



Briefing on the Defra consultation

‘Ending the retail sale of peat in horticulture in England and Wales’

January 2022

Introduction and purpose

This briefing gives advice and information from the HTA to help members respond to the Defra consultation on ending the retail sale of peat in horticulture in England and Wales and the supporting ‘call for evidence’ from Defra on removing peat from use in the professional sector.

Members can:

- Respond directly to the consultation,
- And/or in provide feedback and insights to the HTA to represent members’ views to government.

The HTA helped establish the cross-industry Growing Media Taskforce (‘the Taskforce’) and will be responding to the consultation under this banner.

Who are the Taskforce?

The Growing Media Taskforce is made up of the HTA, the Garden Centre Association (GCA), the National Farmers Union (NFU), the Growing Media Association (GMA) and the Responsible Sourcing Scheme (RSS). We also coordinate our activity with the Royal Horticultural Society (RHS). We’re also sharing information and coordinating with other industry groups to help provide a consistent and united industry response.

What have they said so far?

The taskforce has committed to end the sector’s use of peat, pledging to remove it from the retail market as early as 2025 and no later than the end 2028. For professional horticulture, the range is between 2028 and 2030. We have been clear with government that achieving these targets re dependent on government support, such as transition funding, unlocking access to new and novel alternative materials.

What are they doing?

The Taskforce is working together implementing the detail of a plan covering eight focus areas. For more information click [here](#).

How to respond

- The consultation can be read and [answered online here](#)
- A pdf of the complete consultation document can be [downloaded here](#)
- For retailers the proposals start on Page 10
- For growers / professional users there as an Annex on page 16 that calls for evidence

If inputting into the HTA/ Taskforce response: Please send your comments to policy@hta.org.uk . The deadline for comments to the HTA is **Friday 18th February**

If responding directly to Defra: It would be appreciated if you could align your responses with what we have set out below – this is in line with the taskforce’s current asks of Government and will reflect the Taskforce’s position on the overall proposals. The deadline for the Defra consultation is **18th March 2022**.

A co-ordinated response from industry and businesses means we will be seen as presenting a united front in our calls to action.

General points to consider making

1. Horticulture is a responsible industry. State all the environmental and wellbeing benefits it provides.
2. Say that we fully accept our role and responsibilities, shown with an industry action plan to achieve realistic and sustainable peat removal, but also that this debate needs to be put in context – less than 0.04% of UK peatlands, all in lowland areas, are extracted for horticulture use.
3. State that **legislation is not required**. The Taskforce has already stated a realistic yet ambitious timetable for achieving what a peat-free, responsibly-sourced supply chain might look like.
 - Removing peat from bagged growing media sold at retail by 2025-2028
 - Removing peat from professional sector between 2028 and 2030But achieving this is **entirely dependent on government support**.
4. Best message to give is to be positive, to say the industry can achieve peat free status without legislation, but **only** with Government assistance (see below for list of Government actions/asks) in helping to unlock barriers to alternative supplies – both in terms of quality and quantity.
5. Two million cubic metres of alternative material to peat needs to be found. The identification, sourcing, and development of alternative ingredients to make up these two million cubic metres of peat currently used in growing media must be done in an environmentally responsible way.
6. The sector has been making progress - we’re now at a historic low use of peat – less than 41% overall, with innovations and significant investments in the market by manufacturers and users of growing media over recent years. (See reference section)
7. Use specific examples of your own experiences of good practice and what has worked technically and what hasn’t and why, including access to the right quality and quantity of alternative materials – this is particularly pertinent for those answering Annex A Questions 26&27 – the professional sector’s ‘call for evidence’.
8. Say how important gardening is – 30 million consumers - and include gardening sales statistics (see reference section). Explain why action can be taken by the industry on this subject without putting consumer-confidence in the plants and trees that they buy at risk. Sustainable, quality change is needed.
9. If the proposed timing of 2024 is put in place will result in less growing media being available for consumers and professional growers – the key issue is on quality and quantity of materials. There is already a global shortage of quality alternative materials and forcing this change by 2024 will result in negative unintended consequences of higher prices and shortages of supply, impacting the UK’s ‘green growth’ garden industry and the 25m people who buy growing media each year.

10. Any shortages could put off consumers from gardening, as growing media is intrinsic to planting. This has a knock-on effect of fewer plants being bought and with it less gardening and all the associated benefits connected to it.

Asks of Government:

The following is a list of Government asks the Taskforce is stating must be in place for the industry to move away from peat within the Taskforce's stated timelines:

- Ensure the quality and consistency of green waste collections across Great Britain is mandatory and accessible to growing media manufacturers as a potential ingredient.
- Ensure that the industry can access the wood fibre needed as an alternative material. Currently the industry struggles to compete when this material is diverted to the energy industry.
- Amend the End of Waste Regulations to enable access to potential sources of peat-replacement ingredients.
- Support business development grants for manufacturing businesses to move to producing alternative ingredients, including storage facilities for alternatives
- Support business development grants for plant producers to change machinery that handles growing media.
- Support grants and investment in comprehensive and coordinated research and development
- Ensure that there is a principle for exemption included for any products that cannot be grown without peat, for example plug plants, some species of acid-loving plants, exotic plants for example. The exemptions must be in place while ongoing research and development is undertaken to move to a different timeline for peat removal.

