

Peat consultation – briefing DRAFT, February 2022

Introduction

This briefing summarises the [government's consultation on ending the sale of peat](#) and provides a guide to responding by the *18 March 2022 closing date*. The briefing sets out:

- what is good and what is weak about the government's proposals (pages 3-4).
- how the trade continues its resistance to change (pages 1, and 6).
- why ministers must not be distracted by further foot dragging by interests that have made vast profits from peat, a product the government now accepts the public do not need to garden and grow successfully.
- Some draft ways to respond to the government's consultation (pages 8-13).

Summary

Ending peat use is long overdue. Peat is best left in ground where healthy peatlands support nature, store carbon, reduce flood risk, and purify and provide plentiful water. The government missed its own target, set in 2011, to end the sale of peat by 2020, and its 2030 target date to end peat use by professional growers is also not on track. The peat and horticulture trade has resisted change for decades and it still wants to dictate the terms of meeting new targets to end peat use once and for all. The government was naïve to think it could rely on a sector making vast profits from peat to hit voluntary target dates to end peat use. It now risks rewarding the sector's decades of failure to give the public genuine choice to grow and garden without peat.

The prospect of a much-needed end to peat sales presents a real opportunity to raise and boost people's knowledge and confidence in growing as part of action for nature, climate, health and exercise and recreation. Moving away from peat is also an opportunity to revolutionise waste streams, create local supply chains with new skills and employment supporting local economies by collecting and processing garden waste and kitchen scraps and selling it back to households as low-cost quality compost.

Resistance to change

Peat use is a relatively recent habit when people have grown and gardened successfully without it for many years before it's use became so easily available and commercialised. Despite having more than a decade to act the horticulture trade remains resistant to change, and is dragging down national aims and people's desire to grow without peat.¹

Even now many in the trade claim using peat is essential when it is perfectly possible to garden and grow successfully without peat, as the government has also now recognised. Learning to grow without peat would mean the public being more and better informed and gaining more skills, knowledge, and confidence. But the trade may fear a better informed and skilled public as that could see people move away from thinking they must use peat or risk seeds and plants dying, thinking which would suit a sector that is used to profiting from selling peat to an unsuspecting public.

¹ YouGov public polling, 2021, for Wildlife and Countryside Link
https://docs.cdn.yougov.com/ibda0309lw/WCL_Results_210125.pdf

Despite public concern about peatlands and desire to switch to using non-peat growing media, people are largely unaware of what they are buying. The RHS found that 57% of gardeners do not know what is in the compost they buy.² The general lack of public understanding is also illustrated by a retailer cited in a report for the sector: “Consumer awareness of what is in a bag is extremely low. It is a low awareness category”.

A full year after the government’s 2020 phase out date had been missed, a survey by The Wildlife Trusts found that only one of 20 leading retailers planned to stop selling peat that year.³ A November 2021 poll by the trade journal Horticulture Week found that 76% of professionals in the sector “want to carry on using peat”. The journal even reported some respondents predicting the end of gardening in the UK: “gardening and UK growing are doomed if the UK diverges from the rest of the world and bans peat.”⁴

Other wild claims from the sector about ending peat use include the suggestion that “The danger for the environment... is that it will make gardening less accessible for the new and inexperienced gardener. That will have the effect of them stopping gardening to find an easier hobby. The result is that gardens will be paved over...”⁵

Reduced peat sales

There has been some reduction in peat sales, but the pace of reduction is so slow. Official trade data for peat use shows that if pace of reducing peat use continued at level achieved by 2019 peat would still be being stacked high and sold cheap in 2040, unless the government requires the sector to halt sales, and to start offering genuine choice.

The sector’s resistance to change is also shown by the even slower pace of reducing peat use by professional horticulturalists and growers. From 2014 to 2019 there was a “marginal reduction” of 1.0% in peat used by the professionals from 63.9% to 62.9%. Left to its own devices, at the pace of reduction by 2019 it would take more than sixty years for professionals to stop using peat. The government’s target date for this was 2030 and the current consultation proposes 2028 as a new end date, which is too late.

