

STATEMENT BY SOMERSET COUNTY COUNCIL

September 2014




MATTER 8: PEAT

Background Documents referred to within Statement

- Minerals Topic Paper 3: Peat Reserves and Supply (Doc Ref SD8c)
- Peat correspondence on data 2010 to 2013 (Doc Ref TD46)
- Peat site surveys Summary Report (Doc Ref TD42)
- Peat workshop report (Doc Ref TD41b)
- Government Response to the Sustainable Growing Media Task Force (Doc Ref TD9)
- Sustainable Growing Media Task Force report and roadmap (Doc Ref TD17)
- The Natural Choice (Doc Ref NE23)
- National Planning Policy Framework (Doc Ref NE3)
- Natural Environment White Paper Implementation Update (NE42)
- Greater Manchester Minerals Plan (Doc Ref TD53)
- Inspector's Report to the Greater Manchester Minerals Plan (Doc Ref TD54)
- Chat Moss decision and report (Doc Ref TD10)

Document Control Sheet

	<u>Position</u>	<u>Name</u>	<u>Date</u>
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For the forthcoming Hearing, the Inspector has requested that Somerset County Council briefly summarise their position on each discussion topic. The following is a brief summary of Somerset County Council's response to Matter 8: Peat, examining the **Issue: Whether the strategy for peat is the most appropriate.**

Question 1

What is the demand for peat? Is demand accurately reflected in the Plan?

SCC Response

- 1.1. Demand for peat is set out in **Mineral Topic Paper 3: Peat Reserves and Supply (Doc Ref SD8c)** - Section 7, *Reserves and Supply*. In order to understand demand, and establish trends, detailed figures of past peat output and current output levels were sought from industry (**Doc Ref SD8c, paragraph 7.4**). Whilst industry has been unable to supply useable data, the County Council has used a variety of information sources to inform calculations, including: the output figures from the Office for National Statistics; data from the Mineral Valuers at the Valuation Office Agency; and primary research involving desk based calculations and site surveys.
- 1.2. Figures obtained from the Mineral Valuer at the Valuation Office Agency and the Office for National Statistics were compared, to check the reliability and consistency of the data – showing a broadly similar decline in sales over the past decade (see Peat Correspondence on Data 2010 to 2013 – **Doc Ref TD46**). Whilst some inaccuracies may arise due to differing conversion factors from tonnes to cubic metres, the figures are considered to be reasonably accurate to provide a picture of the sales trend in Somerset.

- 1.3. The plan indicates that 700,000m³ of peat will be required for the plan period (based on these trends), assuming a gradual decline in sales in line with government targets to zero sales in 2030. Current government policy remains to end the use of peat in horticulture by 2030.
- 1.4. Somerset County Council is of the opinion that this demand, which is reflected in the Plan, is based on the best available evidence.

Question 2

Are there sufficient reserves to meet demand over the Plan period?

SCC Response

- 2.1 Calculations of Somerset's peat reserves are set out in **Mineral Topic Paper 3: Peat Reserves and Supply (Doc Ref SD8c)** - Section 7, *Reserves and Supply*, paragraphs 7.10 to 7.21. This section of SD8c sets out the methodology used to calculate Somerset's reserves, including the desk-based assessment and field surveys. The desk-based assessments were based on sites with planning permission, estimating reserves using geographical and geological data together with assumptions about the way sites are worked.
- 2.2 Field surveys were undertaken to verify accuracy and increase confidence in the estimates of the total volume of saleable peat in the Somerset Levels (see **Peat Site Surveys Summary Report – Doc Ref TD42**). As a result of this, and to ensure the County Council did not overestimate permitted, workable reserves the desk-based calculations which estimated that there was at least 1Mm³ have therefore been reduced by 70%, with the exception of the recently permitted saleable peat reserves at Cradlebridge (415,000m³), as this is the confirmed saleable peat volume ('market weight').
- 2.3 As explained in paragraph 7.19 of SD8c, taking all of this into account, it is estimated that there is at least 700,00m³ of saleable peat remaining – in reality it is assumed that the actual saleable volume of peat remaining in Somerset is likely to be larger.
- 2.4 Somerset County Council's work on peat was presented (via the Topic Paper and related discussions) during a peat workshop in June 2013. As stated in **the Peat Workshop Report – Doc Ref TD41b** "*There was praise for the work done by DCC on the Peat Topic Paper, including the efforts it has made to establish a clear picture.... Initial indications suggest that SPPA are [sic] SCC in broad agreement about peat reserves*".
- 2.4 SD8c also explains (paragraph 7.20) that based on the current average for peat sales between 2007 and 2009 being 72,000m³, if the sales rate falls steadily to zero by 2030 (the final phase out date for peat use in England) less than 700,000m³ of Somerset peat will be needed. This is considered to be an over estimate since amateur gardeners use a larger proportion of peat than the professional horticulturalists. The rate of demand should therefore fall more rapidly to 2020 (see section 3 of **SD8c**), noting the established timeline for the phase-out of peat use for amateur gardeners.

