.uk/charities-call-out-companies-on-climate-harming-compost.asp>

⁶ http://pixelrauschen.de/wbmp/media/map03/map_03_08.pdf

⁷ <https://www.wildlifetrusts.org/news/devastating-using-peat-uk-horticulture>

⁸ <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

⁹ <https://www.theccc.org.uk/wp-content/uploads/2021/06/CCC-Joint-Recommendations-2021-Report-to-Parliament.pdf>

Failing that, an absolute red line date for ending the commercial trade of peat for professional uses should be before 2025, with the sale of peat products to amateur gardeners ending in 2024 at the latest, as per the government's current proposed commitment. The Climate Change Committee deadline of 2023 was set in January 2020, giving a timeframe of between two and three years for delivery in the horticulture sector. The same timeframe applied to the date of this consultation gives a deadline of before 2025.

Mandatory reporting of the volume of peat sold (all sellers) Questions 5-14

The questions in this section are largely aimed at retailers. However, the environmental groups we represent have engaged at length on this topic and we would make the following observations:

- As a measure alongside a legislative ban on the commercial trade of peat, auditing peat selling through mandatory reporting will be a useful tool to track progress across the gardening sector in preparing for full implementation of the ban.
- As a stand-alone measure without a ban on the commercial trade of peat, mandatory reporting will have a much-reduced effect. General consumer awareness of peat issues is limited and consumer pressure to move to peat-free products, enabled through a reporting system, will not on its own be sufficient to end peat usage.

Ban the retail sale of peat and peat containing products

Question 15: Do you think there should be a retail sales ban for peat and peat containing products in England and Wales?

Yes. Given the failure of the voluntary approach and the urgent need to end the commercial trade of peat in horticulture for environmental and climate reasons, a retail sales ban should be swiftly introduced. One of the reasons for the failure of voluntary action has been the perception of first mover disadvantage amongst leading garden retailers, due to the increased price of alternatives compared to peat and increased production costs. A ban would level the playing field, compelling the industry to move as one.

A ban would have the backing of the British public. YouGov research carried out for Wildlife and Countryside Link in 2021 revealed that most British consumers want to see peat-based compost banned when the issues are set out. Only 5% of those polled oppose the banning of peat-based compost, with 47% supportive, 22% neutral and 26% unsure.¹⁰

Question 16: Will it be feasible to implement a sales ban for the retail sector by the end of this parliament (2024)?

Yes. Alternatives to peat-based compost are increasingly available to retailers, including coir dust (from coconut husks), green compost wood fibre, bracken, bark and wool. Gardeners can also make their own high-quality compost at home. Over 100 entirely peat free nurseries¹¹ are currently operating across the UK and

¹⁰ https://docs.cdn.yougov.com/ibda0309lw/WCL_Results_210125.pdf

¹¹ <https://dogwooddays.net/2020/04/30/updated-peat-free-nurseries-list/>

leading planting contractors have been peat free for some years.¹² The options are there for leading garden retailers to go entirely peat free. A ban will ensure that happens.

There is also considerable scope for a peat ban to be accompanied by improved public information and acquisition of skills to build confidence in growing without peat. This can be assisted by the horticultural trade but should not be left to the sector alone. There is also the opportunity to change the waste stream by local processing of domestic compostable materials, involving new jobs, skills and supply chains, and returning this to householders, community projects and local businesses in the form of low-cost locally processed compost.

Question 17: Are there industries other than the horticultural industry that will be severely affected by a ban of the retail sale of peat and peat containing products? [If 'yes'] which industries?

The public sector continues to procure peat for horticultural use, due to a 2015 commitment to immediately end the public procurement of horticultural peat being missed. The Forestry Commission still uses peat for the production of some tree saplings, as do some local authorities. CPRE conducted a Freedom of Information survey of 232 local authorities in 2020, which found that 19.4% (45) actively still use peat. These public bodies may need extra support to meet the costs of transition.