Rewarding failure

² Half of gardeners unaware of what’s in their shop-bought compost, finds RHS, 2021, RHS Gardening
[https://www.rhs.org.uk/press/releases/Half-of-gardeners-unaware-of-what%E2%80%99s-in-their-shop#:~:text=More%20than%20half%20of%20gardeners,Society%20\(RHS\)%20has%20found.&text=A%20third%20\(37%25\)%20also,peat%20free%20bagged%20potting%20compost](https://www.rhs.org.uk/press/releases/Half-of-gardeners-unaware-of-what%E2%80%99s-in-their-shop#:~:text=More%20than%20half%20of%20gardeners,Society%20(RHS)%20has%20found.&text=A%20third%20(37%25)%20also,peat%20free%20bagged%20potting%20compost)

³ Survey of top retailers: only one of 20 says they will eliminate peat this year, April 2021, The Wildlife Trusts
<https://www.wildlifetrusts.org/news/survey-top-retailers-only-one-20-says-they-will-eliminate-peat-year>

⁴ What’s peat’s future after 76% vote to keep using it? 25 November 2021, Horticulture Week
<https://www.hortweek.com/whats-peats-future-76-vote-keep-using-it/ornamentals/article/1734129>

⁵Also: BBC Gardeners’ World magazine, 19 November 2020

The sector now wants even more time and claims that gardening will end without peat, and that the UK will lose out if it ends peat use and other nations do not. The trade wants to act at its own pace. The government's proposed 2028 end date for professional use would see peat being dug from UK peatlands and imported from the world's threatened peatlands for another 17 years after it set its original 2020 phase out date in 2011. Change is needed within three years and giving the professional sector until 2025 to end its peat use is realistic and reasonable given the opportunities the sector has had. To avoid rewarding failure Ministers must:

- stand firm and not give in to the sector's demands for more time
- end peat sales to the public by 2023-24
- end peat use by professional growers soon after – by 2025 as 2028 is too late.

Ending peat sales and use is a replete with opportunities to:

- boost public skills, knowledge and confidence in home and community composting and in gardening without peat.
- take waste out of the waste streams and turn them into a useful resource which can support new employment and skills in newly created local supply chains by selling garden waste and food scraps back to people as low-cost growing media.
- properly protect UK peatlands (and those in Ireland and overseas) so that they can play a full role in restoring nature, storing carbon, providing pure water and helping to reduce flood risk.

Ending peat sales - what is good about the government's proposals?

Strong / good aspects of the government's proposals are that they:

- Recognise **the importance of peatlands** whether here in the UK, in Ireland or elsewhere) and to ending the destructive practice of extracting peat, transporting it across the UK (or importing it) to get very limited and short-term benefit in gardens, window boxes and patio pots.
- Recognise that **peat use is not needed to grow and garden successfully**, and that most people are unwittingly buying peat when they do not need to.
- Declare an **aim to end the sale of peat to the public soon** – “We aim to end the retail sale of peat and peat containing products in England and Wales by the end of this Parliament and by 2028 in the professional horticulture sector.”⁶ But 2028 is too late – 2025 is entirely feasible.
- Intend to deal with peat whether it comes from the UK or from overseas: “proposing a ban on the sale of peat and peat containing products (products that

⁶ Ending the retail sale of peat in horticulture in England and Wales, page 9
https://consult.defra.gov.uk/soils-and-peatlands/endingtheretailsaleofpeatinhorticulture/supporting_documents/Consultation%20Ending%20the%20retail%20sale%20of%20peat%20in%20horticulture%20in%20England%20and%20Wales.pdf

wholly or partially include peat) in the retail sector. **Any ban will apply to domestic and imported peat, alike...**⁷ Peat imports should end.

- See the government admit that “The environmental concerns around peat use in horticulture have been ongoing since the 1990s and there is widespread frustration that the issue has yet to be resolved. We have concluded that **the voluntary approach has not delivered.**”⁸ We agree.
- Consider using a point-of-sale (POS) charge on bags of peat – “Peat-free growing media is often more expensive than growing media containing peat, and so **there is currently no financial incentive for consumers to choose peat-free growing media.** This measure is aimed at overcoming the price differential by increasing the price of peat-based growing media.”⁹ A levy would help if it is high enough.
- Recognise that notwithstanding good effort by some in the trade, that “there **are still many retailers for whom this issue is not a priority.**”¹⁰ Too many are in denial.