- 2.5 Given estimated reserves in Somerset are a minimum of 700,000m³, the evidence indicates there should be no need for any new reserves to meet predicted demand to be permitted during the plan period of the emerging Somerset Minerals Plan (which will run to 2030). This further supports the County Council's approach to follow the NPPF's direction.

Question 3

Please provide relevant extracts of the Sustainable Growing Media Task Force Report 2012 (with cover sheet). What is the current position relating to the Task Force?

SCC Response

- 3.1 The **Government Response to the Sustainable Growing Media Task Force (Doc Ref TD9)** was published in January 2013. In this Defra endorsed the proposed **Roadmap Towards Sustainable Growing Media (Doc Ref TD17)** and brought the work of the Task Force to a close (it having fulfilled its remit). In its place Defra established a Growing Media Panel (GMP) to oversee and co-ordinate delivery of the roadmap.
- 3.2 In the Government Response to the Sustainable Growing Media Task Force, Defra states that: *"The Panel will be chaired by Dr Alan Knight OBE and its membership will include the current members of the Task Force steering group supplemented with additional members from different parts of the supply chain and society. Actions and projects within the roadmap will each have their own governance arrangements (e.g. Steering Groups or Project Boards) and these will report to the Panel."*
- 3.3 Defra has also published Terms of Reference for the GMP as follows:
- Finalise and adopt the roadmap.
 - Provide oversight on the delivery of the roadmap.
 - Provide high level co-ordination between actions under the roadmap.
 - Report progress annually to Defra Ministers.
 - Provide advice to Government on progress in delivering the roadmap to feed into the policy review in 2015.
- 3.4, The current membership of the GMP is:
- Alan Knight, Chair
 - Matt Sexton, B&Q
 - Wayne Grills, British Association of Landscape Industries (BALI)
 - Catherine Pazderka, British Retail Consortium
 - Judith Stuart, Defra
 - Steve Carter, Fleurie Nurseries and Star Plants Ltd (Grower Representative)
 - Craig Bennett, Friends of the Earth
 - Jamie Robinson, Growing Media Association
 - Anthony Hawkins, Homebase Group
 - Neil Bragg, Horticultural Development Company
 - Raoul Curtis-Machin, Horticultural Trades Association

Chris Hartfield, National Farmers Union
Paul Alexander, Royal Horticultural Society
Nina Sweet, WRAP

- 3.5. In terms of timing, work on responsible sourcing criteria has been undertaken since the beginning of 2012 under the auspices of the Task Force. This work is continuing under the Panel. A large amount of work has been done and it is understood that the Panel are close to having agreed criteria and a scoring system for them. What is still to be determined/agreed is the score (total and by criterion) at which a product would be deemed to be responsible, i.e. the definition of responsible. Also still to be agreed is what is required to prove that the definition is met.
- 3.6. Furthermore, it is understood that the timetable for the proof (that the definition is met) is probably towards the end of 2015 and, according to the roadmap medium term success criterion, within the next 3-5 years audited products (growing media and soil improvers) meeting the threshold for responsible sourcing and manufacturing should be available on the market.
- 3.7. Please refer to Appendix 1 of this document, for relevant extracts from the Task Force report and roadmap.

Question 4

What is the direction of travel of some of the Task Force discussions referred to in the Plan?

SCC Response

- 4.1 The Sustainable Growing Media Task Force was established in June 2011 following the publication of the **Natural Environment White Paper (NEWP), the Natural Choice (Doc Ref NE23)**, to explore how to overcome barriers to further reducing peat use in horticulture. The Task Force adjusted its remit to that of putting the horticultural sector on a long-term sustainable footing by ensuring that all choices of growing media (or substrate) used for amateur gardening and horticulture are sustainable.
- 4.2. This removed the so called 'unfair' targeting of peat and looked to assess all growing media ingredients on the same basis. It was the view of some Task Force members that due to this changed remit peat should not continue to be unfairly singled out. The NPPF policy (**Doc Ref NE3**) was highlighted as an example of where Government was continuing to single out peat.
- 4.3. The Government Response welcomed the approach taken by the Task Force of setting the debate around peat into the wider context of sustainable growing media. It agreed that all materials used in growing media should be assessed against the same sustainability criteria and that the focus should not be limited to the consideration of a single material. It supported the principle of refocusing the targets set out in the NEWP towards promoting sustainable growing media but found it was not possible to do this due to the lack of an agreed definition of sustainable growing media. It committed to review the

situation again as part of the 2015 policy review (second half of 2015). However, in the absence of any change to the policy the commitments made in the Government Response were focused on continued peat reduction.

- 4.4. Defra has been working with the industry to develop a set of criteria and scoring systems which can be used to assess all growing media ingredients. This work does suggest that some sources of peat have less impact on habitat and biodiversity than others; but it does not consider the climate change impacts of extracted peat being oxidised which will not differ significantly by source. However, there is still no agreed definition of sustainable (or responsibly sourced and manufactured) growing media and it is not clear which of the differently sourced peat would meet this definition.
- 4.5. The current Government policy remains that set out in the NEWP, i.e. to end the use of peat in horticulture by 2030.

Question 5

Please provide details of relevant parts of the Government's response to the Task Force (with cover sheet if available).

SCC Response

- 5.1 Please refer to Appendix 2.

Question 6

Should the "Somerset question" be given further consideration and are there any peat resources that could be responsibly sourced? Give details, as appropriate.

SCC Response

- 6.1 This question is read in the context of whether, in the instance of there being demand for peat, it be responsibly resourced from Somerset peat resource areas? Given the current evidence about peat reserves and supply in Somerset, Somerset County Council is of the opinion that there is no evidence of further need for granting planning permission for further peat extraction based on the need for peat. As such, it seems disproportionate, at this point in time to give a great deal of consideration to a question which has been given no weight through government guidance or legislation, or indeed precedence. The planning system naturally provides the flexibility to assess applications under exceptional circumstance.
- 6.2 The Chairman of the Sustainable Growing Media Task Force did not come to any conclusions about the "Somerset question", which looks at whether there may be some sources of peat that "are not caught up in the initial problem (of depleting biodiversity) and deserve bespoke attention and narrative" (**Doc Ref TD17, p 5**). He takes the time to raise the question of whether the "extraction of peat that converts farmland into biodiverse wetlands and other habitats [should] be exempt from the pressure to avoid all peat", and notes that it is

really for the industry to identify the unique and exceptional circumstances that exist and to make and win the case for exemptions.

- 6.3 As the Report suggests, this question does also need to be looked at in the context of other drivers against the use of peat. As identified in the **Natural Environment White Paper (Doc Ref NE23, paragraph 2.63)**, a key commitment of Government is to protect areas of high carbon stock, such as peatland, and “manage our lowland peatlands in a way that supports efforts to tackle climate change”. **The Natural Environment White Paper Implementation Update February 2014 (Doc Ref NE42)**, pursues this commitment to safeguard our soils and confirms the government commitment to reduce peat use to zero by 2030.
- 6.4 The direction of government policy is clear with regards to the further extraction of peat resources, as has been embedded in the NPPF, not only on the question of depleting biodiversity, but also other drivers (such as climate change) against the use of peat.
- 6.5 Although set up by Defra, a key criticism of the Peat Task Group is that it lacks representation from conservation organisations in its membership, e.g. Natural England, RSPB, and Wildlife Trusts. In addition, the NGO conservation organisations represented do not necessarily have expertise in the area of peat.
- 6.6 The Ecologist within the Planning Policy Team at Somerset County Council does not support the statement in the **Sustainable Growing Media Task Force Report (Doc Ref TD17, p 5)**, that “the initial problem is not that of depleting biodiversity...”. There is very little evidence to suggest that the biodiversity value of farmland can be improved by peat extraction on the scale that the industry practices.
- 6.7 Any peat extraction is likely to change farmland, e.g. grassland, once extraction has finished, into ponds and reed beds. Therefore there will be a loss in habitat for grassland species, such as waders and aquatic invertebrates. Ditches outside of the designated site are known to support Ramsar cited aquatic invertebrate species, which often have specific micro habitat requirements, and these populations are likely to recolonize the designated site if for some reason conditions such as flooding cause local extinctions. Although new ponds may benefit some SPA / Ramsar species, such as ducks, loss of grassland will reduce the area available to wintering waders, such as lapwing and golden plover, which are used for roosting and / or feeding.
- 6.8 Any farmland within the peat area is likely to require at least a ‘test of likely significance’ under the Habitats Regulations for potential effects on SPA wintering birds, particularly waders and on aquatic ditch invertebrates under the Ramsar designation. To provide further clarity on this, changes proposed for the Plan include adding an ecological zone of influence to Map 6 (Peat Resource Areas West of Glastonbury) regarding the SPA/Ramsar (**Doc Ref SD6b, 103**). If farmland, once peat has been extracted, is replaced with biodiverse wetland habitats it will mean a permanent loss of wet grassland and ditch habitat. Other habitats are not defined in the Somerset Question, as

defined in the Task Force Report, i.e., “whether the extraction of peat that converts farmland into biodiverse wetlands and other habitats should be exempt from the pressure to avoid all peat” (**Doc Ref TD17, p 5**). Such a reduction in habitat outside the designated site boundaries may cause loss of supporting habitat and the integrity of the SPA/ Ramsar. This leads to significant uncertainty about whether peat could, under certain circumstances, be responsibly resourced.

