

CONSULTATION

Response Document



Scotland's Peatland Standard Draft

NatureScot

28th August 2026

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 9,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching / research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Society for the Environment
- United Nations Decade of Restoration 2021-2030 Network
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has over 890 members in Scotland who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by Members of our [Scotland Policy Group](#).

Navigation

How clear is the purpose and scope of Scotland's Peatland Standard?

Very clear

Acceptable

Neutral

Needs work

Not clear

Please use this space for any other feedback you want to provide regarding the navigation.

It would be helpful for the document to state explicitly why a standard is needed (for example, at 1-2). While we assume the standard is intended to address concerns about inconsistent application of peatland management and restoration, and the risk of intact peatland not being adequately protected, this reasoning isn't made explicit. It would also help to clarify what "standard" means in this context, for example, does it delineate a pass / fail threshold, a minimum expectation with room for exceeding it, or something else? The term "standard" is used in several different ways across policy documents, and this Standard would benefit from defining its own usage up front.

The document reads more as a collated guidance document than a "standard" in the sense of setting a defined level of excellence to be met. We would ask NatureScot to clarify what standard of achievement the document is intended to set. We also suggest testing the document with non-specialists to see which parts they find hard to follow or apply since a document written by and for experts can be difficult for a universal audience to use.

How accessible is the overall structure and presentation of Scotland's Peatland Standard?

Very accessible

Acceptable

Neutral

Needs work

Not accessible

Please use this space to provide any further feedback on the accessibility, structure and presentation of Scotland's Peatland Standard.

While the protect, manage, restore framing aligns well with the mitigation hierarchy, the overall structure is difficult to navigate. The framework, organised first around the three pathways (protect, manage, restore) and then around activities and objectives within each, is not intuitive, and it is hard to locate the requirement you need without already knowing which pathway and chapter it sits under. We would welcome a clearer front-end index or decision tree to help users find the right section quickly; this could be included in the “How To Use Scotland’s Peatland Standard” section of the Standard with hyperlinks to the relevant later sections.

We would also note that the document is generally easy to follow for readers with existing peatland knowledge and restoration / management experience, but less explicit or accessible for those without this background. We suggest adding a statement, for example in Chapter 1 or Chapter 5, that for any project, scheme or works where changes to peatland condition are being considered, advice should be sought from, and followed by, someone with appropriate and demonstrable experience of the type of work involved.

Several of our members who expect to use the document in their work observed that while the document contains a wealth of valuable information, summaries at the start of each section and diagrams, for example in Chapter 4 and Annex G, could help them to navigate the content.

Ambition

Are the objectives for the three activity pathways (protection, management and restoration) capturing the ambition for caring for Scotland's peatlands?

Yes

Partially

No

Please use this space to provide any additional feedback on the objectives for the three activity pathways.

Some of our members consider that the objectives are framed mainly around landowners and land managers, but the Standard should be designed to be useful to everyone who interacts with peatland decisions, including renewable energy developers and planners. As drafted, there is a risk that the pathway structure creates a perverse incentive: a landowner has little clear reason to choose the restoration pathway over the less onerous protect-and-manage route. Similarly, it's unclear how a developer would be encouraged to go beyond the minimum-intervention pathway to "do as little as possible," or how a mixed approach (combining protection, restoration, and management) within a single site or project would actually work in practice.

Others feel that if the Principles are followed thoroughly, they do provide developers — who are often changing peatland condition at significant scale — with a workable route through the same framework.

To address these points, we would recommend the Standard make the applicability of the pathway structure and Principles to developers more explicit, so this isn't left to interpretation. This should be achieved through guidance on pathway selection which outlines the circumstances that should trigger a move to restoration, and how mixed-pathway sites should be assessed and reported.

We have specific concerns about the Success Indicators set out in Chapter 3 for all three pathways (3-9 Protection, 3-12 Management, 3-15 Restoration). Many of the listed indicators — for example, naturalness of erosion, peat biochemical function, and identifying erosion triggers — are difficult, costly and slow to measure, and some (such as distinguishing natural from historical human-caused erosion, including from peat pipes or past burning events) may not be reliably assessable at all with current methods. We recommend the Standard provide clearer guidance on practical, lower-cost proxy indicators that can signal whether an indicator is trending in the right or wrong direction, rather than only listing the ideal (but often impractical) indicator.

