

RESPONSES MADE TO THIRD PARTY CONSULTATIONS

JANUARY 2017



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From: Campbell, Claire

Sent: 26 January 2017 13:57

To: 'Emma Goodyer'

Subject: RE: UK Peatland Strategy (SEPA Cons Ref: ORG13-A3084) - response (online) deadline: Frid 20 Jan 2017

Hi Emma,

Please find attached collated SEPA comments on the IUCN UK Peatland Strategy.

I hope these are helpful. Happy to discuss.

Kind wishes

Claire

Collated SEPA Response to the Consultation on the IUCN UK Peatland Strategy - <http://www.iucn-uk-peatlandprogramme.org/uk-peatland-strategy>

26th January 2017

Consultation Questions

We would welcome your views on the structure, content and future use of this document and ask you to consider the following seven questions in your response:

1. Does the vision (page 11) accurately reflect your vision of an aspirational future for the UK's peatlands? If not, how would you change it?

By and large, the vision is good. The fact that it is linked to a quantified target for area of peatland to be in good condition is particularly welcome. However, it is not clear 2 million hectares is the target; it could be useful to pitch the target area in the context of the UK peatland resource as a global asset.

The language could be more accessible – many may not associate all of the benefits peatlands provide with their natural capital. It would be good to define what is by natural capital in plain English in the document; the definition provided - "Peatlands are part of our natural capital – stocks of natural assets which provide valuable flows of ecosystem services for society" could be improved.

The danger of setting a goal so far away (2040) is that it can take off impetus to taking significant action now. We have seen many examples of this. Much shorter-term goals should also be set. Shorter term milestones are set in Table 3, but could the goal not refer to year-on-year progress towards meeting this goal.

The sustainable management needs to explicitly include the need for support by the local communities and the intrinsic interaction between people, management and peatland.

2. Would a strategy help you? If so, have we clearly articulated what we see as the benefits of the peatland strategy and its outcomes to our key audiences? Is there anything you feel is missing from the document or does it pose any restrictions or problems for you?

A strategy would be helpful to provide a framework for improvement of peatland quality throughout the UK. It should help people working on peatland conservation and restoration in different parts of the UK to work together.

In order to be helpful, it must have realistic and achievable goals that everyone would buy in to in order to achieve the goals. The strategy as it stands one would be useful to help government thinking, but it could be better at engaging key audiences, such as industry and local communities.

The objectives are ambitious however but it's not clear how the outcomes and milestones will be achieved. It would be improved by the addition of a clear delivery mechanism that includes Planning authorities, local communities and industry.

For example - Objective: Safeguard restorable peatland areas from development and land management activity that would undermine restoration potential.

Will you look to influence planning policy, Strategic development plans or target local authorities and their local plans and planning policy?

It is important to ensure that the UK Peatland Strategy does not contradict Scotland's National Peatland Plan in any way. Having taken a brief look at the summaries of both documents, there do not appear to be any immediately obvious problems, but this should be subject to further checking.

The strategy currently misses the direct interaction between people and habitats that have shaped fens and blanket mires. Be aware that the document in its current form could be interpreted as promoting the view that the absence of human pressure would result into pristine habitats, which is certainly not the case for fen.

3. Each of the UK Governments has, to varying degrees, recognised the importance of peatland protection and restoration and is supporting action. Where do you think a UK strategy could add value?

A UK strategy would add value by:

- helping to overcome the implementation hurdles
- by strengthening protection
- identifying common goals and agendas, and look for UK governments to work jointly on these actions
- helping to facilitate pooled funding and joint partnership initiatives
- imposing consistency in approach throughout the UK
- avoiding peatland restoration being carried out haphazardly or in a poorly-targeted manner

It is commendable that the UK Peatland Strategy supports the need for research and monitoring and emphasises the importance of peatland quality for delivering multiple benefits (i.e. natural flood management and water quality improvements in addition to nature conservation and carbon storage benefits).

4. How could this strategy be improved to help mobilise funding for peatland protection and restoration? Is anything missing from the document that could help you with this?

Perhaps the strategy should place slightly more emphasis on the benefits that private individuals/companies/landowners could get from restoring peatland that they control? This may be particularly important if government funding declines post-Brexit due to withdrawal of European funding. One initiative that may support this is the Peatland Carbon Code.

An unbiased assessment of cost and benefit would help to attract strong local and national support and would help generate interest from industry to contribute funding.

Make the links to funding sources such as options under agri-environment schemes, i.e. SRDP.

Identify research gaps to support the strategy - funding bodies and research providers will be able to directly support the strategy and bring in additional funds.

Link to planning support, such as planning gain and biodiversity off-setting.

By requiring assessment of the impact on carbon losses specifically through impact on peatland and supporting mitigation measures in Planning submissions, i.e. as part of the Strategic Environmental Assessment of relevant plans, programmes and strategies; Environmental Impact Assessment of relevant projects and supporting information for non-EIA development and grant-funded projects. Criteria for unacceptable carbon losses should be established in order for the carbon assessments to be useful. From a Scottish perspective, the key issue is not so much mobilising funding for peatland protection (Scottish Government are already doing a lot on this) as much as ensuring that this funding is targeted at the correct locations and correct restoration techniques.

5. Does the strategy adequately address the need to stimulate action on lowland peatlands under intensive production, with a view to safeguarding and enhancing peatland ecosystems, sustainable farming along with reducing carbon emissions and providing biodiversity benefits? What extra additional elements could be added to stimulate greater action for these peatlands?

The strategy covers lowland peatlands under intensive agricultural production reasonably well, but there doesn't seem to be as much on lowland peatlands used for other purposes, particularly those that have been, or continue to be, cut over for horticulture, mushroom growing or whisky sectors.

The Scottish National Peatland Group have discussed peat extraction for horticulture and it was noted that there needs to be better development of horticultural peat alternatives and particularly reducing cost of these in order to reduce horticultural reliance on peat. Peat extractors still claim they are meeting needs which cannot be supplied by other products. This needs to be comprehensively addressed.

To stimulate greater action for the lowland peatlands, the strategy could also promote peatland restoration as an offsetting mitigation strategy for developments in other areas, as is commonly applied to tree planting.

A commitment to work with UK governments on reviewing and revising agri-environment incentives for lowland peatland restoration could be helpful, and should promote long-term solutions for sustainable peatland management.

The action on fen could be expanded to really the human derived essential aspects in biodiversity management (in order to avoid issues arising in the Broads and in Bierbza)

The reference to "perverse incentives" in Objective 5b)ii) could be changed to "unsustainable incentives".

6. How do you see progress against the strategy being reported? And by whom?

It would be helpful to develop a delivery plan to implement the strategy; this would identify actions, lead bodies to take forward those actions and to report on their progress against the plan.

It would be good for progress on peatland protection and restoration to be reported annually, focusing on carbon dioxide releases; this could be worked into climate change reporting. It could be reported via the LULUCF greenhouse gas inventory using the Wetlands supplementary guidance on reporting carbon gains and losses associated with wetlands; thought to be coordinated by the Centre for Ecology and Hydrology.

In Scotland, reporting could perhaps be carried by the National Peatland Group, in conjunction with this group's role in reporting on the Scottish National Peatland Plan.

7. What can you do to help action the strategy's objectives and take this forward? Who do you think needs to be involved to ensure successful delivery of this strategy?

To ensure successful delivery of the strategy will require involvement of landowners, land managers, UK Government, devolved administrations, conservation bodies, regulatory agencies, National Farmers Union, Scottish Land and Estates (and their counterparts), NGOs including RSPB

It will need high level political support, funding regimes, land use and land use planning policy setters and land managers all to be engaged.

The Scottish National Peatland Group and Peatland Research and Monitoring Group both need to be involved to ensure strategy is successfully delivered, because it is important to ensure that the strategy compliments Scotland's National Peatland Plan.

Additional supplementary remarks

The current document has emphasises top-down influencing; it could be helpful to give greater consideration to the potential role of business (such as the whisky industry and their need of peat and thus interest into conserving and maintaining significant peatlands).

Long term sustainable management needs to be championed by the local communities otherwise strategies may come and go without achieving a long term solution. It will be important to find the right balance at a local level between conservation habitat management and a sustainable amount of traditional economic use.

The strategy requires a greater degree of balance in part 1 in order to be as accepted as fair and unbiased.

The value of peatlands is intertwined with its human use in certain settings; the document needs to clearly recognise that, for example, fens and tree-free blanket bog are a managed landscape. Without

grazing for livestock and harvesting for bedding and marsh hay the fens would be completely overgrown and be wet woodland. This is similar to the grazing by deer and sheep in the more upland settings. On a technical point, development of a raised bog and the hydrological integrity of the lagg around a raised bog can heavily rely on surface water or even groundwater. There are clear examples in Ireland where the peat integrity is reliant on a groundwater pressure in the underlying strata. Blanket bog can contain numerous groundwater-dependent springs and flushes and these biodiverse hotspots make up the mosaic that we call blanket mire.