Growing without peat

There is plenty of help at hand to gain confidence from growing without peat including:

Garden Organic on *Peat-free growing*: <https://www.gardenorganic.org.uk/peat-free-growing>

National Trust on *Going peat-free*: <https://www.nationaltrust.org.uk/features/going-peat-free>

The RHS on *Peat free growing media*: <https://www.rhs.org.uk/soil-composts-mulches/peat-free>

Earth friendly gardener on *How to succeed in your garden with modern, reliable and nature-friendly peat-free sowing and potting compost*:

<https://earthfriendlygardener.net/2014/10/11/peatfree-compost-gardening-seed-potting-multipurpose-peat-allotment-ericaceous-propagation-fungi-organic/>

Almanac Soil Preparation: How Do You Prepare Garden Soil for Planting?

<https://www.almanac.com/preparing-soil-planting#>

YouTube video by Rosy Hardy of Hardy's Cottage Garden plant nursery, winner of 24 RHS Chelsea Gold Medals, growing herbaceous perennials, grasses, ferns, and shrubs:

https://www.youtube.com/watch?v=q7GH-r_w2uI

⁷ Ending the retail sale of peat in horticulture in England and Wales, page 10

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Ending the retail sale of peat in horticulture in England and Wales, page 14

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Ending the retail sale of peat in horticulture in England and Wales, page 14

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Ending the retail sale of peat in horticulture in England and Wales, page 13

What is weak / vague or missing in the government's proposals?

The government's proposals are susceptible to the trade dictating the terms of its involvement including the dates to end peat sales.

- The sector has already signalled its intention to decide what it is willing to do and when, all of which seems like **more of the same delay and failure to act** properly since 2011 resulting in the government's voluntary phase out dates being missed.
- In response to the government's consultation proposals, and the November 2021 poll of professionals by Horticulture Week, the trade is pushing what it regards as **"realistic and achievable peat removal targets"** which, in turn, it says are **"entirely dependent on having the necessary supply of alternative materials"**.¹¹

That is despite that fact that peat is not needed in many of its current uses. It is **not the case that all current peat uses have to be replaced, like-for-like, with a different material**. Most plants will grow perfectly well in existing garden soil and simply need a good water and feed. That alone shows the scope to take out much peat use without needing to replace it all with another material.

- The government has provided supportive quotes for the trade's press releases but **ministers have not publicly challenged the sector's misleading claims** such as about peat use being essential (which it is not) and gardening in the UK ending unless peat use continues.
- Given how the trade has continued to profit from peat despite breaching the government's targets and undermining other aims, **the trade exploits government weakness and is used to getting its way**, such as letting the sector regulate itself at its own pace, despite the government's admission that its reliance on voluntary targets "has not delivered".
- The government's proposals (see page 10) **might leave scope for more harm to peatlands** because "Our proposed changes will not affect current licences for peat extraction – existing licenses in respect of this specific area will continue to apply. However, the proposed measures will affect the market for peat and peat containing products by inevitably causing the demand for peat to diminish."

Ending peat sales can reduce demand but **existing peat extraction sites could continue to be dug out to create a very different type of landscape and habitat without the same properties as healthy peatlands**, perpetuating harm and undermining of government aims for nature, climate, water and flooding.

- It is entirely feasible to end both public and professional use of peat within a short time and **it is not clear why the government has ignored the Climate Change**

¹¹ What's peat's future after 76% vote to keep using it? 25 November 2021, Horticulture Week
<https://www.hortweek.com/whats-peats-future-76-vote-keep-using-it/ornamentals/article/1734129>

Committee's which called for all peat use to end by 2023.¹² Instead, the government is proposing 2024 as the end date for public sales (should be 2023) and 2028 for professionals to stop using peat (should be 2025 at the very latest).

