

Response ID ANON-Q6Q7-ZXEN-M

Submitted to Ending the sale of peat in Scotland
Submitted on 2023-05-11 20:26:12

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)

Representative of a trade body

Please specify if necessary:

The Association for Renewable Energy and Clean Technology (the REA) is a not-for-profit trade association, representing British renewable energy producers and clean technology and promoting the use of renewable energy in the UK. It has around 550 corporate members, making it the largest renewable energy trade association in the UK.

The REA's Organics forum and its Green Gas forum together comprise 422 members, some of which operate commercial composting facilities, commercial scale anaerobic digestion (AD) facilities and recycle organic materials to land. We have members who supply their products into the growing media sector. More info available at www.r-e-a.net.

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

Please specify:

Some REA members produce BSI PAS100-certified compost and BSI PAS110-certified digestate, primarily from food, garden, and agricultural wastes. Some members also use compost to produce peat-free and peat-reduced growing media. We are responding as a trade association that represents businesses which can mitigate the impact of banning peat for the amateur and professional horticulture sector by supplying other materials that can be used as a replacement or partial replacement for peat.

3 How many employees are there in your organisation?

10-49

Your use of peat

4 For what purpose do you use peat?

Other (please specify)

Please specify if necessary:

Most REA members do not use peat. The very small number that are related to peat are those who have other companies in a commercial group who produce growing media which, sometimes, is based on or contains peat. The role of most REA members in a commercial group in this circumstance is the production of compost or fibre digestate which can be and is used as an alternative to peat in growing media.

5 Do you consider environmental impacts when using peat?

Not Answered

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

The REA is concerned about the greenhouse gas emissions from the extraction of peat, as well as the damage to soil and Scotland's natural heritage. The REA support the environmental concerns raised in the Strategic Environmental Assessment (SEA) undertaken for this consultation by Land Use Consultants (LUC), particularly points 1.14 through 1.21.

The REA supports consumers avoiding the use of peat through the businesses of its members, who produce alternative ingredients to peat for growing media, and work with local authorities, the UK and Scottish Governments, and consumers to ensure that the product is as high-quality and fit-for-purpose as possible.

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

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

Please specify if necessary:

The REA believes that generally it is easy to find alternatives in local retail outlets, however in some cases there are improvements that can be made in labelling. It is not always clear from the information provided on a bag of growing media, what ingredients it has been made from and if it contains peat.

Concerning the ease of creating peat-free alternative growing media, REA members have reported that they have successfully transitioned to producing peat-free growing media. The REA acknowledges that there is a challenge regarding consistency and efficacy and an increase in the costs of growing media, but that for the first point, these changes are not significant when considering a ban on peat-based products for the amateur horticulture sector, and for the second point, that this is simply a reflection of the true cost of sustainably producing a growing media.

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

Reason for growing media choice - Performance:

Reason for growing media choice - Cost:

Reason for growing media choice - Consistent product quality:

Reason for growing media choice - Environmental consequences:

Reason for growing media choice - Brand loyalty:

Do you have any other considerations? Please explain here:

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?:

No

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

No

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

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

The REA fully supports labelling on the presence of peat in growing media for potted plants at the point of sale and on bagged growing media. There should be more transparency enabling consumers to make informed choices. While we acknowledge that it is harder to impose a ban on the use of peat-based growing media in the professional horticulture at this stage, the REA believes that providing consumers with clear information and allowing their values to be indicated through their purchases is vital for sending signals to the professional horticulture sector.

The REA also supports clear standards for labelling on growing media, both in terms of required information on the products' environmental impact and on the presence of peat.

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

Not Answered

Please provide any further explanation here:

Moving away from using peat

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

Yes

Please provide any further explanation if required:

REA members have indicated that they supply effective peat-free alternative growing media products now. As indicated above, some members have noted minor losses in efficacy, notably for use as a substrate for ericaceous plants. However, the REA believes that this is not an obstacle for any companies buying peat-free growing media for retail to the amateur horticulture sector.

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

Other (please specify)

Please specify if necessary:

As noted above, most of the concern from the professional horticulture sector is about the presence of equally-effective alternatives for all plants.

Another concern that has been raised, concerning the horticulture sector in England, is about the supply of a large quantity of suitable quality

alternatives. This is both about ensuring supply meets demand, and that the alternatives supplied are not environmentally harmful.