- 6.9 Outside of the UK peat extraction areas should similarly be undergoing a ‘test of likely significance’ in the EU if designated under the Habitats Directive.
- 6.10 Returning to the Task Force and the Growing Media Panel referenced earlier in this statement, it is noted that Responsible Sourcing Criteria are being developed (see the response to question 4 above) which would appear to negate any reason to discuss the Somerset question.

Question 7

Is Policy SMP6 compliant with Government policy? Explain.

SCC Response

- 7.1 The approach taken is considered to be entirely compliant with the **NPPF (Doc Ref NE3)**. Paragraph 143 of the **NPPF (Doc Ref NE3)** states what is required in preparing Local Plans. Regarding peat, it is noted that: “*local planning authorities... should not identify new sites or extensions to existing sites for peat extraction*”. The Somerset Minerals Plan does not identify new sites or extensions to existing sites for peat extraction, and in a bid not to encourage peat production, Somerset County Council has:
- not carried forward the “Peat Production Zones” that existed within the Minerals Local Plan adopted 2004; and
 - not safeguarded peat resources.
- 7.2 NPPF (Doc Ref NE3) paragraph 143 also states that “*local planning authorities should... put in place policies to ensure worked land is reclaimed at the earliest possible opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place...*” Again SMP6 complies with this approach, particularly read in conjunction with policy DM7.
- 7.3 SMP6 also takes into consideration legal cases in regard to Chat Moss (see **Decision Report, Doc Ref TD10**), support for restoration in the NPPF and also adopted Minerals Plan policy – specifically it is noted that **Greater Manchester’s Mineral Plan adopted April 2014 (Doc Ref TD53)** includes the following policy:

“Policy 7 Peat

Planning permission for peat extraction will only be granted where:

- 1. The site has been previously worked for peat; and**

2. **The removal of peat is physically required to facilitate restoration and only peat physically required to implement that restoration is removed; and**
3. **The site is to be restored to lowland raised bog;”**

- 7.4 Furthermore, quoting from the **Inspector’s Report on the Greater Manchester Plan (Doc Ref TD54)** *“I note the submissions about possible increases to climate change and the shift of demand to overseas peat deposits should the policy remain as drafted, but my concern is the soundness of Plan and I conclude that current Policy 6 is justified, conforms with national policy and so it is sound.”*
- 7.5 There has been some concern about the lack of clarity within **the NPPF (Doc Ref NE3)** regarding the granting of planning permission for the extension of time for peat extraction. The testing of NPPF policy through the Chat Moss planning application and subsequent appeal provides further clarity, as it sets a precedent for the interpretation of this national policy.
- 7.6. The County Council agrees with the Inspector of the Chat Moss appeal that: “the common sense interpretation of the Framework must be that it relates to **physically** new sites or to **physical** extensions of existing sites”; and that it is not referring to time extensions.

Question 8

Is Policy SMP6 deliverable and has it taken sufficient account of viability/economics?

SCC Response

- 8.1 As explained in answer to Question 7, above, Somerset County Council is of the opinion that Policy SMP6 is compliant with Government policy.
- 8.2. Policy SMP6 is deliverable also in the context of implementing government guidance on implementation of the Birds and Habitats Directives, when areas/sites have been designated for their biodiversity independent of any peat permissions previously granted. In such circumstances, when considering how to reduce/avoid impact on the designated areas, government guidance (Doc Ref NE18) identifies that *“an alternative to the existing permission might be agreed by identifying a different area for which planning permission could be given (subject to the normal planning processes and considerations) which would not be damaging to that or any other nature conservation site”*. And prior to agreeing any form of compensation for the permission holder, if revocation of the permission is sought, Defra would need to be satisfied that the Mineral Planning Authority had explored alternatives, including this option. Somerset County Council has received confirmation from Defra that this guidance remains extant (**Doc Refs TD56 and TD57**) and policy SMP6 helps to provide a policy mechanism that is compatible with such considerations.

- 8.3. Somerset County Council believes that consideration of viability and economics should be left to market forces and industry, particularly as they begin to diversify their horticultural growing media businesses in accordance with Government policy and guidance.

Question 9

Overall, is Policy SMP6 justified and does it strike the right balance? Briefly explain.

SCC Response

- 9.1 Somerset County Council believes that Policy SMP6 is justified and strikes the right balance. Somerset County Council's response to Question 7, above, explains why this policy is compliant with national policy. As the Inspector notes, in response to the **Chat Moss appeal (Doc Ref TD10)**: "the common sense interpretation of the Framework must be that it relates to physically new sites or to physical extensions of existing sites"; and that it is not referring to time extensions.
- 9.2 Taking this into consideration, Somerset County Council believe Policy SMP6 strikes the right balance by supporting the reclamation of previously worked sites through providing for the possibility of an exception for planning permission, for a limited time extension. As this policy has progressed through the consultation phases of the Plan, the peat policy has been amended significantly. This is to be clear that the exceptions policy, and the circumstances in which planning permission may be granted (to demonstrate a significant net environmental benefit), will be implemented in response to site monitoring and the ROMP processes. In addition, a separate process will continue for reg 63 sites. This is a provision under Conservation of Habitats and Species Regulations 2010.
- 9.3 Part of the validation checklist at planning application stage, will be a requirement for an environmental assessment – where the applicant would need to clearly demonstrate and evidence net ecological gain.

END

APPENDIX 1

SUSTAINABLE GROWING MEDIA TASK FORCE REPORT (TD17) – EXTRACTS (Based on references made in Mineral Topic Paper 3: Peat Reserves and Supply, SD8c)

Knight, A. (June 2013). *Sustainable Growing Media Task Force: Towards Sustainable Growing Media: Chairman's Report and Roadmap*. Available via: www.defra.gov.uk/publications/2013/01/17/pb13834-sustainable-growing-media [Accessed: 15/03/2013]

Pages 1-2

Four Point Summary

1. The horticulture industry over relies on peat. The more it argues the economic case for peat, the more it exposes the inherent risk in having an industry that is too reliant on peat to compete. It is in the economic interests of the industry to develop more choices and alternatives in the raw materials for growing media.
2. All growing media regardless of origin must be competitive, perform to agreed standards and have proven sustainability credentials. Consensus is needed amongst the key stakeholders on what those credentials are and the degree of third party auditing required to show compliance.
3. The environmental movement needs to restate its rationale for zero peat use in horticulture and be consistent in the delivery of that message, not just across the UK but also across the EU and beyond. It also needs to balance its narrative on peat in horticulture with other uses of peat.
4. Government should continue to show bold leadership on this issue, but should seek ways to, and be seen to, support a prosperous UK horticulture industry that not only uses sustainable growing media but creates a sector that supports Government's wider sustainability and economic ambitions.

Pages 6-7

Can peat be responsibly sourced?

There are some sources of peat that a pragmatist would say are not caught up in the initial problem (of depleting biodiversity) and deserve bespoke attention and narrative. In this Task Force I nicknamed this the "Somerset question" (in reference to the system used in the extraction of Somerset fen peat). By this I mean: should extraction of peat that converts farmland into biodiverse wetlands and other habitats be exempt from the pressure to avoid all peat? The answer depends on what balance you give to the different drivers against peat use, i.e. between the protection of habitat and the protection of carbon sinks and stores. This is a personal judgment and it should be accepted by the industry that whilst it is reasonable for NGOs to provide the ideological framework, the industry itself needs to identify the unique and exceptional circumstances that exist and to make and win the case for exemptions.

The work being undertaken by the European Peat and Growing Media Association in creating standards for harvesting peat demonstrating high levels of environmental and social stewardship suggests that they believe that peat can be responsibly sourced and raises a challenge to environmental groups. Will they concede that this peat is indeed acceptable or will they maintain their stance against the use of such peat on the grounds of carbon? In our discussions with the NGOs within the Task Force, it was clear that whilst the narrative against peat is shifting towards a more global view of natural capital, in practice this does not fundamentally change their views on the need to dramatically reduce, if not phase out, the use of peat in this sector.

However, peat bog protection could also be seen more as a planning issue. If some sites are so special for nature and the environment, then planning restrictions and interventions are surely a more effective way of protecting those specific sites than a broad brush market intervention.

Europe surfaces another paradox in this debate; the pressure to phase out peat use is very UK-centric. It is fair to say that the debate in mainland Europe is significantly different. As companies choose to expand into Europe and beyond and begin to rely on European sources for key raw materials, it is not unreasonable for the sector to hesitate in reacting whilst the arguments pushed forwards by the NGOs vary so much in intensity. If an NGO believes it is unreasonable for Eastern European peat to be used in potted plants sold in the UK, then surely the same pressure should be applied on a potted plant sold in Holland or France.

Fundamentally, environmental groups exist to help us all protect the environment. It is unreasonable to expect any environmental NGO to support the harvesting of either a carbon store or a natural habitat, although a more consistent approach across Europe would help. The question, however, is not one for NGOs to change their stance, but for the industry on how much the underlying issues highlighted by environmental campaigns will ultimately lead to severe commercial risk. The more the industry argues the case for peat, the more I realise they need alternatives to choose from. To stretch an Oscar Wilde quote, "there is only one thing worse than not using peat in our sector and that is over-relying on peat in our sector".

Pages 21-23

Part 3: Roadmap

Below is a draft roadmap that has been created through individual conversations and a Task Force meeting in May. It illustrates that the proposals I make in this report can be converted into a roadmap and builds on Parts 1 and 2 of this report. I invite feedback on these milestones and the best form of governance/oversight and co-ordination to facilitate their achievement. I would also welcome additional commitments and actions from individuals and organisations to add to the roadmap.

