

The Rt Hon Michael Gove MP  
Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

4<sup>th</sup> April 2019

Dear Secretary of State,

**Banning burning of upland peatlands in England to protect carbon stores, wildlife and communities**

As a mixed group of charities, academics and local campaigners with a track record of working on peatland conservation, we urge you to implement a complete ban on the practice of burning on precious peatland habitats in our uplands, both inside and outside designated sites.

England's upland blanket bogs are globally rare ecosystems, protected under UK and European law. Blanket bog is vital in the fight against climate breakdown: the habitat's deep peat soils lock up billions of tonnes of carbon. Covering hundreds of thousands of hectares, our uplands ought to be a haven for nature and wildlife.

And yet for decades, some moorland owners and tenants have damaged these sensitive habitats, subjecting them to intensive management practices for the purpose of maximising the number of grouse for shooting.

The evidence shows that burning blanket bog dries out the underlying peat soil and damages the ecosystem, releasing climate-changing carbon into the atmosphere. The poor condition of upland blanket bogs in England releases 350,000 tonnes CO<sub>2</sub> to the atmosphere each year, with three quarters of this a direct result of burning vegetation on peatlands.

Degraded blanket bog is also less able to slow the flow of water across the bog surface, leading to heavier floods after torrential rainfall, affecting communities downstream of the moors. Similarly, desiccated and damaged blanket bogs are less able to withstand worsening heatwaves, reducing resilience in the face of increased wildfire risk, with unknown impacts on local air quality in our northern towns and cities. Continuing the outmoded practice of burning peatland habitats in our dangerously warming 21<sup>st</sup> century world is inappropriate and reckless, and will make legally binding climate change targets much harder to reach.

Last year, you took the bold step to end rotational burning on protected blanket bog by June 2019, and brokered a voluntary agreement with landowners in an effort to do so. It is now clear that landowners are not abiding by this voluntary deal. Investigations by Friends of the

Earth, the RSPB and local residents' groups, as reported by BBC Countryfile and elsewhere, show that grouse moor managers have continued to burn on protected blanket bog, with some estates seemingly burning in breach of their voluntary commitments. We understand Natural England is continuing to investigate these reports, as part of its response to ongoing European Commission infraction proceedings.

Some now tout the concept of 'restoration burning', in order to continue moorland burning practices in the name of wildfire management – a practice still permitted under Natural England's most recent position statement. In truth, there is no evidence that burning on blanket bog reduces fire risk or aids bog restoration, compared to alternatives such as cutting. Indeed, Natural England's own Protocol for Upland Peatland Monitoring admits that the evidence base for burning for restoration purposes is limited, against a strong evidence base that burning hinders restoration efforts. What is needed instead is a concerted programme to re-wet blanket bog across the UK. Healthy blanket bog needs water, not fire.

We therefore urge you to implement an immediate and outright ban on burning, across all blanket bog habitats, not just those in designated sites. Such a move would make a significant contribution to our fight against runaway climate change, and increase the resilience of these habitats, and all that they can provide for people and wildlife.

Yours sincerely,

Mike Clarke, Chief Executive, Royal Society for the Protection of Birds

Stephanie Hilborne, Chief Executive, The Royal Society of Wildlife Trusts

Patrick Begg, Outdoor and Natural Resources Director, National Trust

Crispin Truman, Chief Executive, Campaign to Protect Rural England

Dr Ben Clutterbuck, Senior Lecturer, Nottingham Trent University

Craig Macadam, Conservation Director, Buglife

Jenny Shepherd, Ban the Burn Campaign (Hebden Bridge)

Julie Williams, Chief Executive Officer, Butterfly Conservation

Craig Bennett, Chief Executive, Friends of the Earth

Richard Lindsay, Head of Environmental and Conservation Research, UEL

Rebecca Wrigley, Chief Executive, Rewilding Britain

Dongria Kondh, Treesponsibility (Climate Action in Calderdale)

Michael Krause, Acting Chief Executive, Plantlife