¹² Land use policies for a net zero UK, 2020, UK Climate Change Committee
<https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

Background information

1. Progress on ending peat use

The government says: “The UK Government set voluntary targets in 2011, aiming for a peat-free amateur sector by 2020 and professional sector by 2030 in England. **Some significant progress was made**, with the investment manufacturers and retailers made into peat alternatives starting to feed into the market. While this **progress by the industry is promising, further Government action is needed to ensure the entire industry continues to make progress** in switching to peat alternatives, thus ending the use of peat and peat containing products.”¹³

“The horticulture industry is making a conscious effort to transition to peat alternatives and is working closely with government to do so. However, progress in industry transitioning to peat-free alternatives **has been slow**.”¹⁴

“Industry stakeholders have this year created a taskforce focused on **ending the use of peat as early as 2025 and no later than the end of 2028**.”¹⁵

Friends of the Earth says:

- Suggestions of “some significant progress” cannot hide the **failure of the government’s faith in voluntary action** by a sector profiting from selling peat.
- In 2010 the government applauded the sector’s progress on reducing peat when Environment Minister Richard Benyon said: **“The horticultural industry has made real progress in reducing peat use**, but I want to see peat eliminated from the amateur gardener market by 2020. We need to go further if we are to protect our natural environment and reduce greenhouse gas emissions.”
- The weakness of voluntary measures and paucity of action by the sector is summed up in a report for the sector itself, which states that **“there has been little compulsion in reality and the transition has been relatively slow**.”¹⁶
- Even now leading representatives of the peat and horticulture sector are making **groundless claims that peat use is essential** and that, somehow, people cannot garden or grow successfully without it.
- Such claims show **a sector that is resistant to change**, and the government should call out such misleading claims.

¹³ Ending the retail sale of peat in horticulture in England and Wales - Consultation Q&A https://consult.defra.gov.uk/soils-and-peatlands/endingtheretailsaleofpeatinhorticulture/supporting_documents/Ending%20the%20retail%20sale%20of%20peat%20in%20horticulture%20in%20England%20and%20Wales%20Consultation%20Question%20and%20Answer%20document.pdf

¹⁴ Ending the retail sale of peat in horticulture in England and Wales

¹⁵ Ending the retail sale of peat in horticulture in England and Wales, page 7

¹⁶ Bek, D., Lennartsson Turner, M., Lanari, N., Conroy, J., & Evans, A. (2020). Transitioning to peat free horticulture in the UK: an assessment of policy, progress, opportunities and barriers. Report for the Horticultural Trades Association (HTA) and the UK Growing Media Association (GMA) – Page 54

- **The sector now wants to be left to act by 2028** – eighteen years later than the government's original voluntary target was set.
- Unless the government is firm and ends all peat sales by 2024 at the very latest, it **risks giving in to an errant sector that wants to continue to profit** from the ongoing degradation of peatlands undermining government aims to restore nature, store carbon, and cut flood risk.
- Ministers also risk **rewarding the sector for its failures** and to respect the government targets despite having more than a decade to act.
- Ministers must **not let the sector dictate the terms of its involvement and phase out dates**.

2. Is peat use necessary?

The government says: “**Retail growing media is frequently misused by consumers**, for example being used as a soil improver rather than a medium in which to propagate plants. **Dedicated soil improvers that do not contain peat are widely available and are much more effective.**”¹⁷

Friends of the Earth says:

- Exactly. **People are being badly served by a trade making huge profits from selling peat they do not really need** to be able to grow and garden successfully.
- The sector (and the government) **should help people to grow successfully in ways which do not harm peatlands** for example by improving home composting and knowing how to grow with peat free growing media.

3. Some peat use is needed

The government says: “...**some peat will inevitably be required** for certain specialised uses...”

Friends of the Earth says:

- **That should not distract from ending the widespread commercial sale of peat** in bags and in pre-potted plants by the garden and DIY centre trade.
- The retailing of peat to the public has **nothing to do with the use of peat by a few specialist plant growers and scientific institutions.**
- Bodies such as the Royal Botanic Gardens Kew may need to **use some peat to grow and help save some species** including to be able to return plants to the wild.
- Whisky production is often cited as using peat although not all distillers do and many that did have ceased. Any use is no reason to delay ending sales to public.