Performance standard

Goal: All growing media is fit for purpose.

Year 1	<ul style="list-style-type: none"> • Testing protocol and audit protocol developed by the Growing Media Association for multi-purpose compost • First product testing against protocols completed
Year 2	<ul style="list-style-type: none"> • Retailer and stakeholder buy-in obtained • Implementation of scheme by growing media manufacturers
Years 3-5	<ul style="list-style-type: none"> • Products appear on market that have been audited as meeting the standard • Choice editing by retailers to ensure that the default choice is products meeting the performance standard • Review performance of scheme • Integrate with the responsible sourcing and manufacturing standard • Identify other types of growing media for which a performance standard is required
Years 6-10	<ul style="list-style-type: none"> • Other performance standards developed and implemented

Success criteria (medium-term): In the next 3-5 years the majority of multi-purpose compost sold in England should demonstrably meet the performance standard.

Responsible sourcing and manufacturing standard

Goal: All growing media and soil improvers should be made from raw materials that are environmentally and socially responsibly sourced and manufactured.

Year 1	<ul style="list-style-type: none"> • Task Force sub-group completes its development of the initial criteria set • Methodology for assessing mixtures rather than individual ingredients developed • Engagement with NGO community • Launch scheme (concept)
Year 2	<ul style="list-style-type: none"> • Ownership of the criteria set taken over by Growing Media Association and Growing Media Initiative • Scheme developed and tested by GMA and GMI • Consultation and buy-in from NGOs, retailers and other stakeholders • Agreement of the 'promise' • Benchmark of current products against the criteria
Years 3-5	<ul style="list-style-type: none"> • Threshold for responsible sourcing and manufacturing established • Audit arrangements developed and agreed

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	<ul style="list-style-type: none"> • First products in market • Integrate with the performance standard • Audited products available on the market
Years 6-10	<ul style="list-style-type: none"> • Introduction of standard into customer standards • Choice editing by retailers to ensure that the default choice is products meeting the responsible sourcing and manufacturing standard • Review performance of scheme • Extend scheme, promise and criteria from beyond the end of the mixing belt to its use in commercial horticultural systems

Success criteria (medium-term): Within the next 3-5 years audited products (growing media and soil improvers) meeting the threshold for responsible sourcing and manufacturing should be available on the market.

Commercial horticulture

Goal: Commercial horticulture uses only responsibly sourced and manufactured growing media.

Year 1	<ul style="list-style-type: none"> • Establish current data on the use of peat within different sectors of the industry • Promote success stories • Review the pros and cons of different alternatives
Year 2	<ul style="list-style-type: none"> • Principle component analysis of current growing media to identify and describe the properties that are vital to commercial growers and that need to be replicated by sustainable growing media for each sector. • Commencement of commercial scale demonstrations of sustainable growing media (with funding sourced). • Knowledge transfer of existing and developing knowledge • Changing customer and retailer expectations
Years 3-5	<ul style="list-style-type: none"> • Pull through (demand) from retailers • Overcome risks to commercial growers • Continuation of commercial scale demonstrations and research
Years 6-10	<ul style="list-style-type: none"> • Commercial horticulture increases its use of responsibly sourced and manufactured growing media

Success criteria (medium-term): The establishment of a two to five year programme supported by both Defra and the industry to create commercial scale demonstrations together with knowledge transfer within the industry.

Choice editing

Goal: Retailers only stock products which meet the performance standard and responsible sourcing and manufacturing standard.

Year 1	<ul style="list-style-type: none"> • Retailers make public commitment to only sell sustainable growing media (by 2020 or earlier)
Year 2	<ul style="list-style-type: none"> • Retailers begin working with growers to identify how to bring through plants and food products which are grown in sustainable growing media
Years	<ul style="list-style-type: none"> • Choice editing by retailers to ensure that the default choice is products

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3-5	meeting the performance standard
Years 6-10	<ul style="list-style-type: none"> • Choice editing by retailers to ensure that the default choice is growing products meeting the responsible sourcing and manufacturing standard • Choice editing by retailers to ensure that the default choice (where feasible) is plants and food products which have been grown in sustainable growing media

Success criteria (medium-term): In the next two years, the majority of growing media retailers have made a public commitment to only sell products which meet the responsible sourcing and manufacturing standard.

Public sector procurement

Goal: All public sector procurement includes a requirement to source plants and products that have been grown in sustainable growing media.

Year 1	<ul style="list-style-type: none"> • Defra works with central and local government and growers to identify opportunities for promoting the use of peat alternatives in public procurement
Year 2	<ul style="list-style-type: none"> • Case studies identified or set up to promote positive examples of a move towards sustainable growing media in the public sector
Years 3-5	<ul style="list-style-type: none"> • Central Government becomes an early adopter of the responsible sourcing and manufacturing standard in relation to its procurement

Success criteria (medium-term): Within two years, positive examples of leadership by the public sector in moving towards sustainable growing media have been developed through a partnership approach.

Consumer education on use of growing media

Goal: Consumers can make informed choices in their purchase of growing media (and soil improvers) and are confident in how to get the best performance out of them.

Year 1	<ul style="list-style-type: none"> • Manufacturers and retailers work together to ensure consumers have the information at the point of sale on how to use different growing media to meet their needs
Year 2	<ul style="list-style-type: none"> • Labelling protocol agreed between retailers and manufacturers

Success criteria (medium-term): Within two years, the majority of customers feel they understand how to use the growing media they have purchased effectively.

Improving confidence in the use of green waste

Goal: Improved confidence in the use of green waste such that it is able to fulfil its maximum potential in the growing media market (estimated to be around 20% of the market).

Year 1	<ul style="list-style-type: none"> • Association for Organics Recycling (AfOR) 'Feedstock Contamination' Special Interest Group continues to work with composters, Local Authorities and other important stakeholders to improve understanding of issues affecting the quality of feedstocks and how these impact upon green compost • Investigative research on the impact of herbicide residues in compost
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	<p>completed and recommendations set out</p> <ul style="list-style-type: none"> • Completion of an investigation project looking at the main technical issues identified by the Task Force
Year 2	<ul style="list-style-type: none"> • Updates of WRAP's Guidelines for the Specification of Quality Compost for use in Growing Media, 2011 and accompanying Compost Production for use in Growing Media – a Good Practice Guide, 2011 • Further research needs on specific issues associated with green compost identified • Signposting of existing evidence and education of the horticulture industry about perceived issues and further planned work on any remaining issues in place

Success criteria (medium-term): Within 3-5 years, the number of growing media producers successfully incorporating green compost into their products has significantly increased.

Sourcing of materials

Goal: The waste regime is no longer a barrier to the sourcing of high quality waste derived materials for use in growing media and horticultural soil improvers.

Year 1	<ul style="list-style-type: none"> • The Environment Agency and growing media manufacturers work together to develop a way forward
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Success criteria (medium-term): In the next year, the Environment Agency and growing media manufacturers agree a specific action plan for overcoming this barrier.

A voluntary approach

Goal: A voluntary approach successfully delivers a transition to sustainable growing media within the horticultural sector.

Year 1	<ul style="list-style-type: none"> • Retailers, manufacturers and growers commit to taking specific actions • Defra produces a Government response to the Task Force report
Year 1 onwards	<ul style="list-style-type: none"> • Actions in this roadmap are achieved successfully

Success criteria (medium-term): Within a year, the majority of the growing media supply chain has volunteered for one or more actions within this roadmap.

APPENDIX 2

GOVERNMENT RESPONSE TO SUSTAINABLE GROWING MEDIA TASK FORCE REPORT (TD9) – EXTRACTS (Based on references made in Mineral Topic Paper 3: Peat Reserves and Supply, SD8c)

Knight, A. (June 2013). *Sustainable Growing Media Task Force: Towards Sustainable Growing Media: Chairman's Report and Roadmap*. Available via: www.defra.gov.uk/publications/2013/01/17/pb13834-sustainable-growing-media [Accessed: 15/03/2013]

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Policy review

The policy review will provide the next formal opportunity for revisiting the targets. The main focus of the review will be assessing the delivery of the roadmap and the further actions necessary to achieve a transition to sustainable growing media and reduce peat use. We believe that two years should allow sufficient time for an agreed roadmap (currently only published in draft) to have an impact before progress is formally assessed. Allowing for data collection prior to the review, the review will take place in the second half of 2015.

Progress will be assessed against the goals and medium-term success criteria set out in the draft roadmap (see Annex 1), which we fully endorse. The delivery of specific actions behind these goals will also need to be assessed.

Achievement of the roadmap will be the ultimate measure of success in 2015. Other streams of evidence which will feed into the review are:

- Volumes of different materials used within growing media sold in the UK. This will come from new annual monitoring jointly funded by the Horticultural Development Company and Defra in conjunction with the Growing Media Association and the Horticultural Trades Association, which started in September 2012.
- Degree of transformation of the supply chain as measured by the projected availability of different growing media ingredients. In 2009 Defra funded research on the availability and supply of alternative materials for use in growing media to

assess the future availability of these materials². Defra will fund a repeat of this research at the beginning of 2015³.

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Roadmap oversight and governance

We believe that the Sustainable Growing Media Task Force has fulfilled its remit. We would like to thank all members of the Task Force for their work in moving the debate forward and in developing the roadmap and new initiatives, such as the performance standard and the emerging criteria for assessing responsible growing media.

As we move into the next phase of activity, delivering the roadmap, we believe that a new slimline governance and oversight arrangement better fits requirements. We need a group that can oversee and co-ordinate delivery of the roadmap and report on progress. Therefore we are bringing the Sustainable Growing Media Task Force to a close and establishing a new smaller Growing Media Panel.

The Panel will be chaired by Dr Alan Knight OBE and its membership will include the current members of the Task Force steering group supplemented with additional members from different parts of the supply chain and society. Actions and projects within the roadmap will each have their own governance arrangements (e.g. Steering Groups or Project Boards) and these will report to the Panel.

Box 1: Growing Media Panel Terms of Reference

- Finalise and adopt the roadmap.
- Provide oversight on the delivery of the roadmap.
- Provide high level co-ordination between actions under the roadmap.
- Report progress annually to Defra Ministers.
- Provide advice to Government on progress in delivering the roadmap to feed into the policy review in 2015.

In addition, Defra will host an annual industry meeting to facilitate the wider co-ordination of activities across the sector and allow the industry as a whole to take stock of progress. The first such meeting will take place in September 2013.

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Chapter 4 Task Force consensus points

Part 2 of the Task Force report set out the emerging messages and observations arising from the work of the Task Force. These were presented as a series of 'consensus points'. This chapter sets out the Government response to each of the consensus points.

Consensus point	Government response
1. All growing media must be fit for purpose	We agree that all growing media must be fit for purpose and believe that the performance standard is a key tool for increasing consumer and retailer confidence in growing media.
2. Preference for peat is based on performance and price and not ideology	We welcome this consensus point.
3. The transition to sustainable growing media needs to be economically viable	We agree that the transition to sustainable growing media must be economically viable and believe that the move towards sustainable growing media is about doing things that are good for business.
4. All growing media should be made from raw materials that are environmentally and socially responsibly sourced and manufactured	We agree with this and believe that the responsible sourcing and manufacturing criteria work is a flagship output of the Task Force. We would encourage the supply chain to continue to develop and embrace this work.
5. The horticultural sector in 2030 will have undergone other transformations, as will society	We agree that changes in growing media and the supply chain need to be resilient to and compatible with other changes in society over the next 18 years and we will continue to share the outputs of our horizon scanning programme.
6. Removal of all peat from commercial horticulture will be very challenging and targeted action is required	We recognise the challenge and agree the need for targeted action where it is most likely to make a difference. The sector as a whole should continue to minimise its use of peat and to make the transition to sustainable growing media where possible. Innovations in growing media and growing systems over the next 18 years may make it possible to grow more plants commercially in peat free/sustainable growing media based systems than is currently possible.

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Consensus point	Government response
12. Extraction of peat for horticulture is only one of the pressures facing peatlands in England	We acknowledge that extraction of peat for horticulture is only one of the pressures facing peatlands in England. Extraction of peat for other uses in England is not significant ¹⁰ , but the use of peatlands for agriculture leads to their degradation. The Government is taking a wide range of actions to protect and enhance England's peatlands. Government provides protection for peatland habitats through statutory area designations as well as providing specific incentives for peat restoration through agri-environment schemes. We are also investing in research to improve our understanding of how to manage lowland peatlands for the best greenhouse gas outcome.
13. Labelling should help the consumer make a choice and not confuse them	We agree that labelling should help consumers make a choice and would encourage the industry to take a more consistent approach to labelling and language choice. Early consideration should be given to the work being undertaken by the European Commission to harmonise labelling of growing media under the revision of the EU Fertiliser Regulations 2003 so that effort is not duplicated.
14. Improving confidence in the use of green waste requires improved collection, segregation and sourcing of green waste	We agree that confidence in the use of compost in growing media needs to be improved. The specification for compost (PAS 100) was tightened in 2011; reducing allowable physical contaminants in response to market concerns. AFOR - the certification body for PAS 100 - will continue to work with operators and Local Authorities to ensure confidence in the specification. WRAP are commissioning work to 'demystify' the use of composts in growing media. This will include liaison with commercial growing media manufacturers as well as users. This work may lead to changes to the specification for the use of compost in growing media and the related best practice guide.
15. The waste regime is currently a barrier to the sourcing of materials	We recognise the burden of regulating some growing media ingredients as waste and the concern within the industry of how to achieve end of waste status. Government is committed to working with the industry and the action we will take is set out in chapter 2.

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Consensus point	Government response
16. A voluntary approach will only work if people choose to take part	We agree with this and call for volunteers to take action to deliver the roadmap.
17. Monitoring of progress needs to consider more than only changes in the volumes of materials used, and this should be reflected in the 2015 policy review	We agree that success needs to be judged on more than the volumes of each material used and, as set out in chapter 1, the ultimate measure of success in 2015 (the policy review) will be based on achievement of the roadmap.