The four proposals in the consultation

You might want to highlight the following points to each individual proposal made by Defra.

1. 'Business as usual' – the voluntary approach

Re-state the target dates as set out by the taskforce last year.

- Removing peat from bagged growing media sold at retail by 2025-2028
- Removing peat from professional sector between 2028 and 2030

These dates are **dependent on the Government help** stated above. There should be regular reviews to ensure alternative ingredient provision is on track, that there are no new barriers to alternative supply and that R&D has progressed significantly in those areas required.

2. Mandatory Reporting of the volume of peat sold (all sellers)

The main reason the Government gives for suggesting this option is to raise awareness within the supply chain of the need to move away from peat.

The Taskforce suggests that this issue is already very high up on the whole of the supply chains agenda and is a priority in horticulture. Even by dint of issuing this consultation alone, awareness has been raised. In practical terms, any reporting mechanism will mean more administration for businesses for little potential gain.

Volumes of peat sold / used in horticulture is [already gathered for Defra](#) by an independent consultant via manufacturers reporting. It is co-ordinated by the HTA.

3. Ban on the Retail Sale of Peat

Highlight the points in the general section above – the industry can get there itself without potentially industry-damaging legislation and reiterate the actions that Government must take, particularly on support for unlocking access to alternative materials. What is required is quality and quantity.

Ask a question about the scope of any ban – e.g., is it confined to bagged growing media sold at retail? The definition in the consultation is unclear).

What are the implications for growing media supply in the whole sector if a retail ban came in? If a ban is in place for bagged growing media containing peat, this likely means consequences for the professional sector – e.g., the available alternative ingredients will be used up in bagged media, meaning a shortage of quality and quantity for the professional sector. It has potential to mean the whole of horticulture takes longer to move away from peat into responsibly sourced growing media.

We all want to keep the public gardening, and actions like this from Government don't help with a positive perception of gardening. Consumer surveys have found that 'banning' a product negatively affects the public's perception of an industry.

4. Point of Sale bag charge

The proposal states that a charge be made at the till for any bagged product containing peat. The comparison is made to the plastic bag charge.

This option includes the following potential pitfalls:

- Increases costs for consumers in an already high inflationary environment.
- Means those gardeners on the lowest incomes are most impacted
- Question if it would truly drive behaviour change.
- By the time it is rolled out the industry likely to have moved significantly anyway, negating the desired effect.
- The actual mechanism of charging is not clear at all.
- It represents extra cost and administration for businesses.
- Who receives these extra funds?

Annex A – Call for evidence – for professional growers and non-retailers

The annex asks for evidence from professional users and non-retailers.

Specifically

- Technical barriers to replacing peat
 - Availability of alternative ingredients
 - Imported products
1. As a 'professional user' e.g., a grower, you might wish to give your own personal experiences with trialling or moving to peat free mixes.
 2. Discuss the target date of 2028 for removing peat from all horticultural products, and what that might mean for your business.
 3. Provide evidence of what you need as a business to achieve peat free status.
 4. Show what and why exemptions are needed.
 5. Explain what research and development you feel is required to move away from peat.

6. State what action you would like to see Government take and what benefits they would be to industry.
7. Evidence what you as a business might commit to in order to help the process.

Imports

Highlight that Government needs to consider how to deal with imports of plants that are in growing media containing peat without compromising the supply chain and ensuring there is no competitive disadvantage to GB-based businesses – this is for both retailers and growers to answer in importing of plants. We want to have discussions with Defra on what some of the solutions look like – there are other options than a ban which is potentially counterproductive and cumbersome.

Internal market

These are issues that cover the whole internal market of Great Britain, not just England and Wales. Highlight that consideration should be given to the respective devolved governments' decision-making and next actions, and their impact on the industry.

Further sources of information & some key facts

- Taskforce [Response to the Launch](#) of the Hort Peat Consultation
- The latest statistics on peat use and extraction can be found [here](#). This page will be updated regularly as new statistics are release in the coming weeks, so please keep checking back.
- 2 million cubic metres of peat are used in horticulture (as a whole) which must be replaced by equally effective alternative ingredients
- In 2019 1,540 hectares were licenced for peat extraction in the UK, of which an estimated 1,175 were actually under extraction.
- This accounts for 0.04% of total peatland area
- Peat as a proportion of growing media fell from 48% in 2019 to 41% of total volume in 2020
- Total garden centres sales in 2021 increased by 20% on 2019. See the [HTA Market Update](#) information for more detail.
- The UK horticulture and landscaping sector is worth over £28bn, with over 600,000 jobs. [Here is the report](#). The Ornamental Horticulture Roundtable Group established in 2021 that with the right Government support the sector could be worth £41.8 billion and support 763,400 jobs by 2030.
- HTA Growing Media [landing page](#)
- Growing Media [Taskforce Announcement](#) (May 2021)
- [HTA response](#) to Food Waste & Garden Waste Collection consultations
- Responsible Sourcing Scheme for Growing Media ([RSSGM](#))
- [Growing Media FAQs](#) (HTA members only)

Contact for comments and information

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