

THE COMMITMENT TO RESPONSIBLE PEAT USE



Introduction and Background

The harvesting and combustion of peat is an essential component in the production of unique Scotch Whiskies. It is used only in the malting process to impart a distinctive 'peaty' aroma to the malted barley which in turn contributes to the character of the final product. Found in a wide variety of blended and single malts, peat is one of the most memorable aromas and flavours set out in the [Technical File for Scotch Whisky](#) which helps to foster the link between Scotch Whisky and Scotland.

Although peat is an important element in the production of some Scotch Whiskies, the peatlands from where it is harvested are also some of the most valuable ecosystems on Earth. Whilst only accounting for just 3% of the planet's land surface, they are our most effective terrestrial carbon store. A sizeable percentage of peatlands can be found in Scotland where they cover an estimated 20% of the country's landmass and store around 1600 million tonnes of carbon. In addition to locking in vast quantities of Carbon, healthy peatlands can support biodiversity through plant species such as sphagnum moss and contribute to the local water quality.

However, despite their importance, over 80% of Scotland's peatlands are degraded. In their degraded state, peatlands are a net-emitter of carbon, contributing to further climate change, and release sediment into watercourses creating a financial burden for water treatment plants. There is now international agreement amongst world leaders to develop strategies to respond to these threats presented by degraded peatlands. In recent years, NGOs and consumers have also begun to exert pressure on Government and businesses to change their approach to peat and step-up their restoration activity. This culminated in a commitment by the Scottish government to invest £250m to restore 250,000 hectares of degraded peatland by 2030. This multi-annual investment will deliver peatland restoration activities through a number of partners in public, private and third sectors, part of which is co-ordinated by [NatureScot](#) through [Peatland ACTION](#).

Scotch Whisky and Peat

Peat is critical to creating the unique character and flavour of numerous Scotch Whiskies enjoyed across the world and there is currently no viable alternative to its use. Fortunately, compared to the demands for peat in other industries such as horticulture, the amount of peat required to produce Scotch Whisky annually is small; less than 1% of all peat extracted in Scotland every year.⁵ A majority of the 7000 tonnes of peat extracted annually for use in Scotch Whisky production is sourced from independent suppliers by third-party maltsters who produce the peated malt that is sold to distillers. This has important consequences for the [Scotch Whisky Association \(SWA\)](#) as it means that many members are commonly 'end users' in the peat supply chain and a majority do not have direct control over the sites from which the peat used in their brands has been extracted.

Nevertheless, the SWA recognises that despite this small quantity and the limited ability of our membership to influence the peat extraction practises employed by third parties, responsibly using peat is a fundamental component of our environmental obligations and further action should be undertaken to address industry usage. Whilst many SWA members are already engaging with NGOs and government schemes to carry out peatland restoration projects and are seeing great success, the industry has yet to act collectively to protect, restore and sustain Scotland's peatlands. The Commitment to Responsible Peat Use (CRPU) is the first step on the path to achieving this goal.

¹ 'Peatland Benefits', IUCN Peatlands Programme [last accessed 15/10/22]. <https://www.iucn-uk-peatlandprogramme.org/about-peatlands/peatland-benefits>

² 'Why Restore Peatlands', Scotland's Soils [last accessed 18/10/22]. <https://soils.environment.gov.scot/resources/peatland-restoration/#:~:text=Peatlands%20are%20a%20key%20part,1600%20million%20tonnes%20of%20carbon.>

³ *Securing a green recovery on a path to net zero: climate change plan 2018–2032*, Scottish government [last accessed 17/10/22]. <https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/pages/12/>

⁴ *Peat Extraction Impact Assessment*. DEFRA [last accessed 03/02/23]. https://consult.defra.gov.uk/soils-and-peatlands/endingtheretailsaleofpeatinhorticulture/supporting_documents/Consultation%20Impact%20Assessment%20%20Ending%20the%20Retail%20Sale%20of%20Peat%20in%20Horticulture%20in%20England%20and%20Wales.pdf

⁵ *Mineral Extraction In Great Britain*. The Department for Communities & Local Government [last accessed 18/11/2022]. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/407761/Mineral_extraction_in_Great_Britain_2013.pdf

What is the Commitment to Responsible Peat Use?

