



## ENGLISH HERITAGE

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Our ref: defra  
Horticultural  
Peat  
Your ref:  
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11<sup>th</sup> March 2011

Dear Judith

re: **Consultation on reducing the horticultural use of peat in England**

English Heritage was recently made aware that the above consultation was open, and we offer the following responses to the consultation questions.

English Heritage is a Non-Departmental Public Body established under the National Heritage Act 1983 to help protect the historic environment of England and promote awareness, understanding and enjoyment of it. We are the Government's statutory adviser on the historic environment and although we are sponsored by the Department for Culture, Media and Sport, our funding agreement is co-signed by the Department for the Environment, Food and Rural Affairs and Communities and Local Government.

### **Chapter 1: The case for action**

**Question 1: Do you support the rationale for taking action to reduce the horticultural use of peat?**

Yes.

### **Chapter 2: Towards a new policy framework**

**Question 2: Do you agree that a better supported, industry-led voluntary approach is the right way forward?**

No, not without additional measures, such as ensuring that prices reflect the ecosystem services value of the peat resource. Greater incentives to purchase peat-free growing media are needed, particularly for the dominant amateur gardening market. Fiscal measures similar to landfill and aggregates taxes should be considered to address the price differential.

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**Question 3: Do you agree that these are the core criteria that should guide the development of a future policy framework?**

Yes. The volume-based assessment is critical to successfully reducing use, as are the interim milestones for production.

**Chapter 3: An overarching goal**

**Question 4: Do you agree that the horticultural use of peat can and should be phased out in *all* markets, and for *all* plant species and growing media products?**

Yes.

**Based on evidence where possible, should there be any exceptions to this?**

No.

**Chapter 4: Government and the public sector**

**Question 5: Do you agree (based on evidence where possible) that peat can and should be phased out of all public sector procurement activities, including Local Authorities, by 2015?**

Yes.

**Question 6: Do you think that there is more that Government and the public sector should be doing to support and enable the switch to peat-free growing media?**

Yes.

**If so, what would be the priorities?**

1) Making peat-free media the most attractive purchase using both social and financial incentives; 2) Improved dissemination of message about why horticultural peat use is unsustainable (i.e. because of accumulation rates) and what negative impacts it has on landscape and individual places both here and abroad.

**Chapter 5: Gardeners, retailers and the amateur sector**

**Question 7: Do you agree (based on evidence where possible) that the use of peat in soil conditioners can and should be phased out by 2013?**

Yes.

**Question 8: Do you agree (based on evidence where possible) that the use of peat in the amateur market can and should be phased out by 2020, and that the proposed interim milestones are sufficiently ambitious and achievable?**

Yes, but only if coupled with strong social messages and financial incentives to attract changes in behaviour across the piece. Price parity of peat and peat-free products, at the very least, should be the starting point.

**Question 9: Do you think that more needs to be done to build consumer awareness, improve labelling or improve and standardise the quality of growing media products? If so, what would be your top priorities?**

Yes. The proposal to show the percentage range is good. However, given the evidence that there is no clear benefit for any product to have greater than 70% peat content, surely there should be a ban on exceeding that amount. Also, there should be an additional label, prominently displayed on all bags, stating that peat use is unsustainable and damages the environment.



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## Chapter 6: The professional horticulture sector

**Question 10: Taking account of initial analysis, are there any subsectors that you think are likely to face higher or lower costs of transition? If so, what evidence do you have for this?**

No comment.

**Question 11: Do you agree that a time-limited industry working group should be established to develop a „roadmap“ to a peat-free future in professional horticulture? If so, do you have comments on the proposed objectives above?**

No comment.

**Question 12: Do you agree that the use of peat in the professional grower market can and should be phased out by 2030?**

Yes.

**Based on evidence where possible, do you think it is feasible to phase out peat in this market before 2030?**

No comment.

## Chapter 7: Review and monitoring

**Question 13: Do you support proposals for annual Defra-led monitoring of peat-based growing media sales?**

Yes. Results should be publicly available.

**Question 14: Do you agree that data on the volume of peat used in horticulture is most effectively collected from growing media manufacturers?**

Yes, and results should be publicly available.

**Question 15: What are your views on timing and proposed objectives for the 2015 policy review?**

In addition, annual reviews of milestones are needed which should comprise interim reports on progress and delivery, together with, if relevant, an assessment of why milestones are not being met and recommendations for any supplementary measures that may need to be introduced to get back on track.

Please contact me directly if you would like to discuss any of the comments made in this response.

Yours sincerely



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