



PEAT-FREE PARTNERSHIP

A Partnership Project working to protect peatlands through sustainable horticulture

Peat-Free Team hosted by Plantlife

Response to 'Tackling the Nature Emergency - Consultation on Scotland's Strategic Framework for Biodiversity'

Chapter 2 – Objective 1: Accelerate Restoration and Regeneration

Question 2a: Have we captured the key actions needed to deliver the objective: accelerate restoration and regeneration?

No. The Peat-Free Partnership supports a ban on peat sales; however, the proposed actions only reference a ban on retail peat sales once, and this singular mention remains extremely vague. The parameters for 'continuing on-going work' are not explained, suggesting that there is still no date set for the ban on retail sales to be instated and no plan to end peat use in professional horticulture. This indicates a lack of urgency on the behalf of the Scottish Government, which is alarming considering the consultation took place early in 2023. The results of the previous consultation should be taken as an opportunity to carry the momentum forward and put concrete goals in place for the implementation of legislation against peat sales in Scotland, using the forthcoming Natural Environment Bill as the mechanism for this.

Failure to act against this issue negates the actions being taken to deliver the objective: 'accelerate restoration and regeneration' due to the drastic effects of peat extraction on the part of the horticulture industry. Furthermore, we call for a ban on the extraction of peat for horticultural purposes, to strengthen the effects of a ban on peat sales. We acknowledge that it may be preferable to the government for certain stakeholders to hold extraction licenses whilst moving towards a complete ban on horticultural peat, however we urge the Scottish Government to phase out the use and extension of these licenses as soon as possible.

Question 2b: Are the key actions, to support the objective: accelerate restoration and regeneration, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

No. A lack of legislation can only negatively affect biodiversity. The Scottish Wildlife Trust stated earlier this year that over 20% of Scotland's land is peatland, and over 80% of that peatland is degraded. The continued degradation of peatlands through the extraction of peat only impedes the measures being taken to end the loss of biodiversity by 2030. Moreover, to persist with the extraction of peat would counteract any effects of the £250 million commitment made by the Scottish Government to restore peatlands by 2030. To proceed with this investment without taking legislative action to ban peat extraction would therefore be counterproductive to ending biodiversity loss.

A ban on peat sales and on the extraction of peat for horticulture **well before 2030** would not only protect the species within those habitats but would also prevent the further release of sequestered carbon dioxide stored in peat.

Chapter 7 – Objective 6: Take Action on the Indirect Drivers of Biodiversity Loss

Question 2p: Have we captured the key actions needed to deliver the objective: take action on the indirect drivers of biodiversity loss?

No. Whilst the target to ‘make space for nature’ by encouraging people to use peat-free gardening products is helpful, it is not enough to fulfil the objective to ‘take action on the indirect drivers of biodiversity loss’. The Peat-Free Partnership agrees that it is vital that citizens recognise the impacts of peat extraction for horticulture, however we believe that moving towards peat-free products should not be viewed as a choice for the consumer. Voluntary measures by the horticultural industry and public awareness campaigns in recent decades have not been effective in phasing out peat use. Effective action against this issue would involve the introduction of a ban on retail peat sales and the extraction of peat for horticulture, coupled with campaigns which seek to educate the public on the reasons for the ban and what alternatives are available.

Question 2q: Are the key actions, to support the objective: take action on the indirect drivers of biodiversity loss, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

No. As it stands, the key actions outlined for this objective make the move towards peat-free products a choice to be made by the consumer. This is not sufficient to end the loss of biodiversity by 2030. The Scottish Government needs to take legislative action to ban the sale of peat as soon as possible to mitigate further damage caused by peat extraction.

Section 6 – Statutory Targets for Nature Restoration

Question 6a: Do you agree with this approach to placing targets on a statutory footing?

Yes. Placing targets on a statutory footing will prevent progress from backtracking. It will also provide SMART, concrete goals for the government to work towards.

Question 6b: Do you agree with the criteria set out for the selection of targets?

Yes.

Question 6e: Do you have any other comments on the list of potential target topics?

We believe that it would be beneficial to include a ban on peat sales in the list of potential target topics, as the Scottish Government is already working towards this following the early 2023 peat consultation. This is an excellent opportunity to put SMART goals in place to work towards the ban and implement a specific time frame for retail and professional bans on peat sales. We also believe that it is pertinent for a ban on horticultural peat to be included in the forthcoming Natural Environment Bill.

Question 6g: Do you agree statutory targets should align with the 2030 and 2045 timescales set out in the Strategy?

Yes. We agree that targets should align with existing timescales. However, we would like to highlight that any alignment with the 2030/2045 timescales of the Strategy must not compromise the need for immediate and effective action to introduce legislation to prohibit the extraction and use of peat for the horticulture sector. The removal of peat from horticulture is urgent, has been recognised for decades, and voluntary measures have been proven inadequate. Therefore, the implementation of a statutory measure to prohibit the use of peat in horticulture must be achieved well before 2030.