The CRPU is a high level, peer-reviewed document outlining our ambition to achieve a sustainable future for the use of peat in the Scotch Whisky industry. It was developed by an expert group of Scotch Whisky producers following consultation with the [Scotch Whisky Research Institute \(SWRI\)](#), important supply chain partners such as the [Maltsters Association of Great Britain \(MAGB\)](#) and leading NGOs. In doing so, the SWA has identified three priority areas where action will be taken. All three of these must be addressed to realise our commitment to become responsible users of peat.

Priority 1: Responsible Extraction

The SWA will require the highest environmental standards of care to be applied to its members' extraction sites as is determined by best practise guidance and outlined in their site-specific restoration plans and implementation. We are committed to working with third parties across the peat supply chain to minimise our overall impact.

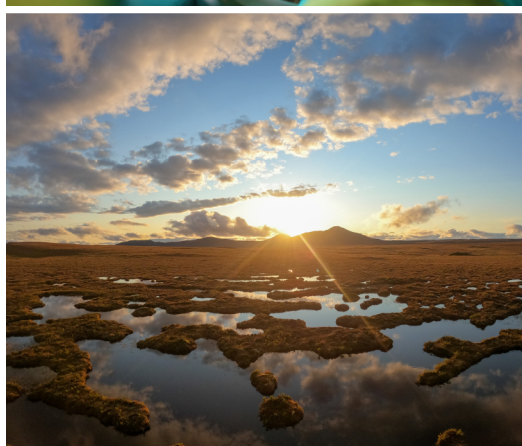
Priority 2: Optimising the Malting Process

The SWA will work closely with SWRI and MAGB to support ongoing research to maximise the efficiency of the malting process to reduce overall emissions and optimise peat use.

Priority 3: Peatland Restoration and Stewardship

The SWA will promote peatland restoration efforts across the Scotch Whisky Industry by strengthening the relationships between our member companies and the bodies spearheading restoration activity. As industry leaders, we will drive an increase in peatland restoration undertaken by our membership.

In order to ensure that we continue to reflect the current priorities in peatland protection, the SWA will review the CRPU; seeking input from NGOs, government bodies and our members where appropriate. This review will be conducted annually or following any significant change in policy, legislation, and the peat supply chain. An annual report of our work towards addressing the priorities of the commitment will also be produced to inform of our ongoing success and areas of concern. The responsibility for driving activity tied to the three priorities of the Commitment to Responsible Peat Use will be held by the SWA's Peat Supply Chain Working Group. This working group has been formed as part of the CRPU's launch and consists primarily of experienced representatives from member companies with a direct involvement in the production of peated Scotch Whisky.



Responsible Extraction

Following the publication of [National Planning Framework 4 \(NPF4\)](#) by the Scottish government, new protections have been introduced for Scotland's peatlands. Under Policy 5e in the framework, development proposals for new commercial extraction sites and extensions to existing extraction sites are subject to increased conditions before consent is granted by local authorities.

Although it remains to be seen how these new policies will be applied to existing peat extraction sites, the SWA welcomes the increased protections which are provided through NPF4. We are intent on doing all we can to support the ongoing regulation of peat extraction and to take the initiative to not only meet our legal obligations as peat consumers and harvesters as outlined in government policy but to exceed them. Whilst our ability to directly influence the process of peat extraction is restricted to the sites which are owned by our membership, there remains much that the SWA can do as leaders in the Scotch Whisky industry to contribute to the sustainability of peat extraction in the coming years.

Encouraging Best Practise

The SWA is committed to supporting our members with extraction sites to achieve good practise as required by the Scottish Government and influenced by leading authorities such as Peatland Action. This will be achieved via the online Peatland Forum which is being developed as part of the CRPU. This forum is open to all SWA members and will provide signposting to Scotch Whisky distillers directing them to information on best practise in peat extraction, guidance on extending permissions, and more. The SWA's industry team, with the support of the Peat Supply Chain Working Group, holds responsibility for ensuring the Forum remains up to date and easily accessible.

Following the publication of the CRPU, the SWA is also committed to implementing a comprehensive engagement programme with peat extraction sites managed by both our members and third-party suppliers on which the industry depends. Site visits are opportunity for site managers to share key learnings with other industry stakeholders and further best practise, as well as demonstrate progress towards implementation of their restoration plans which are required under extraction licences. Whilst the ultimate responsibility of ensuring compliance with NPF4 and other policy falls with local planning authorities, this engagement programme will help to reinforce the work carried out by these bodies and ensure compliance with planning conditions.

To ensure that high standards are maintained across the sector, we now require each of our member-managed extraction sites to host one site visit at least every two years. Doing so will ensure that no sites operate without consistent engagement with the association and the wider peat supply chain. By implementing these new obligations on our sites, SWA members can work to hold themselves to account and meet the standards of care rightly expected from peat extractors in 2023.

Minimising Impact

The methods of peat extraction used in sites that provide peat for the Scotch Whisky Industry are varied. Many use tractor-pulled 'sausage' or 'screw' extruders whilst other, often smaller-scale sites still employ traditional cutting methods. Larger full depth extraction sites may employ 'deep-dug' methods using heavy machinery to dig increased volumes of peat. The potential impact these different methods have on the surface flora and the peat are also varied; with certain methods of extraction causing considerably more disturbance than others. This highlights the importance of a site's restoration plan and their early enactment to ensure effective restoration and a timely reduction in Carbon emissions from the sites.

To be responsible users of peat, due consideration must be given to extraction practises. Following the development of the CRPU, members of the SWA are expected to conduct an assessment of their extraction methods alongside any scheduled review of their restoration plan. This assessment will be conducted following a similar process to their restoration plan; relying on internal, external and SWA expertise where appropriate. Optimal draining techniques, run-off control, vegetation placement and

other examples of best practise should be considered as part of this assessment and employed where possible. Whilst the SWA recognises that the volume of peat required from certain sites can render some less intrusive methods of extraction unviable, all effort must be made to maximise a site's restoration potential by minimising the effect of extraction methods.

Acting with Transparency

Under current extraction licensing laws, a prerequisite to gaining extraction permission is that sites engaged in peat extraction must have a restoration plan. However, due to local council resource constraints responsible for monitoring the enactment of restoration plans, there is a risk that some are not carried out or sufficiently detailed to effectively meet the operational and restoration requirements of the sites.

To help address this, SWA member companies that own an extraction site have now committed to informing us of their restoration plan implementation and making the contents of such plans easily accessible to interested parties. Furthermore, we now require members to actively share important updates with the Association on the progress of restoration work. These developments will be collected as case studies held on the Peatland Forum and articulated to external bodies and shared with other members. Working to build this timeline of industry progress will have multiple functions; from allowing us to be more transparent with the public to better holding our members to account.

Collaborating and Leading by Example

The Commitment to Responsible Peat Use has been produced by and for member companies of the SWA and does not apply to partners and distillers outwith the Association. However, as has been recognised, achieving responsible peat extraction is a multi-stakeholder issue which requires the collaboration of maltsters and third-party extractors as well as Scotch Whisky distillers. The SWA works hard to foster positive relationships with stakeholders in the supply chain, and we advocate strongly for our partners to adopt similar principles to those outlined in the CRPU. One means of achieving this increased collaboration will be through the newly formed Peat Supply Chain Working Group which will invite, in addition to SWA members, a range of third-party stakeholders to attend including maltsters, commercial peat extractors and research bodies such as SWRI.

We have also established that no framework for best practise currently exists for the extraction of peat specifically for use in the Scotch Whisky industry. To address this, the SWA is committed to developing an industry-specific framework which will be published in 2025. This framework will not act as a substitute for existing guidance. Instead, the Framework for Best Practise in Peat Extraction will supplement authoritative best practise guidance already offered by existing environmental bodies. The framework will serve to provide additional perspective specific to the Scotch Whisky industry and a required commitment for members and optional for third-party companies in the peat supply chain.

The SWA will seek the input of vital supply chain partners in the development of the framework to ensure that the final publication accurately accounts for the variety of extraction sites used by the Scotch Whisky industry. We will also confer with leading NGOs and seek third-party consultancy support where appropriate. The initial research and development phase of this framework will begin in 2023 under the supervision of the Peat Supply Chain Working Group and updates given in due course.

Our new schedule of extraction site visits hosted by our membership, as outlined above (Encouraging Best Practise) will play an important role in developing our understanding of the requirements of this framework. We believe that by 2025, regular site visits and other measures outlined in the Commitment to Responsible Peat Use will work to firmly embed and maintain pressure for the adoption of the Framework for Best Practise in Peat Extraction throughout the entire supply chain.

Peat Use in the Malting Process

Around 75% of emissions produced by our peat use comes from its combustion.⁶ Therefore, an important element of using peat responsibly is a determination to optimise the peat we harvest. Maximising the efficiency of the malting process helps us to minimise overall emissions produced from burning peat and further reduce the amount required by the industry. To achieve this, the SWA works closely with the Scotch Whisky Research Institute (SWRI) and the Maltsters Association of Great Britain (MAGB) through the SWRI's Peat Research Group, which aims to identify opportunities to increase efficiency and reduce emissions associated with peat use in malting operations.

Currently, the research priorities of the SWRI include:

- Increasing our understanding of congeners (the chemical components) responsible for peaty flavours to allow better monitoring of peat within the malting process.
- Improving efficiency in the kilning process by understanding the parameters required to optimise production of key peat smoke components and their adhesion to malt.
- Decreasing losses of peat congeners in the whisky making process.

In time this research will present opportunities to increase our efficiency and reduce extraction requirements. Key scientific developments raised in the Peat Research Group will be disseminated to our membership through the Peatland Forum. Looking ahead, the SWA will continue to facilitate dialogue between those driving the research on peat, our wider membership and maltsters to ensure that the use of peat in the malting process is sustainable and led by science.

Peatland Restoration and Stewardship

Many SWA members are already engaged in the active restoration of peatlands. Furthermore, there are a range of distilleries which are invested in adjacent land stewardship projects which contribute to supporting biodiversity and the local habitat. The SWA itself has now begun to increase its own monetary support towards the delivery of peatland restoration in alignment with these members.

However, as part of our Commitment to Responsible Peat Use, we are determined to do more to coordinate, communicate, and expand the breadth of this restoration work and stewardship carried out by our membership. Key to achieving this objective will be the development of the SWA's Peatland Forum through which members can communicate learnings and be well informed of successful peatland restoration. The SWA is also committed to a schedule of annual events held online and in-person which will bring members into contact with leading NGOs and government bodies to share good practise. These will include visits to restoration projects outwith those overseen by our members to increase interaction between distillers and external organisations.

Supplementary to this programme will be the development of a toolkit for peatland restoration. This will outline available support and funding and will be created with advice from consulting peatland experts which will be accessible via our Peatland Forum on our members-only Hub. The toolkit will be geared towards helping smaller distillers that have an interest in engaging in peatland restoration.

To be responsible users of peat, it is vital that the SWA continues and expands interaction with the leading NGOs and government bodies engaged in peatland restoration following the publication of the CRPU. Accordingly, the SWA is now committed to pursuing scheduled reviews with these and other organisations to discuss ongoing restoration projects and the potential for collaboration. Doing so will not only ensure that the Scotch Whisky industry is aligned with those most knowledgeable of Scotland's peatlands, but that the SWA can be ideally situated to offer effective guidance to its expanding membership on how they can best engage with others in peatland restoration in the years to come.

⁶ *The carbon costs of peat extraction in the Scotch Whisky industry'*, SAC Consulting [commissioned 2020].