

# Confor response to Defra’s Policy Discussion Document on the England Peat Strategy

24 JULY 2020

## Introduction

Confor is the not-for-profit organisation for sustainable forestry and wood-using businesses in the UK. We have more than 1,500 member companies, 730 of those are in England, representing the whole forestry and wood supply chain. Confor focuses on the strategic issues that are vital to the success and sustainable future of the sector. These include helping to build the market for wood and forest products, creating a supportive policy environment and helping members to become more competitive and successful.

## Questions

Please see questions below, which relate to specific areas of the discussion paper.

1.	<p><i>Are our targets realistic and achievable to ensure peatland is functioning healthily for the needs of wildlife, people and the planet by 2050? If not, what needs to be changed?</i></p> <p>Previous approaches to peatland restoration have largely been reactive, i.e. partnerships have come forward and then been funded. A more strategic approach utilising better mapping to map peat extent, quality and restoration potential (including hydrological modelling), encouraging new partnerships, supported by planning grants would give greater confidence that the targets are realistic and achievable.</p> <p>We welcome the proposal for a mixed approach to peatland recovery based on incentives for restoration and sustainable management, and initiatives to overcome non-financial barriers, particularly lack of information.</p>
2.	<p><i>One of the prime goals of the Nature for Climate Fund is Greenhouse Gas abatement. How could we achieve the right balance between upland and lowland restoration sites, given their relative differences in abatement potential?</i></p> <p>No comment.</p>
3.	<p><i>How should government use the Nature for Climate Fund to help stimulate the development of a market for private sector investment in ecosystem services and nature-based solutions to climate change?</i></p> <p>Closer working between the well-established Woodland Carbon Code and the Peatland Code and a common registry for projects will help to attract private funding for nature-based solutions – and better management of sites where peatland restoration and appropriate woodland creation can be integrated. In addition, the</p>

	<p>Peatland Code, as it moves from a best practice code to a carbon code, can learn from the near decade of operation of the WCC and, potentially from developing a guarantee to support future market development along the lines of the Woodland Carbon Guarantee.</p> <p>While domestic carbon offsetting offers much to attract private sector investment, its potential is currently limited as it is still treated as voluntary and has no place in meeting statutory carbon targets. Government should confirm its support for domestic carbon offsetting through the guidelines for streamlined energy and carbon reporting and consider whether domestic carbon offsets could be included in a domestic Emissions Trading System.</p> <p>Biodiversity Net Gain and Environmental Net Gain could also play a role in drawing in development funding, although carbon metrics require further development.</p>
4.	<p><i>What other actions, if any, could help to transform the level of peatland restoration in England?</i></p> <p>Opportunities may arise post-CAP if a reduction in Basic Payments encourages landowners in some marginal farming situations to look at diversification options. Confor is working closely with Defra to ensure that a future ELMs is able to support woodland creation and management that optimises the delivery of public goods. The Strategy could seize opportunities to provide support at the whole landholding level for woodland removal from afforested peat where appropriate and woodland creation on the same land holding, helping to achieve Government’s objectives for increased woodland cover and peatland restoration together.</p>
5.	<p><i>Where are the strategic locations where partnerships can work together on large-scale peatland restoration projects, as a contribution to the Nature Recovery Network? What actions are best used in these places to recover and conserve peatland wildlife?</i></p> <p>Choosing appropriate locations for large scale peatland restoration needs to start with an objective, and realistic, appraisal of peatlands that are restorable and of the highest priority for restoration. This assessment should be made without regard to ownership. Once the best value for money, large scale, peatland restorations are identified then attention should turn to forming partnerships which can deliver restoration projects.</p>
6.	<p><i>How should the government determine the right balance between more sustainable management and restoration of lowland agricultural peatlands?</i></p> <p>No comment.</p>
7.	<p><i>What other land uses or management practices could we include in the “Reduce” category?</i></p> <p>No comment.</p>

<p>8.</p>	<p><i>How should government ensure that a successful horticultural industry can operate without peat?</i></p> <p>The nursery sector uses considerable volumes of compost every year, 1000's of m<sup>3</sup>/annum. These composts range from wholly peat free composts to peat reduced composts, with very few growers using wholly peat-based compost. The awareness and significant reduction in peat usage has been practised within the industry for years now. But, the complete elimination of peat as an ingredient in all composts is not practical or realistic. Certain seeds, and some species of young plant do not germinate, grow, or thrive reliably in composts without at least an element of peat. Peat provides a fine, open, yet moisture retentive medium, which facilitates effective and reliable germination, growth and the survival of the fine roots for delicate species to grow. Although the reduction of peat usage is the long-term objective of the sector, further support is required for the forestry nursery sector for research into alternatives to peat that addresses current issues associated with drying out, consistency of quality, particle size and cost.</p> <p>Forestry plant supply is moving progressively towards cell grown production, as opposed to bare-rooted plant supply – for the reason of providing more reliable and flexible plant establishment, over a longer period in the season, and to enable more trees to be planted in a year. This is important to enable the forest industry to meet the increasing objectives and targets of tree planting.</p> <p>Some of the UK's large cell grown forest nurseries have reduced from circa 100% peat usage in their composts 30 years ago, to circa only 30% peat usage today. There is no reason not to think that peat usage in compost will still reduce, but it is not realistic to think peat usage can or will cease completely. Work is always ongoing on the development of better peat substitutes but it would be a damaging and detrimental step to stop peat usage altogether.</p> <p>The lesser and decreasing amount of peat that is harvested and used today is all sustainably managed. Harvesting is no longer from sensitive or delicate sites.</p>
<p>9.</p>	<p><i>How can we ensure a better balance between tree-planting, peatland restoration and nature recovery?</i></p> <p>Confor welcomes the acknowledgement of Government's ambitions to both increase net woodland cover and increase priority habitat, including restoration of peatlands. We also welcome acknowledgement of the existing framework of (1) the UK Forestry Standard, (2) EIA regulations as they apply to afforestation which ensure that new planting is appropriately sited and designed, (3) EIA regulations as they apply to deforestation which ensure that the implications of woodland removal are duly considered, and (4) the Open Habitats Policy to guide decisions on when to remove woodland and forests to restore valuable open habitats.</p> <p>The Strategy could seek opportunities to integrate peatland, woodland and other land use policies, promoting principles and methodologies of decision making which protect and increase our natural capital and contribute to nature recovery. The England Peatland Strategy could be strengthened further by having robust and complimentary links with other relevant strategies and policies, for example the</p>

	<p>developing proposals for a Nature Recovery Network, England Tree Strategy, or developing work around Biodiversity and Net Environmental Gain.</p> <p>Some shallow peat is degraded, does not support priority habitat and is not capable of restoration because of the wider hydrology of the area; this represents a resource of agriculturally unproductive land that could be used for meeting Government’s challenging woodland expansion aspirations. The proposed Nature Recovery Network provides a framework for establishing the most appropriate use of such land, adopting a natural capital approach.</p> <p>To help support decision-making for new planting on degraded shallow peat and for restoring existing forests on peat to non-woodland habitat, the forestry industry would welcome the opportunity to work with Defra and Natural England to develop country guidance to support land managers and delivery bodies in applying the over-arching policy and guidance set out in the UK Forestry Standard.</p> <p>The forestry industry’s role in peatland restoration could be enhanced through funding being made available through ELM or other land management grants to (1) undertake restoration; (2) maintain the restored habitat in good condition; and (3) to allow for compensatory planting to ensure that England’s timber resource is not depleted and that woodland removal from peatland does not detract from Government’s woodland expansion aspirations.</p>
10.	<p><i>What should be included in our approach to reducing the risk of wildfire?</i></p> <p>Confor welcomes the inclusion of wildfire risk assessment within the PDD. It is critical that wildfire is addressed at the landscape scale, rather than at the individual habitat or land-holding level; it is also important that the risk of all habitats and their resilience to wildfire is considered. An improved approach to integrated wildfire planning across land covers that include woodland and peatland is required and should be a focus of attention.</p> <p>We note that the evidence-base underpinning prevention approaches such as re-wetting, is limited and may not be robust during high risk periods of prolonged drought, while many of the research articles cited may not be relevant to UK conditions; the limitations of UK-based wildfire research, to date, should be addressed, including the effectiveness of land management alternatives to burning. We welcome the mention of new mapping initiatives as they relate to peatland and wildfire risk.</p>
11.	<p><i>What other practices that would be considered damaging, should be reflected under the "Protect" category?</i></p> <p>No comment.</p>
12.	<p><i>Would you like to participate in a roundtable in July/August?</i></p> <p>Yes.</p>

We welcome future engagement with Defra to help to achieve a better balance between peatland restoration and woodland creation.