

## Response ID ANON-Q6Q7-ZXEX-X

Submitted to Ending the sale of peat in Scotland  
Submitted on 2023-05-11 20:12:04

### 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)

Other (please specify)

Please specify if necessary:

Representative organisation – primary producers

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

Please specify:

3 How many employees are there in your organisation?

Less than 10

### Your use of peat

4 For what purpose do you use peat?

Heating - extracted from own/rented land for own use as fuel

Please specify if necessary:

SCF represents crofters and crofting communities. Crofting is a unique model of predominantly small-scale and tenanted land use in the Scottish Highlands and Islands. Crofting often involves extensive sheep and cattle production but can include other uses such as (agro)forestry and horticulture.

Harvesting or cutting peat for heating - for personal use only, not for selling - is a long-standing tradition which is protected under crofting law (turbary rights) and may also be regulated through grazing regulations in relation to peat cutting rights on common grazings.

5 Do you consider environmental impacts when using peat?

Yes

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

Peat cutting for heating (for personal use only - not for selling) is traditionally done by crofters on a very small scale to satisfy basic needs and with minimal 'fuel miles'. When the top turf is taken off (up to 12" deep depending on whatever root system is growing - heather goes quite deep) that turf is placed on top of the last year's casting, heather side up, to allow for the fastest regeneration. It is laid exactly as cut out - no bare peat is left uncovered. This practice of careful manual peat extraction, done with the environment in mind, can help to repair damaged peatlands.

The Western Isles and Shetland, where peat cutting is still practised most frequently, has the highest levels of fuel poverty in Scotland and the energy crises has emphasised the significance of peat as a viable source of heating, as part of the basic right to an adequate standard of living. In response to a survey on rising costs of inputs (September 2022), conducted by SCF but open to all crofters, 41.8% of respondents raised significant concerns about rising costs of electricity.

SCF urges Scottish Government to dedicate financial resources to explore the viability of sustainable, alternative heating sources within the specific context of crofting communities in the Highlands and Islands, similarly to projects that are currently undertaken in the Irish uplands. It should take into consideration the specific needs of old crofting houses which are difficult to heat, as well as the impact of alternative sources of heating in other countries (e.g., if wood is imported).

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

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

Please specify if necessary:

There is currently no requirement to identify ingredients, and percentages included.

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:

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?

Not Answered

Please provide any further explanation if required:

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

Please specify if necessary:

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:

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:

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

Not Answered

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 horticultural peat sales

If yes, please explain anything that should be exempt:

Composts made with naturally filtrated peat such as Moorland Gold Compost (Soil Association certified) should be exempt.

16 Will your business be affected by a peat ban?

Not Answered

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

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

Please state year:

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. :

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

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

## 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:

SCF opposes an expansion of the scope of this consultation to include traditional use of peat for heating. Unless significant investment is made by Scottish Government to explore alternative heating sources, specifically in the crofting/Highlands and Islands context, this would exacerbate fuel poverty. The full environmental impact of alternative fuel sources (incl. abroad) would also need to be considered.

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

Please explain potential implications for the environment:

If the scope of restrictions were, in the future, expanded to include cutting of peat for domestic use, this could lead to significantly more 'fuel miles' if heat sources are imported. SCF supports local research and engagement to explore viable and sustainable alternative sources of heating in the crofting counties.

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:

If restrictions on peat were, in the future, expanded to include domestic use for heating this could disproportionality impact on older generations who have traditionally relied on peat as the only viable source of heating in remote areas. Almost a third (31%) of the Highlands and Islands population is projected to be aged 65 years or older (<https://www.hie.co.uk/media/13150/rural-and-regional-disadvantage-in-the-highlands-and-islands-executive-summary.pdf>). Older households are also most impacted by fuel poverty (<https://www.ageuk.org.uk/globalassets/age-scotland/documents/policy-and-research/the-impact-of-rapidly-rising-energy-bills-on-older-people-in-scotland----age-s>

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:

As stated above, the areas that have been most reliant on peat for heating – Western Isles and Shetland – are also the areas that are most disadvantaged in terms of fuel poverty (e.g., 18% in Shetland, to 25% in Innse Gall, compared with 12% for Scotland overall - <https://www.hie.co.uk/media/13150/rural-and-regional-disadvantage-in-the-highlands-and-islands-executive-summary.pdf>).

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 stated above, the areas that have been most reliant on peat for heating – Western Isles and Shetland – are also the areas that are most disadvantaged in terms of fuel poverty (e.g., 18% in Shetland, to 25% in Innse Gall, compared with 12% for Scotland overall - <https://www.hie.co.uk/media/13150/rural-and-regional-disadvantage-in-the-highlands-and-islands-executive-summary.pdf>).

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:

If any further restrictions on use of peat (as per question 4) are anticipated, this should be accompanied by adequate consultation of crofters and SCF.

About you

27 What is your name?

Name:

Miranda Geelhoed

28 What is your email address?

Email:

miranda@crofting.org

29 Are you responding as an individual or an organisation?

Other (please specify)

Please specify as necessary:

Representative organisation – primary producers

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

Organisation:

Scottish Crofting Federation

31 Where are you based?

Scotland

Please specify if necessary:

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

Publish response only (without 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.:

It was not quite clear why a general question on use of peat was included (Q4).

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

Slightly satisfied

Please enter comments here.: