

ENDING THE SALE OF PEAT IN SCOTLAND

A COMMON WEAL RESPONSE

INTRODUCTION

While Scotland has a great deal of traditional and cultural linkages to the cutting of peat for heating and for growing, the demands of the climate emergency and the ecological damage caused by the mass extraction of peat does mean that the practice must end.

Both the UK and Welsh Governments have announced their intention to ban peat for horticultural use by 2024 so it makes little to no sense for Scotland to not follow their lead in this respect and we support their intention to do so.

However we are concerned that the motivation for this transition has come from an ad hoc political decision rather than a more fundamental and strategic standpoint of ensuring that all goods and services in Scotland must transition to being compliant with Circular Economy principles and a recognition that the extraction of peat does not fit into these principles. This opens the possibility that a badly implemented ban merely shifts the ecological burden onto the replacements for that peat if they themselves are extracted in an unsustainable manner. This should and must be avoided in the final legislation.

QUESTIONNAIRE

YOU OR THE ORGANISATION YOU REPRESENT

1. Which of the following best describes you or the business you represent? (Answering this question will help us to categorise your responses)

- Commercial Grower
- Hobby gardener/private gardener (amateur)
- Growing Media Manufacturer
- Representative of an environmental non-governmental organisation (eNGO)
- Representative of a trade body
- Professional Gardener/Landscaper
- Retail plant sales (selling plants to public)
- Retail growing media sales (selling growing media to public)
- Business to business plant sales
- Business to business growing media sales
- Peat extractor
- Fuel industry representative
- Whisky industry representative
- Other food/drink industry (please specify)
- > Other (please specify)

Please specify if necessary:

Social-Environmental Think Tank (with several avid home gardeners on staff)

2. For those responding on behalf of a business, what does the business sell, produce or grow? Please specify:

N/A

3. How many employees are there in your organisation?

- > Less than 10
- 10-49
- 50-249
- 250+

YOUR USE OF PEAT

4. For what purpose do you use peat?

- Gardening – professional
- Gardening – amateur
- Growing ornamentals – professional
- Growing fruit/vegetables – professional
- Retail sales
- Business to business sales of peat
- Heating - extracted from own/rented land for own use as fuel
- Heating - buy for own use as fuel
- Heating - sell for fuel

Food/drink production processes (please specify)

> Other (please specify)

Please specify if necessary:

Amateur Gardening - though having already transitioned away from peat use.

Interest in broader public policy.

5. Do you consider environmental impacts when using peat?

> Yes

No

If so, please explain your concerns and the measures you take to avoid using peat:

Environmental impacts were the author's chief concern in eliminating peat from their personal use and in campaigning for an immediate ban on the extraction and sale of peat.

6. Is it easy to find alternatives to peat in your local retail outlet?

> Yes, they are readily available and clearly labelled

They are there but I need to scrutinise packaging to find them

I often find it hard to tell what is contained within products

I find it very difficult to find alternatives

I actively seek products containing peat and do not wish to use alternatives

I don't consider what growing media is contained within products

Other (please specify)

Please specify if necessary:

The sector has already largely started making the transition away from peat.

7. When buying growing media, on what do you base your choice?

Performance:

Not Important

Quite important

> Important

Very Important

Cost:

Not Important

Quite important

> Important

Very Important

Consistent product quality:

Not Important

Quite important

Important

> Very Important

Environmental consequences:

Not Important

Quite important

Important

> Very Important

Brand loyalty:

- > Not Important
- Quite important
- Important
- Very Important

**Do you have any other considerations?
Please explain here:**

Transport distance and the precise nature of growing media are also important (especially media derived from household waste which can often be contaminated with plastics etc) but these are hard to scrutinise especially before purchase.

LABELLING OF HORTICULTURAL PRODUCTS

8. Is the information provided on growing media packaging (e.g. printed on bags of compost) or signage sufficient to allow you to make an informed decision regarding:

Informed decision re environment/peat content - the environmental impact of its contents?:

- Yes
- > No
- I don't look at information on packaging/signage

Informed decision re environment/peat content - whether growing media contains peat?:

- > Yes
- No
- I don't look at information on packaging/signage

9. Do you think there should be more information about the growing medium present in potted plants at the point of sale?

- Yes, so I can make an informed decision on what I purchase
- > Yes, so I can avoid buying plants in peat
- I don't wish to know what growing medium the plants I buy are growing in
- The plants I buy display information detailing the growing medium used

Please use this box if you wish to share further views on labelling:

It is very difficult to ascertain what medium potted plants are growing in at the point of sale.

Labelling should include soil content, location of soil extraction (especially if different from location where the plant was grown) and environmental impact of the whole product, including growing medium and packaging.

All products for sale in the Scottish economy should fit Circular Economy principles.

10. If you are a retailer/grower, how difficult would it be to indicate whether peat is present in growing medium within pots?

- > Impossible
- Difficult
- Fairly Easy
- Very Easy

Please provide any further explanation here:

Labelling is generally insufficient for this task.

MOVING AWAY FROM USING PEAT

11(a). Could you or your company stop using peat now?