4. Insufficient alternatives to peat

The government says: “...there are currently **insufficient amounts of suitable material for both amateur and professional sectors to transition fully and sustainably to peat-free** growing media...”

Friends of the Earth says:

- This further **highlights the sector’s foot-dragging** to end its own peat use and to give people genuine choice to grow and garden without peat. The IUCN has shown how it is **feasible for the horticulture sector to use its own use** of peat.¹⁸
- There is huge scope to turn the **large amounts of garden clippings and food scraps into locally processed peat free growing media** for sale at low prices.

¹⁷ Ending the retail sale of peat in horticulture in England and Wales, page 7

¹⁸ Demonstrating success – peat free horticulture, IUCN
<https://www.iucn-uk-peatlandprogramme.org/resources/restoration-practice/demonstrating-success>

- This would help **reshape waste streams and supply chains which support local skills and employment**, instead of the UK transporting peat from parts of the UK (or importing it from Ireland, or from Canada, the Baltic States or Asia).
- There are also **ways to grow and garden without peat by home composting and community composting, and by boosting people's confidence in basic skills**.
- Indeed, the 2020 study for the horticulture trade states: **"Options for development of growing systems that are less reliant on the use of ready formulated growing media may also be appropriate for domestic garden situations and research and information to help gardeners to, for example, make their own growing media mixes may offer opportunities to take the sustainability of gardening activities to an even higher level."**¹⁹

"In conclusion, although there were problems with the performance of the 'first generation' of peat-free media in the 1990's, the **results from the comprehensive body experimental work undertaken on peat alternatives since then, provide clear evidence that these problems have now been resolved**"²⁰ and **"...the new generation of alternatives are able to match, or even exceed, the performance of traditional peat-based products."**²¹

5. Researching peat alternatives

The government says: **"Defra and industry members have invested over £1 million** in a project to provide the necessary applied science to help underpin the development and management of alternative growing media."

Friends of the Earth says:

- It makes sense to **use some public funds to research peat alternatives** given that public funds are wasted if peat loss worsens nature's decline, climate change, flood risk and reduced water quality.
- But **how much is the trade itself putting in given the profits it makes** – and has made for decades - from ongoing peat sales?
- It is notable that the Coventry University report for the trade states that "...being at the forefront of global efforts to develop more responsible sourcing of growing media could well **stand the UK industry in good stead**, creating opportunities for sharing intellectual property and expertise"²² and "the performance of the new generation of peat-free growing media indicates that **quality issues should no longer be limiting the transition.**"²³

¹⁹ Bek, D., Lennartsson Turner, M., Lanari, N., Conroy, J., & Evans, A. (2020) - Page 39

²⁰ Bek, D., Lennartsson Turner, M., Lanari, N., Conroy, J., & Evans, A. (2020) - Page 47

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Bek, D., Lennartsson Turner, M., Lanari, N., Conroy, J., & Evans, A. (2020) - Page 53

²²

Bek, D., Lennartsson Turner, M., Lanari, N., Conroy, J., & Evans, A. (2020) - Page 55

²³

Bek, D., Lennartsson Turner, M., Lanari, N., Conroy, J., & Evans, A. (2020) - Page 57

6. Peatlands and storing carbon

The government says: “**Peatlands are an iconic feature of our landscapes. They are the UK’s largest stores of carbon.**”²⁴ The world’s peatlands are essential to curbing climate change. Although they cover just 3-4% of the Earth’s land surface area, the UNEP has assessed peatland wetlands as storing twice as much carbon as global forests:

“Peatlands are a type of wetland that occurs in almost every country on the globe. **They store vast amounts of carbon - twice as much carbon as all the world’s forests.** By conserving, protecting and restoring peatlands globally, we can reduce emissions and revive an essential ecosystem that provides many services, for people, the planet and the climate—including their vital role as a natural carbon sink.”²⁵

Peatlands store around 550 Gtonnes Carbon = 550 billion tonnes carbon.²⁶ Those figures have been revised since then to over 600 Gigatonnes Carbon.²⁷ The carbon stock of the world’s forests is put at 861 gigatons of carbon although that includes all peat soils beneath forests down to about a metre.²⁸ Live biomass of forests is 42 percent of 861 gigatonnes = 361 Gigatonnes of Carbon. That includes biomass beneath ground such as trees’ roots, so the above ground forest biomass is lower by half again.

