

# Consultation on Ending the sale of Peat in Scotland

## Response from Stop Climate Chaos Scotland May 2023

### Introduction

[Stop Climate Chaos Scotland](#) (“SCCS”) is a diverse coalition of over 60 civil society organisations in Scotland who campaign together on climate change. Our members include environment, faith and belief groups, international development organisations, trade and student unions and community groups. We believe that the Scottish Government should take bold action to tackle climate change, with Scotland delivering our fair share of action in response to the Paris Agreement and supporting climate justice around the world.

We welcome the opportunity to respond to this consultation on Ending the sale of Peat in Scotland by means of this written submission. As our comments are strategic, this submission takes the form of a written contribution, rather than seeking to answer the specific questions in the online consultation.

### Climate context

Global warming of 1°C has already taken place since the pre-industrial period, almost entirely due to human emissions of greenhouse gases. The impacts are already being felt and further emissions make these increasingly worse. The Paris Agreement aims for countries to work to limit warming to well below 2°C and to aim for 1.5°C above pre-industrial levels.

In August 2021, the IPCC issued the starkest warning yet about human impact on the planet, including more intense heat waves and more extreme weather events, with some changes now inevitable and irreversible<sup>1</sup>. The UN Secretary General branded the findings a “code red for humanity”<sup>2</sup>. The science is now overwhelming: without concerted action we’re headed towards climate catastrophe; with the poorest communities and future generations suffering the most.

“As First Minister of Scotland, I am declaring that there is a climate emergency.  
And Scotland will live up to our responsibility to tackle it.”

Rt. Hon. Nicola Sturgeon MSP, 28 April 2019<sup>3</sup>.

In April 2019, the former First Minister ‘formally’ declared a climate emergency<sup>4</sup>. This language was subsequently central to Scottish Government policy and statements – for instance, the (then) Cabinet Secretary’s statement in May 2019<sup>5</sup> and the 2019-20 Programme for Government<sup>6</sup>. It remains a key element of policy with one of the six chapters within the Scottish Government – Scottish Green Party Shared Policy Programme entitled “Responding to the climate emergency”<sup>7</sup>.

In May 2019, the UK Climate Change Committee (CCC) recommended that Scotland could reach a net zero target for greenhouse gases by 2045 (ahead of the UK, which could meet the same target by

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<sup>1</sup> <https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/>

<sup>2</sup> <https://www.bbc.co.uk/news/science-environment-58130705>

<sup>3</sup> <https://www.ukpol.co.uk/nicola-sturgeon-2019-speech-at-snp-conference/>

<sup>4</sup> <https://www.bbc.co.uk/news/uk-scotland-scotland-politics-48077802>

<sup>5</sup>

<https://www.gov.scot/publications/global-climate-emergency-scotlands-response-climate-change-secretary-roseanna-cunninghams-statement/>

<sup>6</sup> <https://www.gov.scot/news/protecting-scotlands-future/>

<sup>7</sup> <https://www.gov.scot/publications/scottish-government-and-scottish-green-party-shared-policy-programme/>

2050)<sup>8</sup>. The Scottish Government swiftly accepted these recommendations<sup>9</sup> and have now legislated to secure net zero emissions by 2045, with an interim target of a 75% reduction by 2030<sup>10</sup>.

### **Peat and climate change**

Scotland's land is not currently being managed sustainably: it is the biggest source of greenhouse gas emissions. In conventional emissions reporting 'Land Use, Land Use Change and Forestry' (LULUCF) emissions are usually reported as a net figure whereby emissions from the land are cancelled out by removals of carbon in forestry, resulting in LULUCF being reported as a small source of emissions. However, if the emissions from the land are reported separately to the removals, we see that in 2020, LULUCF emissions were 12.4 MtCO<sub>2</sub>e (removals were -11.9 MtCO<sub>2</sub>e). Transport emissions, usually reported as the largest source, are 9.5 MtCO<sub>2</sub>e. It is important to separate out emissions and removals because large sequestration in Dumfries and Galloway does not erase very large emissions from peatlands in the Highlands.

A significant proportion of these land use emissions arise from damaged peatlands and/or the processing and use of peat (which emits GHGs as it dries). In total, around 13% of Scotland's entire territorial emissions are estimated to come from peatlands; this marginally exceeds the emissions sequestered by trees and thus cancels out all of that net greenhouse gas emissions uptake by our forestry<sup>11</sup>. In addition, net emissions can be further significantly reduced by restoring peatlands – thus turning emitting land into that which is removing carbon from the atmosphere (often, over the long term, more effectively than commercial forestry).

Since land, and especially peatlands, is currently such a significant source of emissions, in order to meet Scotland's emission reduction targets, it is vital that changes - including to peat extraction and use - are made. The status quo is not an option.

SCCS, therefore, agrees and supports the consultation paper's statements that:

*“Scotland's peatlands have a critical role to play in responding to the twin crises of the global climate emergency and loss of biodiversity.*

*“In good condition, peatlands are a significant natural carbon store. They hold around 1.8 billion tonnes of carbon, equivalent to around 145 years' worth of Scotland's total net carbon emissions. Covering about a third of our country, peatlands support important ecosystems and biodiversity, improve water quality and reduce flood risk.*

*“However, when degraded or in poor condition, these benefits are lost and peatlands become a net source of carbon emissions. This is why the Scottish Government is dedicated to protecting and restoring our precious peatlands, supporting a Just Transition to Net Zero by 2045.*

*“In 2020 we set out ambitious plans to invest more than £250 million to restore at least 250,000 hectares of degraded peatlands by 2030, scaling up our restoration efforts which have already seen over 30,000 hectares of peatland restored since 2012”.*

### **Peat sales**

SCCS also agrees, supports, and welcomes the statement in the Ministerial Foreword to the consultation paper that:

*“Hand in hand with our efforts to restore peatlands, we must do all we can to protect them. This means we must **consider how to stop using peat**, whether extracted in Scotland or elsewhere” (emphasis added).*

Implicit to this suggestion is that this consultation is not about whether to stop using peat – but how (and when) to stop using peat.