- > Yes
- No

Please provide any further explanation if required:

It is currently possible to buy peat-free products for gardening as the sector is already mid-transition, however peat products should still be removed and banned.

11(b). If you answered 'no' then why can't you stop using peat now?

- Availability of suitable alternatives
- Cost
- Change in equipment/machinery required
- Storage
- Performance
- Other (please specify)

Please specify if necessary:

N/A

11(c). If not now, when could you feasibly stop using peat?

Please indicate a date (year) when it is likely that you could stop using peat:

A transition is possible now.

12. Are there any plants for which peat is vital for growth and you are not aware of suitable alternatives?

If yes, please provide further information:

I am not aware of any such plants and certainly none which are staple or vital products in the Scottish economy.

13. Is peat necessary for propagation (raising a plant from a seed/bulb/corm/tuber/vegetative cutting)?

Yes (please specify)

- > No

Sometimes (please specify)

Please specify if necessary:

N/A

14. Are there any instances where a % of peat should be permitted within a container-grown plant and what are those instances?

A small percentage should be allowed to account for that which is transferred when replanting propagated material

A percentage should be allowed, for a finite period of time, to facilitate

transition away from peat for certain plants (please specify plant and %)

> **Other (please specify)**

Please explain further if necessary:

Both. A small percentage of peat transferring due to propagation should be tolerated as a contaminant but only for a short and finite period of time (e.g. one generation of plants).

15. Should there be a ban on the sale of peat and peat-containing products in Scotland?

> **Yes - for all/ most peat sales**

Yes - for all horticultural peat sales

Yes -for retail horticultural peat sales (amateur/hobby gardeners)

Yes - for professional horticultural peat sales

No

If yes, please explain anything that should be exempt:

There should be no general exemptions to a ban other than the toleration of some contamination.

16. Will your business be affected by a peat ban?

> **Yes, positively**

Yes, negatively

No

If yes (positively or negatively), please

explain. :

As a political and public policy think tank, we are not reliant on sales of peat products directly, however the extraction and sale of peat is a matter of broader environmental policy and we all benefit from improvements in this regard.

17. In what year should peat sales stop for retail horticulture (amateur/hobby gardeners)?

Please state year:

Immediately on passing of legislation (the time between announcement of the Bill and passing of the Act shall serve as sufficient notice to transition)

18. In what year should peat sales stop for professional horticulture (growers/ landscapers/producers/business to business horticultural enterprises)?

Please state year:

Immediately on passing of legislation (the time between announcement of the Bill and passing of the Act shall serve as sufficient notice to transition)

19. In what year should peat sales stop for other uses? (please specify)

Please state year. You may break this down to different years for different parts of the sector.

Immediately on passing of legislation (the time between announcement of the Bill and passing of the Act shall serve as sufficient notice to transition) Understanding the impact of banning the sale of peat

UNDERSTANDING THE IMPACT OF BANNING THE SALE OF PEAT

20. Please explain any potential costs or burdens that you or your business might face as a result of the outcomes arising from this consultation

Please describe any costs or burdens:

N/A - In my experience, non-peat products are already price competitive with peat products.

21. Could outcomes arising from this consultation have implications, positive or negative, for the environment?

Please explain potential implications for the environment:

If non-peat alternatives are themselves extracted in unsustainable ways and/or require very long distance transport, then negative impacts could accrue.

All products - including non-peat growing media - should conform to Circular Economy principles.

22. Might outcomes arising from this consultation affect one age group more than another, either in a positive or negative way? Please specify and explain.

Please specify age group and provide explanation:

The proposed ban should not affect any age group more or less than any other (other than longer term environmental impacts having an impact on those who shall live long enough to experience them - positively or negatively)

23. Might any outcomes arising from this consultation have any positive or negative impacts on data protection or privacy?

Please specify impact on data protection or privacy:

Ensuring that businesses, producers and some sectors (private estates, for instance) comply with legislation may require inspection or other active regulation which may have privacy impacts - however these are overridden by the public interest, justice and environmental impacts that would arise from these areas evading or avoiding a ban on peat use.

24. Could any outcomes arising from this consultation have any positive or negative impacts on those on low incomes or in socio-economically disadvantaged areas?

Please specify impacts on socio-economically disadvantaged groups or areas:

As non-peat products are already price-competitive with peat products, there should be few impacts.

One possible impact may arise from those who extract peat for fuel for personal use - however, these households should be targeted for climate emergency mediation such as housing retrofits and heating upgrades.

25. Might any outcomes arising from this consultation have any positive or negative impacts specific to island communities?

Please specify potential impacts on island communities:

As with Q24, one possible impact may arise from those who extract peat for fuel for personal use

- however, these households should be targeted for climate emergency mediation such as housing retrofits and heating upgrades.

ANYTHING ELSE YOU'D LIKE TO TELL US

26. Please use this space for anything else you'd like to tell us in relation to ending the sale of peat.

To reiterate, all products in the Scottish economy should conform to Circular Economy principles. A ban on the sale of peat arises naturally out of such principles so we welcome this legislation though we are concerned that it has arisen not from those Circular Economy principles but from a more ad hoc political initiative.

- Dr Craig Dalzell, Head of Policy and Research, Common Weal

Response on behalf of Common Weal.