Responding to the government’s consultation – ideas for replies to key questions

Page 13 onward

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?

The 2020 target date was missed, and the government was warned as early as 2015 that this would likely be the case. The government has now accepted that “the voluntary approach has not delivered.” The Climate Change Committee has also recommended 2023 as the phase out date.

²⁴ Ending the retail sale of peat in horticulture in England and Wales, page 7

²⁵ UNEP, 2019 Peatlands store twice as much carbon as all the world’s forests
<https://www.unep.org/news-and-stories/story/peatlands-store-twice-much-carbon-all-worlds-forests>

²⁶ The Global Peatland CO2 Picture - Peatland status and emissions in all countries of the world
https://unfccc.int/files/kyoto_protocol/application/pdf/draftpeatlandco2report.pdf

²⁷ Peatlands and climate change, IUCN, 2021
<https://www.iucn.org/resources/issues-briefs/peatlands-and-climate-change>

²⁸ Forest Carbon Stocks, World Resources Institute, Global Forest Review
<https://research.wri.org/gfr/biodiversity-ecological-services-indicators/forest-carbon-stocks>

The failure of the horticultural trade to meet the government own original target date of 2020, and to guarantee that any later dates would be met without question, results in a lack of confidence in the sector's willingness to act at the scale and pace required. That should also be seen in the content of ongoing extraordinarily wild and ill-informed claims from across parts of the horticulture sector still opposed to ending peat use.

The government has, seemingly, failed to challenge claims from various players in the horticulture trade, such as gardening in the UK being “doomed” if peat use ends (as reported by Horticulture Week), or people paving over their gardens if they cannot use peat (as reported by Gardener's World magazine).

The horticulture trade and government should note that substantial amounts of green space in the form of domestic front gardens have been - and are the process of being - lost in streets and neighbourhoods across the UK, as householders decide to pave over of front gardens due to the relaxation of planning rules.

That considerable loss of very local green space where people live directly undermines aims for nature, flood risk, urban heat and carbon storage, as well as meaning less space for horticultural products and practices, and people with the potential to learn new skills to care for their properties.

The government has no valid reason to delay any further, and doing so would simply encourage more delay by the trade which talks of ending peat use one day and pushes excuses for more peat use the next.

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?

Given that it is not hard to garden and grow without peat and that there is huge scope to help people gain confidence, gain new skills and find ways to grow successfully in other ways, there should be no extension to dates.

If anything, and given past failures, the case exists for the government to bring forward the proposed date as part of expediting action, making up for the delays to date, and to send very strong signals of the role of improved knowledge and skills in basic gardening and maintenance. Ending peat use by 2023 would be in keeping with the Climate Change Committee's advice.

Question 8: Do you agree that retailers of horticultural peat should have access to information from their manufacturers about the amount of peat in the growing media bags they sell?

Yes, this makes sense because it can help retailers to make better decisions about their product lines.

Question 9: Would you be able to assess the amount of peat in the different sizes of growing media that you sell? [If yes] How will you assess this?

This information should be supplied clearly and accurately by the supplier and be subject to stringent legal requirements on the reporting of ingredients, not dissimilar to that used for food products.

Question 10: Should small and medium enterprises be given more time to adopt this measure? [If yes] How much more time should we give small and medium enterprises to adopt this measure?

No. The entire sector has the responsibilities to play in restoring nature, reducing climate change, averting flood risk and helping customers to play their own role as well informed consumers. Retailers and wholesalers are in the same 'ecosystem' and should work together such that these and other aims are delivered by a sector that has been sluggish, to say the least, in the past. There is no reason for any SME retailer to be disadvantaged if the sector as a whole raises its past poor performance and, if anything, the responsibility lies with the wholesaler supplying products to small and medium-sized businesses.

