

Consultation response: Banning retail sale of peat in horticulture in England & Wales 18th March 2022

Summary

Wales Environment Link (WEL) very much supports and encourages a ban on the retail sale of peat, and is pleased to see this consultation coming forward. However, we are concerned that – whilst we agree that a joined up approach would be best – if the UK Government decides not to go ahead with the proposal, that the Welsh Government would be unable to due to the Market Access Commitment in the Internal Market Act. We urge for clarity on whether Welsh Ministers would be able to do this within Welsh powers.

Peatland is precious and it's essential we keep peat in the ground. The UK Committee on Climate Change has urged for restoration and a ban on peat extraction and sale by 2023. We believe this needs to be invested in and prioritised by all governments, in tandem with action to stop peat-free compost being extracted, traded or sold.

It is estimated that peatland makes up 4.3% of Wales' total land area and many have taken over 8,000 years to form¹. The effects of climate change – i.e. lower rainfall, more frequent and extreme weather events and increased temperatures – are already likely to compound the deterioration of peatland, so we must take any actions we can that will stop further deliberately degrading it. As the Snowdonia Society² puts it: "Well-managed peatlands store more carbon, more reliably and more permanently than any forest anywhere on the planet. They are home to rare and threatened species of plants, insects and birds that cannot live anywhere else."

¹ <https://cdn.cyfoethnaturiol.cymru/media/692172/information-note-peatlands.pdf>

² <https://www.snowdonia-society.org.uk/peat-matter-of-life-and-death/>

They are a self-sustaining, nature-based solution that tackles both the climate and nature crises; we must protect them if we have any hope of protecting nature for future generations.

About you

Question 1: Which of the following do you identify yourself as.

Environmental body/NGO – WEL is a network of environment NGOs in Wales.

Question 2: Which territory/territories do you live in or, if applicable, does your business operate in?

Wales

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 – the voluntary approach hasn't worked, so a mandatory approach is necessary. 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.³ 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.⁴

Ultimately, it shouldn't be up solely up to the retail sector to enact change that will protect our dwindling and precious carbon stores of natural peatland. 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 and is imported. 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

³ <https://friendsoftheearth.uk/nature/governments-2020-peatfree-target-way-track>

⁴ <https://www.wildlifetrusts.org/news/survey-top-retailers-only-one-20-says-they-will-eliminate-peat-year>

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

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, an increase from 2020.

WEL recently wrote to the Welsh Government⁷ to highlight our asks to “1) Increase the scale and pace of investment to protect and restore peatland in line with the recommendations of the UK Committee on Climate Change (UKCCC) and 2) Support a UK ban on the use of peat for horticultural purposes and cease procurement as a matter of urgency, along with an immediate ban on burning upland peat.” The Minister’s response highlighted their National Peatland Action Programme – emphasising to us that it’s contradictory policy to both invest in restoring peatland, whilst at the same time allowing extraction to continue and sales to take place – and this consultation. The Minister does note however that “preventing sales of peat compost is in line with our commitment to be globally responsible”, as part of the Wellbeing of Future Generations Act.

We are concerned that the Internal Market Act’s Market Access Commitment, “that goods or services that meet the standards of one country of the UK can be sold in any other part of UK”⁸, means that Wales couldn’t prevent sales of peat-based compost unless the UK Government acts for both England and Wales. If there are any delays or decisions against mandatory approaches, and Welsh Government wishes to bring forward their own, it doesn’t seem as though they would be able to. We would very much welcome clarity on this from UK and Welsh Ministers.

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?

As soon as possible.

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

⁷ <https://waleslink.org/letter-to-welsh-gov-on-nature-climate-crisis/>

⁸ <https://research.senedd.wales/research-articles/three-senedd-committees-conclude-uk-internal-market-bill-could-undermine-devolution/>

Mandatory reporting of the volume of peat sold (all sellers)

These questions are predominantly aimed at retailers, but we do believe that mandatory reporting – as a standalone measure without a ban on commercial trade of peat – will be ineffective. 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 reasons, a sales ban should 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 industry to move as one.

A ban would also have the backing of the British public. YouGov research carried out for Wildlife and Countryside Link in 2021 revealed that most UK 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.⁹

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

Yes – this is a simple intervention for the UK Government in legislative terms, so could be easily enacted quickly and should be done so before 2024.

Alternatives to peat-based compost are increasingly available to retailers, including coir dust (from coconut husks), green compost wood fibre, bark and wool. Gardeners can also make their own high-quality compost at home – given the Welsh Government’s successful action on embedding kerbside council composting for every household in Wales, amateur gardeners should be more aware of the process already

⁹ https://docs.cdn.yougov.com/ibda0309lw/WCL_Results_210125.pdf

and we'd encourage further public awareness campaigns and easily available home compost bins for those with gardens (and, ideally, shared facilities for buildings of flats with communal spaces).

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

No, we don't think there should be any exemptions. If any are deemed necessary, they should be kept to a minimum and clearly defined; a clear ecological purpose (such as growing peatland plants in a laboratory for reasons of conservation) should be established for any).

Point of sale bag charge for the purchase of any growing media bag containing peat

Again, these questions are aimed at retailers. However, WEL believes that any standing point-of-sale charge is passing on any price increase to consumers, and would not solve any problems of peat use. The responsibility lies with governments and businesses to prevent products being sold that rely upon the destruction of nature. There is public support and strong urgings from environmentalists, but general awareness here is low, so we do not think labelling or levies will provide much disincentive across the board.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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