Question 18: Should there be any exemptions from such a ban?

Exemptions should be kept to an absolute minimum – as set out above numerous alternatives to peat exist and it is difficult to envisage many scenarios where there is no option but to use peat. The default legal position should be that horticultural use of peat is banned, with any exemptions to this being tightly defined and time limited.

A clear ecological purpose (such as growing peatland plants in a laboratory for reasons of conservation or scientific research) should be established for any exemption. Peat used under listed exemptions should be controlled and monitored through a strict licensing system administered by Defra.

Question 19: For potted plants and shrubs, what should be the maximum quantity of peat that should be exempt from a sales ban?

No quantity of peat should be exempted from the ban. Exemptions, aside from those required for tightly defined ecological purposes, will lead to loopholes and will undermine the ban.

Transitional arrangements could be built into ban legislation for shrubs and trees that were grown from seedlings before 2023, to allow time for these to mature to retail or commercial sale requirements. These transitional arrangements would also need to be regulated under a licence system.

Point of sale bag charge for the purchase of any growing media bag containing peat: Questions 20-26

The questions in this section are largely aimed at retailers. However, the environmental groups we represent have engaged length on this topic and we would make the following observations:

¹² See <https://www.salixrw.com/peat-free-statement/>

- As with mandatory reporting, a charge could have some benefit as a transitory measure to help the industry move away from peat ahead of full implementation of a ban. However, a stand-alone measure without a peat ban, a charge will have a much-reduced effect.
- A standing charge on peat products would not put pressure on the industry to end peat use, as they could just pass the price increase onto consumers. This would not solve the problem of peat use; indeed, it could legitimise it in the long term.
- The burden and responsibility of products that damage the environment should be placed on manufacturers and retailers, and not upon consumers who cannot be expected to know the environmental impacts of all the products they buy. This is especially the case with peat products, where public awareness of the environmental damage caused by peat extraction is low, and the ecological and environmental ramifications are severe.

Call for evidence

Question 26: Should we change the voluntary target for ending the use of peat and peat containing products to 2028 for the professional sector in England?

While the target for the professional sector should be brought forward from 2030, a voluntary target for 2028 is too little, too late. This timescale and voluntary approach reflect neither the urgency of tackling the climate and nature emergencies nor the Government's commitments to reach net zero and halt the loss of biodiversity.

A legally-binding ban for the professional sector should be implemented as a matter of urgency, in line with the CCC's recommendation to end horticultural peat use by 2023. The IUCN's Demonstrating Success report on horticulture¹³ shows clearly, through case studies of successful peat-free growers, that an end to professional peat use is achievable within a shorter timeframe given the necessary knowledge-sharing and investment

Although we have not yet reached the 2030 date for the voluntary end to peat in professional horticulture, experience of progress in retail peat clearly shows that the voluntary target approach has not achieved the wholesale shift that's required across the industry. The reasons for this are the same as those that caused the failure of the 2011-2020 voluntary end to peat in amateur horticulture – a fear amongst leading retailers of first mover disadvantage. A legal ban would remove this commercial hesitancy and compel the professional sector to move as one.

In addition to moving faster on professional horticulture, the Government should look to deliver further on the Climate Change Committee recommendations on peat use by:

- Extending the ban to peat use in food production, notably in mushroom growing.
- Acting to end the commercial extraction, import and export of peat for any use.
- Committing to full restoration of UK peatlands.

¹³ <https://www.iucn-uk-peatlandprogramme.org/resources/restoration-practice/demonstrating-success>

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This response is not confidential.

This response is supported by the following Link members:

British Mountaineering Council
Buglife
Butterfly Conservation
Bumblebee Conservation Trust
British Ecological Society
Chartered Institute of Ecology and Environmental Management
CPRE, the countryside charity
Friends of the Earth (England, Wales and Northern Ireland)
Greenpeace UK
Open Spaces Society
People's Trust for Endangered Species
Plantlife
The Rivers Trust

17.03.22