Question 11: How feasible will it be for retailers of products that contain peat, for example potted plants, to obtain accurate information on how much peat is used within the potted plants?

This is entirely feasible given the data producers and suppliers have on the make up of their products and if the government places full responsibility on producers and any of their intermediary processors fully responsible for clearly stating the peat content in volume and percentage terms of all products. This would not be difficult to achieve: growers know what proportion of peat they use in their growing media.

Question 12: Should some retailers be exempt from reporting if they are selling less than a particular amount of peat per year? [If answered 'yes'] What amount should the threshold be in litres?

No, there is no case for exemptions. All retailers should be treated equally as they are all part of the same ecosystem which has an interest in the new growing media system working. Allowing exemptions is a recipe for leakage and the black market and rewards past failure and even present resistance to change.

Question 13: Do you agree that this measure would encourage the horticulture industry to reduce their use of peat and peat containing products?

On its own, this measure is highly unlikely to achieve the proposed end to peat use – it is a continuation of the failed voluntary approach to ending peat use. As a measure alongside a legislative ban on peat use, auditing peat use is a vital measure to track progress across the gardening sector, and to enable all businesses (across retail, manufacturing and growing) to be aware of their peat use and to monitor their own progress towards removing peat from their business.

Question 14: Do you agree that this measure would help to raise awareness of issues around the use of horticultural peat?

Yes. Mandatory reporting will raise awareness at both individual business and industry levels, as well as providing information for increasing awareness among consumers and the media. It will also identify and raise awareness of success stories and progress, as well as issues and problems that may need further attention; and it will help to inform both consumers and retailers about their choices of supplier at retail and trade levels respectively.

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

Yes.

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

Yes, because it is already feasible to end peat sales and use before 2024. Depending on the government's willingness to right past wrongs and failings by making space in the parliamentary process, the government can end the peat scandal in short order. Delay would confirm the government's willingness to give in to the horticulture trade's pushback which is backed by other vested interests also seeking to continue peat use.

The trade suggests it wants "realistic and achievable peat removal targets" which is code for delay and engagement on its own terms, despite the government giving the sector over a decade to act.

The trade also claims that ending peat use is "entirely dependent on having the necessary supply of alternative materials" yet this ignores that much peat use is entirely unnecessary, as the government has now recognised, and that much demand for peat results from a widespread lack of knowledge and skills among the buying public, and peat not only being a byword for compost, growing media and soil improver but often being the only product clearly available at the point of purchase.

It is misleading of the sector to suggest that all current uses of peat must be automatically replaced with a substitute when, with better information and a build up of skills and confidence, most people, can grow many plants perfectly well in existing garden soil and simply need a good water and feed. That alone shows the scope to take out some peat use without needing to replace it with another material.

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?

Other parts of the supply chain may well experience a change in business but investing in local supply chains of locally derived compostable materials can create new and more rewarding employment and skills, less dependent of harmful and lengthy supply chains which perpetuate harm.

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

We accept that there is a case for some very limited ongoing uses of peat such as for scientific work including the propagation and growing of plants as part of restoration plans. The Whiskey sector is often referred to when the issue of peat comes up, but many whiskey producers no longer use peat and, in any case, the issue is beyond the scope of the UK government's consultation.

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

Seeking to set quantity exemptions equates to looking for loopholes in what should be a very straightforward across the board end to peat use. There is no scope for such an exemption, allowing for a licensing system for any plants grown from seed immediately before the restrictions.

Question 20: Do you think that the measure to increase the price of growing media containing peat will have an impact on consumer behaviour?

Price sensitivity is likely to be a factor for different people. Most consumers seek more knowledge and skills as gardeners / growers but often lack those along with confidence. Most consumers who do not regard themselves as regular and confident gardeners simply seek an occasional bag of soil in which to grow plants in small pots, window boxes, patio containers or parts of a garden space.

Some community projects and charities use growing media to pot up seedlings for onward sale to others as part of fundraising efforts. In such circumstances, the price change might be noticed but is likely to be marginal.