Monitoring, including of proxy indicators, can be facilitated efficiently using evolving technologies and methods such as use of drones and satellite mapping of, for example, self-seeding of non-native conifers, peatland condition over large areas¹, wildfire spread², etc. At CIEEM's Scotland Conference 2026, we expect to hear of an innovative approach, taken by ScottishPower Renewables, that combines very high-resolution tri-stereo satellite imagery with machine learning to detect, map and quantify invasive conifers across entire peatland landscapes. Where remote monitoring finds that progress isn't being made, as expected, ground truthing should be conducted with surveys to establish the causes. Such techniques will require the standard or accompanying guidance to be reviewed and updated suitably frequently to keep up with advances.

We also found the distinction between the Management and Restoration pathways unclear (3-12 to 3-13). The examples given suggest Management covers only slight improvement (e.g. addressing overgrazing), but it is not clear how, for example, a peatland under a forestry plantation could be "managed" to a meaningfully better state while the trees causing the damage remain in place. In our view, such cases would need to be a Restoration

¹<https://www.nwh.uhi.ac.uk/en/news/scotland-leads-the-way-in-mapping-peatland-health-with-new-satellite-based-tools.html>

² https://www.linkedin.com/posts/jamesbunyan_cairngorms-wildfire-copernicus-ugcPost-7493772323989250048-Q73a/?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAm2dfgBf5uOH5S11Z91PIdODIB-TQkl1Vk

case rather than Management. We would welcome clearer worked examples distinguishing the two pathways for cases like this.

More generally, we found the structure of Chapter 3 difficult to follow, and would welcome a clearer layout distinguishing objectives, outcomes and success indicators for each pathway.

Does the Standard provide the technical information and mechanisms to work to the standards described and support continual improvement? (all chapters)

Yes

Partially

No

Please use this space for any other feedback you want to provide regarding the ambition of the Standard providing the technical information and mechanisms to work to the standards described and support continual improvement?

The Standard lists the various definitions of “deep peat” ranging from 30cm to 50 cm depth, but does not provide a definitive stance on these (Annex D, D-1, p.83). This definitional inconsistency starts earlier than Annex D: the Standard does not define peat up front in Chapter 1, and different depth thresholds are used in different places without explanation, e.g. the Wildlife Management and Muirburn (Scotland) Act 2024 definition used at 7-9 is >40cm, while other parts of the Standard use 50cm or (via the UK Forestry Standard) 30cm. We recommend a single clear definition of peat and peatland be given early in the document (Chapter 1), explicitly noting how it relates to the different statutory thresholds used elsewhere, and explicitly stating whether the Standard applies to peatland that has been improved to grassland or cropland. We would also caution against settling on a single higher threshold (e.g. 50cm) as the "official" definition, since a significant amount of shallower peat is equally important to conserve and restore, and a high bar risks placing it

outside the Standard's scope. For reference, [CIEEM's good practice guidance for bogs](#) adopts the UKHab definition of deep peat on blanket bogs as being >30cm.

Does Scotland's Peatland Standard provide a technical framework for leadership in caring for peatlands? (all chapters)

The Standard is technically thorough, but its ambition to provide sector leadership would be strengthened by a clearer focus on improving consistency of practice across sectors, so that all users, regardless of sector, are working from the same core principles. At present the technical depth is not matched by consistent cross-sector applicability.

Please use this space for any other feedback you want to provide regarding the ambition of the Standard providing leadership in caring for peatlands in a technical sense?

One barrier to the Standard providing strong sector leadership is inconsistency in how firmly its requirements are worded. For example, 5-5 / 5-6 states that Essential Good Practice Requirements "should be applied," but then only "recommends" that reasoning be recorded where they are not. This reads as two different strengths of instruction within the same requirement. Similar inconsistency recurs later in the document (see our comments on Chapter 7 and the Principles (Chapter 4), e.g. use of "have regard to," "consider," "could," and "should" interchangeably in places that otherwise read as instructional). We recommend NatureScot review the document for consistent use of mandatory language (e.g. "must," "should comply with") versus advisory language ("should consider," "may"), so that users can reliably distinguish binding expectations from optional good practice.

Adding value

Do the seven Universal Principles and six Activity Pathway Specific Principles provide an effective way to help decision making in achieving the objectives of each activity pathway (Chapter 4)?

Yes

Partially

No

Please use this space to tell us if there is another mechanism that Scotland's Peatland Standard could use to do this?

Partially. Not all of the principles are equally workable in practice. The "enough and no more" principle in particular is too vague to apply operationally; it is unclear what evidence or threshold a planner or decision-maker would use to enforce it.

The hydrology principle can be challenging to apply consistently: working within full hydrological units is sometimes achievable for developers, particularly where the landowner's holding is large relative to the development (e.g. wind farm sites). However, some members report having to actively make the case for this rather than it being an expected approach. We recommend the standard explicitly encourage this kind of collaborative, catchment-scale working between developers and landowners, rather than leaving it to be negotiated case-by-case. Where practitioners are working within a fixed development footprint (e.g. infrastructure or renewables projects) and are unavoidably constrained from taking a full-catchment hydrological view, this standard should support them to assess and, where possible, mitigate against impacts to the water table.

Annex C provides a much more detailed explanation of each Principle, and should be presented as essential reading alongside Chapter 4. It also resolves some of the ambiguity we raise. However, this is not made clear enough in the main text: 4-2 mentions Annex C only in passing, and this reference should be far more prominent, ideally with key clarifying

content brought into the main chapter rather than left in an annex that some users may not think to check.

Several of the individual Principles use vague qualifying words that make them hard to apply or enforce consistently. In Table 3, Principle 4 ("minimise disturbance") and Principle 6 ("reduce or remove all significant threats") do not specify a threshold, so "reduce" could mean anything from a token reduction to a substantial one and still technically comply. Principle 2 ("consider the impact of activities on a short- and long-term basis") only requires that impact be considered, with no requirement to then act on that consideration. In Table 4, Principle 9 ("maintain or improve peatland functions") and Principle 13 ("achieve optimal recovery") raise similar concerns — "improve" and "optimal" are not defined or bounded. We recommend each of these Principles be paired with a clearer statement of the evidence or threshold expected, drawing on the fuller explanations already in Annex C.

We recommend each principle be accompanied by practical guidance on how their application should be evidenced and enforced by different types of user.

Are the requirements for Protection in the Standard complete and proportionate (Chapter 6)?

1-incomplete

2

3

4

5-complete

Please use this space to explain why you gave this rating.

The UK Forestry Standard's approach (referenced at 6-12) is a useful comparator: it avoids new woodland planting on peat deeper than 50cm but also requires careful consideration before planting on peat 30–50cm deep. We recommend Scotland's Peatland Standard adopt the same precautionary approach and extend its protection requirements to cover all peat greater than 30cm deep, not only deep peat (>50cm). This is justified by the carbon content of shallower peat (also reflected in the carbon-rich soils protections referenced at 6-17 and

in the Peatlands and Woodland Creation legal requirements), by its habitat value, and by the practical reality that shallower peat is often found in a mosaic with deeper peat, meaning small pockets cannot always be planted or developed without affecting the deeper peat around them. We recognise this may not be appropriate in every location, but the Standard's default position should be precautionary.

Are the requirements for Management in the Standard complete and proportionate (Chapter 7)?

- 1-incomplete
- 2
- 3
- 4
- 5-complete

Please use this space to explain why you gave this rating.

We have a number of specific comments on Chapter 7:

- Fens (7.7) are introduced without prior context (in a bullet point on winter grazing) despite not having been discussed earlier in the chapter. Fens are defined in the glossary (Annex A), but it should be made clear in the main text of Chapter 7 whether and how fens are covered by this chapter's requirements, given they are a distinct peatland type from bog.
- Inconsistent peat depth definition (7-9): peatland is defined here as being >40cm deep (via the Wildlife Management and Muirburn (Scotland) Act 2024) — see our comment above on the need for a single, clearly explained definition of peat depth early in the document.
- Weak / inconsistent wording (7-10): "have regard to" is a notably weaker instruction than the "must" / "should comply with" language used elsewhere in the chapter. If this is intended to be an obligation, it should say so clearly.
- Weak wording (7-16): "consider a landscape scale approach" should be strengthened to, for example, "adopt a landscape scale approach as a priority", given this already

reads as best practice advice. Similarly, deer culling is described as something that "could" be considered, but if a cull may be necessary to prevent ongoing damage, this should be "should," not "could."

- Undefined technical term (7-30 / 7.31): "acrotelm" is used without definition and would benefit from a footnote or cross-reference to the glossary / Annex. The same section also uses "limiting" and "minimising," which, as noted above regarding the Principles, are too weak for content that is presented as essential good practice.

We highlight some minor drafting errors: the Farm Advisory Service reference (in the grazing and agriculture section, just before 7-8) reads "information of protecting peatlands" and should read "information on protecting peatlands"; similarly, 7-8 reads "information of how to manage peatland vegetation with muirburn" and should read "information on...". At 7-20, bullet 5 repeats "to prevent" twice.

Are the requirements for Restoration in the Standard complete and proportionate (Chapter 8)?

1-incomplete

2

3

4

5-complete

Please use this space to explain why you gave this rating.

The standard states that the restoration sector is still relatively young, so much of the essential good practice and guidance here reflects practitioners' expert judgement rather than published, peer-reviewed evidence. We feel that though there may be a lack of relevant formal published literature, there is considerable experience of restoration. In particular, we would like to draw your attention to the [bogs chapter](#) of the rebuilding nature series coordinated by CIEEM, which draws on experience in the UK and the island of Ireland.

Comments on specific restoration requirements:

- Scotland's Peatland Standard's Glossary (Annex A) distinguishes "Reinstatement" (e.g. use of peat along access tracks, batter slopes, borrow pits and other construction contexts), "Revegetation," and "Peatland Restoration" as different uses of excavated peat, which we welcome, as they are functionally very different activities. However, this distinction is not carried through into the main chapters (e.g. Chapter 6 Peatlands and Development, Chapter 8 Restoring Peatlands), where "use of peat" is discussed without consistently signposting which category applies. In our members' experience, this is creating genuine confusion in industry, with engineering-focused reinstatement (e.g. reinstating access tracks or batter slopes) sometimes being presented or perceived as equivalent to ecological restoration, when it is a materially different activity, i.e. closer to waste-management / engineering than to restoring peatland structure and function. We recommend the Standard bring the Glossary's Reinstatement / Revegetation / Restoration distinction into the main text, and state clearly that reinstatement-type reuse does not, by itself, constitute restoration for reporting or compliance purposes.
- Managing native tree / scrub encroachment: the Standard expresses a presumption toward removal of naturally-colonising native trees / scrub (Annex H, H-60, H-61, H-64 (pp.119–121)). [CIEEM good practice guidance](#) advocates for a more cautious approach, observing that scrub / woodland may be a natural erosion-inhibiting edge and highlighting a case study where colonisation is monitored rather than removed. We suggest that the importance of site-specific ecological judgement be emphasised here, given evidence that some scrub / woodland cover may support rather than harm peatland edge stability.
- The above consideration is distinct to the problem of self-seeding of non-native conifers such as Sitka Spruce and Lodgepole Pine against which we do support a presumption towards removal from peatland and application of the polluter pays principle where those responsible bear the cost of control and remediation. According to an investigative report from The Ferret, NatureScot predicts that 846,000 hectares of peatland are at risk of seeding from nearby tree plantations, and for 267,000 hectares (approximately more than twice the size of Fife)³.

³ <https://www.theferret.scot/invasive-sitka-spruce-threaten-scotland/>

- At 8-4, point 3, we suggest the Standard require that evidence used to distinguish man-made from natural degradation be recorded, along with the analysis and reasoning behind that judgement. Separating the two causes is inherently difficult and open to differing interpretations, so a documented justification would improve transparency and consistency of decision-making.
- At 8-4, point 8, we would also ask NatureScot to consider expressing a stronger preference for forest-to-bog restoration where afforested peatland is involved. The UK Forestry Standard's "Forests and Soils" guidance presents this as one option among several, but leaving peatland afforested does not restore its function and allows degradation to continue. We think the Standard should be clearer that restoration to bog is generally the preferred outcome, where feasible.

Usability

How useful is the background information on peat formation, its ecology and function? (Chapter 2)

1-not useful at all

2

3

4

5-very useful

Please use this space to explain why you gave this rating.

The background information is useful in principle, but Chapter 2 is unbalanced in its treatment of degradation drivers. A large proportion of the chapter is devoted to natural degradation and climate change, while anthropogenic degradation is covered only briefly. This balance inadvertently conveys the impression that degradation is mainly a natural process and that climate change is an unstoppable driver undermining restoration progress. We recommend Chapter 2 be rebalanced to give proportionate weight to anthropogenic drivers.

With regards degradation, fire (both historical, including events centuries old, and recent) is one of the most significant drivers of degradation; large, hot, long-duration burns initiate erosion processes (gully formation, peat pipes, peat collapse) that continue long afterwards, including edge-drying and cracking that progressively widens gullies. This interacts with herbivore pressure, particularly deer, which is a major issue in Scotland.

The risk of peatland fires will likely grow with climate change and the increasing severity of heatwaves and droughts, as evidenced by incidents in recent years, including the major 2026 fire in the heart of the Cairngorms National Park. Degraded peat which is already drier than it would be in near-natural conditions is especially at risk.

Air pollution (SO₂ and nitrogen deposition) may also be a relevant driver, though this is likely more significant in the Southern Uplands and areas closer to the Central Belt than elsewhere. We recommend Chapter 2 give explicit coverage to fire and herbivore interplay, and consider whether air pollution warrants mention depending on regional relevance.

[CIEEM good practice guidance on bogs](#) observes that CO₂ uptake is offset by methane emission on a near-natural bogs and explicitly warns against over-raising water tables to the point methane becomes dominant. We suggest that a caveat about the methane trade-off be incorporated into the Standard's carbon / tipping-point language, so restoration success indicators and communications don't overstate net carbon sequestration benefits of rewetting.

We would also welcome greater consideration of climate change adaptation; not just its role as a degradation driver, but what practical adaptations are needed in Scotland's peatland management and restoration practice as the climate changes. Annex G (G-49) touches on this but is limited to stating that impacts should be "considered," without setting out the directions or options currently being explored or trialled in Scotland. If there is existing thinking, trial results, or case studies on this, we would like to see them reflected here to give practitioners something more actionable to work with.

Will the Standard help you make operational decisions related to peatland protection, management and restoration? (Chapter 9)

Yes, but not fully. Some CIEEM members not directly involved in land management, e.g. are in planning / advisory roles, have said that they do not find it directly supports their day-to-day operational decisions.

Please use this space to tell us how this could be improved in the Standard?

Broadening the operational guidance to explicitly address non-landowner / manager users would improve this.

Chapter 9 and the Annex H, contain the detailed checklist, requirements and guidance for Organising your Operational activity. Should these remain split between Chapter 9 and the Annex H, or should all of this information be included in the main document, or all in the annex, or as stand-alone supplementary guidance?

Yes, remain split between Chapter 9 and Annex H as the balance is good.

No, move all of the information from Annex H into Chapter 9.

No, move all of the information from Chapter 9 into Annex H.

Move and contain all information as stand-alone supplementary guidance.

Other

Please use this space to tell us why you selected this option.

It would help with clarity if all the information is provided as stand-alone supplementary guidance. A useful comparison might be between the Land Reform (Scotland) 2003 act and the Scottish Outdoor Access Code. An advantage of adopting this approach is that clarifications and updates can be included without having to change the standard itself.

At present, Annexes C and G in particular contain a large amount of material that is essential to correctly interpreting the main text (see our comments on Annex C and the Principles above), but the connection between the annex and the relevant chapter is not always made clear enough, so a reader could easily miss it. This reinforces our preference for supplementary guidance being managed as a stand-alone, easily updatable resource. We also noted that Annex A (the glossary) includes a number of terms that don't appear to be used, or cross-referenced, elsewhere in the document; a review to ensure the glossary aligns with actual usage across the text and annexes would help.

Will the Standard help you assess outcomes of peatland activities (Chapter 10)?

Yes

Partially

No

Please use this space to tell us why you selected this option.

Monitoring, reporting and verification receive comparatively little emphasis in the Standard, despite being crucial to demonstrating outcomes; this is a key opportunity to set the standard for monitoring and evaluation and it is important that this is set out in detail in the final version.

At 10-6, it isn't clear how users should actually carry out the assessments being asked for; a link to relevant methods, or a reference to where these are set out, would help. Many of these assessments are onerous and costly, and users with less experience in this area need to understand what's involved and how to identify appropriately qualified people to do the work.

There is also currently very little reference to date on what management and restoration approaches are actually working in practice. We note that the effectiveness of approaches can vary substantially by region and peatland type. We recommend the Standard be supported by regional case studies that illustrate how outcomes and appropriate techniques

differ across Scotland, and that monitoring / verification requirements be given greater prominence and specificity. Photographs of good and poor outcomes would further help users calibrate their own judgement.

Completeness

How complete is the Standard?

1-incomplete

2

3

4

5-complete

Please use this space to tell us what gaps need to be addressed and if further material needs to be added to the Standard or provided in supplementary guidance?

A significant gap is the limited evidence base on livestock impacts; in particular, the effect of sheep grazing on peatland condition, which can vary considerably depending on stocking density, timing and local context. The Standard would benefit from a clearer, evidence-based treatment of grazing impacts across different peatland and management contexts. As noted above, monitoring / verification and regional case-study evidence are also gaps that should be addressed before finalisation.

We note that worked examples in Annex C are largely drawn from a range of non-forestry contexts, but Principle 13 (optimal recovery, Restoration pathway) relies heavily on forest-to-bog restoration examples specifically. We'd suggest broadening the examples given for this principle to include other restoration contexts (e.g. hydrological, agricultural) for balance.

Given that peatland protection, management and restoration is undertaken alongside other land use activities, please rate how likely is the Standard to lead to unintended consequences on this wider work?

1-have unintended consequences

2

3

4

5-supports / complements wider work

Please use this space to tell us what the unintended consequences might be?

A few specific risks stand out where peatland activity interacts with other land use. First, because the pathway structure does not clearly incentivise moving from protect-and-manage to restoration, landowners may default to the less onerous pathway even where restoration would be appropriate; this risks undermining wider Scottish Government restoration commitments rather than just individual site outcomes.

Second, the lack of clarity distinguishing engineering-type peat reinstatement (e.g. along access tracks or batter slopes) from genuine ecological restoration could allow reinstatement to be reported or perceived as restoration, distorting monitoring of how much real restoration is occurring, particularly in development and renewables contexts. This can be addressed within the Peat Management Plan which forms part of the planning application and follows the mitigation hierarchy. It ensures peat disturbance is avoided where possible, minimised where unavoidable, and reinstated or reused on site (not restoration). The Habitat Management Plan identifies the areas designated for true restoration, including application of the 1:10 multiplier, and is also secured through planning conditions. However, there remains some genuine confusion for developers with regards the role of the reuse of excess peat on-site to support the hydrological conditions

necessary for effective peatland restoration. This is an area that the standard should provide clarity on.

Third, inconsistent strength of wording across chapters (e.g. "have regard to" versus "must") could result in uneven enforcement between sectors — for example between agriculture, forestry and development — creating a perceived unequal playing field.

Finally, we note the Standard's limited treatment of deer and herbivore management alongside peatland restoration objectives could create friction with other land management priorities (e.g. sporting estates, forestry) where herbivore control approaches are contested.

We recommend NatureScot provide guidance on how such unintended consequences may be avoided or resolved, while we acknowledge that some cases may remain “wicked problems”, i.e. hard or impossible to solve because of complex, changing, and connected factors .

Balance

Overall, has Scotland’s Peatland Standard achieved a balance between providing technical information, and a helpful way of making technical decisions?

1-skewed

2

3

4

5-balanced

Please use this space to provide your comments on the balance of Scotland's Peatland Standard

The Standard is technically detailed, but this depth is not always matched by an equivalent focus on helping users make decisions with it. Three examples illustrate this imbalance.

First, Chapter 2's background information is weighted heavily toward natural degradation and climate change, with anthropogenic drivers covered only briefly, which skews the picture of what is actually causing degradation in Scotland. Second, the document's own framing sits closer to a collated technical reference — bringing together legal, policy and practitioner knowledge — than to a standard that sets a clear bar for decision-making; several members felt this blurs "informing" and "guiding" rather than balancing them. Third, monitoring, reporting and verification (Chapter 10) receive comparatively little attention relative to the technical detail given to requirements elsewhere, despite being essential to knowing whether the Standard's ambitions are being met in practice. We recommend NatureScot review the document with an eye to whether each chapter gives users enough practical direction to act on the technical information provided, not only the information itself.

Concluding question

Please use this space for any final comments that you wish to share on the draft Scotland's Peatland Standard.

CIEEM wishes to state clearly that we are supportive of there being a Peatland Standard for Scotland in principle, and welcome NatureScot's efforts to bring consistency to this area of practice; the Standard does an excellent job of consolidating Scotland's fragmented legal and policy framework for peatlands into a single reference point, with helpful links to further Scottish resources. Our comments above are intended constructively, to help strengthen the document ahead of finalisation.

The standard mentions the need for periodic reviewing, which is important. However, we suggest that a time-scale for reviewing should be given, e.g. every five years.

We'd welcome clarification as to whether and how peatland restoration monitoring is expected to relate to biodiversity metrics such as the Scottish Biodiversity Planning Metric (SBPM) or the Bog Quality Index; the Standard's Chapter 10 "Assessing Outcomes" does not refer to either.