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<sup>8</sup> <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

<sup>9</sup> <https://www.gov.scot/news/climate-change-action-1/>

<sup>10</sup> <https://www.legislation.gov.uk/asp/2019/15/enacted>

<sup>11</sup> <https://www.heraldsotland.com/news/23467301.peatland-emissions-cancel-carbon-removed-forests/> and <https://www.hutton.ac.uk/news/major-review-paves-way-expanding-peatland-restoration>

In the light of the context described above, **SCCS therefore supports the Scottish Government's proposals to phase out the sale (and use) of peat for horticulture. Our only additional comment to this support would be that this phase out should be implemented as speedily as possible, and before the end of 2024 at the latest.**

In relation to the specific consultation questions, SCCS' response to questions 1-19 would be "not appropriate" as the coalition does not engage in the selling, buying or use of peat – and few, if any, of our members do so (indeed, many significant members have clear policies to avoid doing so).

In relation to question 21, SCCS would respond that implementing these proposals would have significant environmental benefits in relation to climate emissions. As outlined above, peatlands are the single most important terrestrial carbon store in the UK and Scotland. Our peatlands store several times more carbon than all of our forests put together. Intact peatlands have an important role to play in improving water quality, acting as flood protection, and storing store water to act as a reserve during dry periods. However, over 80% of our peatlands are degraded meaning they are currently emitting carbon rather than absorbing it, as well as contributing to poor water quality.

It should be noted, however, that ending the demand for peat extraction and facilitating expanded peatland restoration would also result in significant biodiversity benefits.

The above benefits (which, while environmental, are, in fact, benefits to society as a whole as they contribute to meeting the Government's public policy objectives) would outweigh any negative impacts identified by individual businesses in response to question 20. Notwithstanding this overall benefit of the proposals, addressing any such negative impacts will be important – however, this should be done by identifying and promoting alternatives to the use of peat, rather than amending or delaying the ban on sales.

### **Other peat-related issues**

The consultation paper rightly notes:

*"Whilst horticulture is the main end use of extracted peat, we need to consider all uses of peat, and the impact of its extraction on peatlands, in order to develop effective policy".*

Thus, as well as the proposed bans on the sale of peat for horticulture (in phases), there is also a need to address other issues. One key set of policies in this regard would be action to prevent any further significant extraction of peat in Scotland. This should include:

- (a) Prohibition of any future planning consents for peat extraction.
- (b) Review (and revocation) of existing peat extraction consents.
- (c) Review (and revocation) of 'dormant' peat extraction consents.

In these circumstances, it is welcome that the "*National Planning Framework 4 (NPF4) was adopted on 13 February 2023 and contains policies to restrict peat extraction. New commercial peat extraction, including extensions to existing sites, is not supported except in very limited circumstances. NPF4 is now part of the development plan and will be influential in all planning decisions*". However, while the progress via the NPF4 is welcome, it must also be asked: is this sufficient?

For instance, what are the "very limited circumstances" where commercial peat extraction might be permitted, and should more be done to reduce such circumstances? Secondly, is "influential in planning decisions" sufficient, and should the policy be clearer that such permissions are not acceptable?

NPF4 can do, and does, little to address the issue of existing planning consents (both those with ongoing extraction) and those that are "banked" (including historic or 'dormant' consents. The Scottish Government needs to take action to bring existing extraction to an end, and to ensure that existing (inactive) consents are not activated.

In addition, albeit of far lower significance, there may be a need to consider the use of peat as a heating fuel (and associated peat cutting rights and practices), as well as the use of peat in whisky production. These issues should be addressed by reducing demand for peat as a fuel (by means of

improved insulation and alternative heating systems – which may need to be particularly designed to be suitable for the areas where peat is used). In addition, while minimising demand, more attention should be accorded to the management of peatlands where (minimal amounts of) peat are extracted for these purposes – to ensure ongoing wetting and regeneration.

Thus, SCCS acknowledges that, in those sectors that are relatively small users of peat (unlike horticulture), there may be a need for justifiable exemptions. Such sectors with no genuine alternative should be required to minimise peat use, invest in peatland restoration, and sustain a programme of research & development into sustainable alternatives. For the whisky industry, this could include sourcing peat from hand-cut sites, maintaining sphagnum to reduce conservation impact and carbon loss, and halting the use of mechanically cut peat.

Finally, reducing demand for peat and the other protective measures proposed by this consultation and suggested above are welcome and necessary. However, there remains a need to ensure the restoration of our damaged peatlands – to prevent emissions and to, in the long term, increase removals. This needs investment, as well as associated training, skill, etc. The £250m committed, by the Scottish Government, to restore 250,000 hectares of peatlands over a 10-year period to 2030 (as referenced in the Ministerial Foreword) is welcome. However, it should be noted both that this 25,000 per year target has been missed regularly in recent years and that, even this, is insufficient. It is estimated that there is a £560 million gap in the funding needed to restore the UK's degraded peatlands<sup>12</sup> (which suggests a £50-100m shortfall in Scotland, given the distribution of peatlands).

**The inadequate progress in restoration and the necessary increase in ambition and funding for restoration must be addressed alongside these peat sales proposals.**

Stop Climate Chaos Scotland  
May 2023

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<sup>12</sup> <https://www.heraldscotland.com/news/23467301.peatland-emissions-cancel-carbon-removed-forests/>