Faced with a lack of obvious alternatives at the point of the expected purchase, it may be that most consumers go along with the extra cost. The point of sale is also an opportunity around which the government and others can start altering the public's knowledge, skills and confidence around what and how to grow.

If the retailers and the supply chains behind them provide trustworthy products, the focus can shift from the consumer having to decide to the consumer having trust in retailers for good reason.

Question 21: Would this measure encourage the sale of more peat-free alternative growing media?

That is hard to say but it could depend on the availability of alternatives at the time of the sale, and on the quality of the information provided at the point of sale, which is not something the retail sector has been good at, notwithstanding sudden signs of wanting to do so. That has to be seen against the continued resistance to change by many in the sector, which does not instil confidence that the sector has either the foundations or the staying power (beyond short term PR pushes) to rise to the challenge as needed.

The sector *could* be an agent of change but it has yet to show that it can be trusted to play this role consistently and across the entire sector, without proper oversight by others who do not have a vested interest. If the sector is willing to change and transform how it engages with its customers and changes what it says and does, that can be explored but it should not be taken as read that the sector will do the right thing without oversight.

Question 22: What would be an appropriate amount for the point-of-sale charge for a 50L bag of growing media containing peat per litre?

The charge would need to be sufficient to send signals (that things are changing and for good reasons), to create a significant price differential (to make the switch to other growing media worthwhile to the consumer).

There should be a clear price differential which can be tested to ensure that it is significant in altering views and behaviours. Simply equalling the price will not work because of the entrenched behaviour of consumers, who have not been actively informed and engaged with by the sector, will veer toward continued use of peat.

The trade has profited from peat and the costly destruction of peatlands in the UK and elsewhere for many decades. Part of the proposed levy could represent historic profits and the costs to the nation that are having to be expended to repair the harm.

Question 23: Do you have a view on what retailers should do with the levy money raised through the point-of-sale bag charge?

Options for the use of funds derived from the POS charge include ringfencing a portion for use in supporting, educating and informing more people to improve their skills, knowledge and confidence.

Funds could also be used to help establish the transformed local waste streams and local economic activity to turn those back into locally traded composts.

Any funds should be held independently and separately from the trade so that they cannot be used to cross-subsidise any of the trade's own initiatives which, given its past profits from peat and the harm involved, it should finance without further support.

Question 24: Do you believe there should be any exemptions to the point-of-sale charge? [If yes] How should we decide who should be exempt from the measure?

No.

Question 25: In addition to the point-of-sale charge, do you think having mandatory labelling of growing media bags containing peat would have an impact on consumer behaviour?

Labelling could be part of the push to show the public that things are changing and that more and better consumer choice and back up with reliable information and support is now the order of the day.

But labelling is often used to deflect from action. In the case of bagged peat, few people read labels and it is not clear that people will both to read or look anything other than the colours of the bagged product they have seen advertised, or have used before.

Consumer behaviour will change over time with focussed, direct contact and information beyond labels. That requires engagement prior to sale both online and on the premises but before the purchase decision and the payment tills.

It may be that as part of a government-backed burst of public information, a single identity can be used for a year or so to show that an effort is being made once and for all to end the ongoing scandal of peat use. That will require a comprehensive approach, not just labelling.

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

The voluntary target for professional use of peat should be brought forward because the sector is threatening to dictate its own terms of involvement including pursuing its own pace and setting its own timelines. The sector has already profited hugely for missing the government voluntary phase out dates and remains largely resistant to change.

The government's new proposal is to bring forward the original 2030 phase out date to 2028 but this is inadequate. The end of professional peat use should be brought further forward to 2025 to avoid any more resistance to change. The government must be firm or risk repeating previous weaknesses which the trade has exploited, and seems keen to continue doing for as long as it can.

Question 27: (Call for Evidence) When would it be feasible to ban the sale of peat and peat containing products for the professional sector?

This question invites the trade to set its own terms for its involvement, and to dictate what it is prepared to do as opposed to what it is required to do to meet national aims. The Climate Change Committee's advice to end all peat use by 2023 stands in stark comparison. 2028 is too late.

References