On the first point, the REA supports the Growing Media Association's (GMA's) Responsible Sourcing Scheme for Growing Media (RSSGM) as a measure of the appropriateness of various growing media feedstocks. [<https://www.responsiblesourcing.org.uk/>]

On the later, the REA has discussed this issue with the Horticulture Trade Association (HTA), and believes that the quantity of compost supplied, and the growth in the sector in future years as various pieces of legislation and policy come into effect in the UK over the coming years, mean that compost will be able to play a significant role in offsetting the demand for peat-based growing media.

11c 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:

The REA supports the earliest possible date for a ban on the sale of peat generally. A reasonable baseline could be to align Scottish legislation with the ban on peat-based products in England and Wales; the earliest dates consulted on were 2024 for the retail sale of peat for the amateur horticulture sector, and 2028 for the professional horticulture sector. The REA supports these dates.

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:

REA members have noted the particular difficulty of alternative growing media for ericaceous plants. However, peat-free alternative growing media for the amateur horticulture sector specifically for ericaceous plants are on sale, so the REA understands that this is a question of a wider range of growing media products, as opposed to treating alternatives to peat in growing media in the same "one size fits all" approach.

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

No

Please specify if necessary:

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

Please explain further if necessary:

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

Yes - for all/most peat sales

If yes, please explain anything that should be exempt:

In theory the REA supports a ban on all/most peat sales, but as our members principally cover peat-free alternatives for the horticultural sector, will only comment on this point. The REA does not support any exemptions for the amateur horticulture sector. While the REA recognises that for some applications alternatives are less effective or suitable alternatives may be lacking, such as for ericaceous plants, we do not believe that, for the amateur sector, this is sufficient reason provide an exemption from a retail sales ban.

The REA understands that at present, there is a case for exemptions for the professional horticulture sector. However, the REA would note this given investment for innovation and time to adapt, it is expected that suitable alternatives without a loss in efficacy for any plant type would be found. Notably, Sizzle has published a report on sustainable alternatives to peat, and is continuing to conduct research in this area. [<https://www.sizzle.org.uk/our-experiments/sustainable-alternatives-to-peat>]

16 Will your business be affected by a peat ban?

Yes, positively

If yes (positively or negatively), please explain. :

REA members would benefit from a peat ban because of the ensuing demand for their products, ie. compost and digestate, as an alternative to peat for growing media products.

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

Please state year:

2024

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

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

2028 or sooner where feasible.

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

Please specify use(s) and year(s):

2024

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:

REA members would not bear any direct costs or burdens. However, to meet demand for peat replacement ingredients, there may need to be changes to business practices. For example, to further minimise contamination (though organics recycling business are generally doing everything possible with the feedstocks provided), sites may have to be more selective with feedstock inputs to ensure that contamination is not present in the finished products and in turn not further spread through growing media. In addition, to meet the scale of demand, sites may have to expand current operations, conditional on their being sufficient regulatory support and a business case, in addition to sufficient appropriate feedstocks to reduce competition between sites.

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

Please explain potential implications for the environment:

Keeping peat in the ground has a significant positive impact for the environment both in terms of carbon storage and biodiversity. Should the use of peat in growing media be replaced by compost, there are several environmental implications.

The positive implications relate to the soil benefits and carbon sequestration potential of the use of compost which it is expected will ultimately be applied to land. Applying compost to land improves soil fertility, increases water retention, enhances the soil structure, reduces soil erosion and increases the microbial activity. In addition, the use of waste feedstocks mean that the horticulture sector would be playing a part in creating a circular economy by using, and providing an additional secure source of demand, for treated food, garden, and agricultural waste products instead of these materials being disposed of in landfill or energy from waste facilities.

The negative implications primarily concern the content of the waste feedstocks, the limitations of treatment, and therefore the transportation of any concerning components of these feedstocks to land. The concerning materials are primarily plastics, and anti-bacterial resistant organisms. These all result from the presence of these materials at earlier points in the supply chain, but nevertheless could be further spread to land with the use of compost. Mitigating these potential damages is a question of improving regulation and ensuring effective communication on organic waste recycling, both in businesses and in households, and improving practices on the use of antibiotics in the agricultural sector.

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:

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:

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:

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:

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.

Any further comments:

About you

27 What is your name?

Name:

Jenny Grant

28 What is your email address?

Email:
jenny@r-e-a.net

29 Are you responding as an individual or an organisation?

Organisation - trade body

Please specify as necessary:

30 If you are responding on behalf of an organisation, which organisation do you represent?

Organisation:
The Association for Renewable Energy and Clean Technology (REA)

31 Where are you based?

Elsewhere (please specify)

Please specify if necessary:
REA members are based throughout the UK, including in Scotland. The REA office is located in London.

32 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

33 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

34 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

35 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Neither satisfied nor dissatisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Very satisfied

Please enter comments here.: