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Teresa Dent CBE
Chief Executive
Game & Wildlife Conservation Trust

22nd August 2022

Dear Teresa,

Peatland and heather burning

I write in response to your letter received on 22nd June 2022 with regard to our recent work about heather burning on English peatlands.

The UK's peatlands are of global importance, but the vast majority of these habitats have already been lost or damaged. It is vital to protect what is left and restore as much as possible.

We do not oppose scientifically led land management. The weight of scientific evidence shows heather burning - in particular - is damaging to English peatlands, and to the important functions this peatland provides, delivering significant benefits to biodiversity and human society. The policy priority is restoration, and evidence strongly indicates that such burning makes it challenging to restore these habitats to a more biodiverse and ecologically valuable ecosystem.

This is evident from the work of a range of independent and evidence based organisations, such as the UK's Climate Change Committee, the International Union for the Conservation of Nature, and Natural England. I have appended below some of the quotes from their, and other, work.

Both Natural England and the Climate Change Committee (CCC) have arrived at the conclusion that restoring England's peatlands is essential if the UK is to meet its legally binding target to cut carbon emissions to net zero by 2050. In June the CCC reiterated this to government in its statutory report, which recommended an immediate end to rotational burning. Leading scientists whose work we have read, or who we have spoken with directly and in detail, support these conclusions.

We therefore believe that our work reflects the weight of independent science and evidence based institutions.

Thank you for your engagement with our work and for the information you sent us.

Yours sincerely,

Pat Venditti
Interim Executive Director, Greenpeace UK

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Appendix - selection of quotes from independent organisations on the deliberate burning of peatland in UK and its impact

Natural England: "While there continues to be scientific debate over aspects of the environmental impact of managed burning, there is a large and increasing body of literature that provides evidence that overall managed burning is damaging to peatland."

IUCN: "The current body of available scientific evidence indicates that burning on peatland can result in damage to peatland species, microtopography and wider peatland habitat, peat soils and peatland ecosystem functions."

Climate Change Committee: Ban rotational burning in the UK in 2020. This includes burning for grouse shooting….It is highly damaging to the peat, and to the range of environmental benefits that well-functioning peat can deliver (e.g. water quality, biodiversity and carbon sequestration). A voluntary cessation of this activity by landowners has not produced the desired outcome so the practice should be banned across the UK with immediate effect. The adoption of more sustainable practices to manage the vegetation (e.g. heather cutting) would still allow grouse shooting to continue on peat soils, while the burning of heather could continue on mineral soils.

Climate Change Committee: "Introduce policy to end rotational burning on peatland before the start of the 2022 burn season."

DEFRA: "There is a consensus that burning of vegetation on blanket bog is damaging to peatland formation and habitat condition. It makes it more difficult or impossible to restore these habitats to their natural state and to restore their hydrology."

Professor Joseph Holden, Proof of Evidence from the Walshaw Moor Public Inquiry
"Encouragement of heather growth (e.g. by prescribed burning) is likely to encourage pipe development leading to greater erosion and drying….Several companies are examining how to reduce piping in blanket peatlands. Burning also temporarily removes vegetation cover making the surface layer more susceptible to weathering, rapid overland flow and sediment loss. Water flowing from peat flushes out carbon and discolours water causing an expensive problem for water companies. My recent review of available scientific evidence on prescribed moorland burning and water colour enables me to conclude that the balance of evidence suggests burning does cause increased discolouration of streamwaters flowing from peatland sites"

"The macroinvertebrate community composition is significantly different in streams downstream from both drained and burnt peatlands relative to the composition downstream from less disturbed peatlands. Data suggest that peat sediment release into rivers on burnt and drained sites is partly responsible for altering the aquatic ecology."

"The vegetation on deep blanket bog is being burned. It should not be burned. Where it is to be burned it must be in line with a management plan agreed with Natural England."

"Unfortunately, many of these were damaged by recent burning. If the area to be burnt extends to areas that have previously not been regularly burnt then I would expect changes in the natural hydrology, a deterioration of water quality downstream, damage to aquatic ecosystems and increased carbon loss and discolouration of river water. I would expect existing burn rotation areas to also have this effect. If the area or intensity of burning increases then cumulative downstream effects will be greater."