

Scotland's Peatland Standard Draft - Have your say questionnaire

What we are asking: Scotland's Peatland Standard is being developed through stakeholder engagement. This consultation on the draft will help us consider the changes needed before publication at the end of 2026.

Privacy and data handling: Your response will be handled in accordance with the **NatureScot - Scotland's Peatland Standard - Privacy Notice** which details how your responses and information will be processed. Please do not put any personal information into the text boxes.

The questions are arranged under the following headings:

- About you
- Navigation
- Ambition
- Adding value
- Usability
- Completeness
- Context
- Balance

How to respond: The draft Standard is available to read at: [Nature.scot/scotlandspeatlandstandard](https://nature.scot/scotlandspeatlandstandard). There are thirty-seven questions consisting of four questions about yourself and thirty-three questions on the draft Standard made up of a combination of rating statements and free text. We hope that this will make feedback as easy as possible on this technical and complex document. Apart from the first three questions which are mandatory, you do not need to answer every question after that. Please respond to the questions most relevant to your experience and role. The consultation opens on **21st May 2026** and closes at noon on **28th August 2026**. **Responses received after the closing date may not be considered before the publication.**

****Please be aware that this MS Form does not allow you to save your unsubmitted answers to return to at a later date or time. We apologise for any inconvenience this may cause.****

What happens next: A summary of consultation responses will be published following the close of the consultation period, setting out the key themes raised and how they have informed any revisions to the Standard prior to publication. We aim to publish the first version of Scotland's Peatland Standard by the end of 2026.

Contact: If you have any questions about this consultation, or require assistance, please contact: ScotlandsPeatlandStandardConsultation@nature.scot

Thank you for taking part in this survey which will help to develop Scotland's Peatland Standard.

About you

1. Which of the following best describes you *

- ☐ Landowner
- ☐ Land manager or agent
- ☐ Contractor

- ☐ Environmental adviser or consultant
- ☐ Funder or Investor
- ☐ Regulator - agency or local authority
- ☐ Researcher or academic
- ☐ Individual stakeholder
- ☒ NGO

2. What is your area of business? *

- ☐ Farming or crofting
- ☐ Forestry or woodland management
- ☐ Sporting management
- ☐ Development
- ☒ Conservation
- ☐ Other

3. Which country do you live or work in?

*

- ☒ Scotland
- ☐ England, Wales or Northern Ireland
- ☐ Rest of the world

4. Opt-in

If you would be willing for us to contact you to discuss or clarify your responses and to notify you when the summary report is available on webpage, please provide your email in the box below.

general@fms.scot

Navigation

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

	Very Clear	Acceptable	Neutral	Needs work	Not Clear
The scope and purpose is	☐	☒	☐	☐	☐

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

By way of introduction, Fisheries Management Scotland is a membership organisation, representing the interest of District Salmon Fishery Boards and Rivers and Fisheries Trusts throughout Scotland. Peatlands are an integral freshwater resource within river catchments throughout Scotland. Strategic and well-implemented protection, management and restoration of these ecosystems can contribute to significant benefits at a larger catchment scale, supporting natural flow regimes and water quality in downstream waters, and contributing to greater biodiversity, including macroinvertebrate and fish species that inhabit inland waters.

We see it as imperative that peatland protection, management and restoration activities be delivered within the wider catchment context to ensure peatland-related actions also make sense for adjacent and downstream riverine environments. We welcome decision-making frameworks that allow for evidence-based and pragmatic decision-making within this local context.

There is always a challenge in finding the right balance between prescriptive advice and flexibility for pragmatic decision-making. The standard provides a detailed compendium of information and technical references to support peatland restoration in Scotland, and this information is presented in a well-organised structure. However, at times, the document feels more like a technical reference list than a clear standard that can be followed to support consistent decision-making. For example, while the document lays out legal requirements, essential good practice requirements and additional supporting practice, the document doesn't always provide clear guidance on when these measures would be relevant or not, which specific contexts these measures are expected to be followed e.g., for abiding by the Muirburn Code, or the practical or procedural risks and consequences if they are not followed. This document would benefit from more clarity on when/how users should expect to apply the standard in decision-making, e.g., outlining where specific expectations need to be met versus where there may be more flexibility to achieve a defined level of good practice.

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

	Very Accessible	Acceptable	Neutral	Needs work	Not accessible
The overall structure and presentation of Scotland's Peatland Standard is...	☐	☐	☐	☒	☐

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

The structure of the document (e.g., protect, manage and restore pathways) provides a useful framing for actions, however, this structure can be difficult to navigate, particularly where practitioners may be implementing projects that

deliver across multiple pathways on the same site. It may be useful to consider how to re-structure the information in chapters 6-8 to highlight key information that would be relevant and applicable across all pathways and reduce repetition. For example, the essential good practice requirements for restoring peatlands (Section 8-4) are broadly applicable and relevant to inform decision-making across all pathways. Highlighting these upfront would also support decision-making around which pathways are most appropriate.

As noted above, the document serves as a comprehensive resource for peatlands in Scotland. Expertise across multiple disciplines and an understanding of the local context will be required to navigate and apply the standard in its entirety. This expertise will often extend beyond that held by project decision-makers. It would be useful to include a description of the types and level of expertise that are needed to deliver different aspects of the standard to ensure that decision-makers seek out advice from those with relevant expertise.

Ambition

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

- ☐ Yes
- ☒ Partially
- ☐ No

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

The objectives within the standard support improving and restoring hydrologic processes, which serve as a key foundation for biodiversity and ecosystem functioning, both within peatlands and at broader catchment scales. This is a priority for many of our members, as well-designed and strategic efforts to protect, manage and restore peatlands not only deliver outcomes for peatland habitats, but also broader environmental outcomes, including for downstream freshwater invertebrates and fish.

The Standard would benefit from greater discussion of peatlands within the wider landscape context, not only to address the full suite of potential pressures affecting baseline condition, but to ensure actions delivered across all three pathways align with broader catchment objectives and concurrent efforts to protect, manage and restore other habitats and freshwater environments (e.g., riparian planting and herbivore management). Strategic planning efforts are currently being undertaken throughout many catchments within Scotland, and it may be useful for practitioners to tap into these efforts when planning peatland protection, management and restoration actions.

Considering peatland habitats alone without considering the wider landscape context risks creating simply another managed habitat, as opposed to the full potential for protecting and improving functioning ecosystems at a river catchment scale. It is vital that the decision-making process address, where appropriate, the causes of unfavourable condition. This requires strategic protection and management of peatlands under pressure at a catchment scale alongside restoring damaged peatlands.

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

- ☐ Yes

☒ Partially

☐ No

12. 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?

As noted above, it provides a valuable compendium for a range of technical and policy guidance related to peatland activities. However, we believe the document would benefit from revised and additional guidance around shallow peat, riparian woodland and other transitional habitat areas (e.g., incorporating IUCN guidance into sections 6-12 to 6-14 and 7-25 to 7-27). See IUCN UK Peatland Programme and National Trust (2026) Native Trees in Peatland Landscapes. Available at iucn-uk-peatlandprogramme.org.

Several of our members have extensive experience in riparian woodland planting and have expressed concerns with the buffer guidelines around deep peat. Within larger woodland projects, deep peat is preserved as open areas but often without a 50m buffer, as this would significantly reduce areas where trees can be planted, especially in high altitude areas and along riparian corridors. We recognize that strict planting restrictions provide a precautionary approach and may be appropriate in certain contexts, however, it doesn't allow for flexibility in application where native tree planting could be appropriate in the local context, e.g., allowing for native woody vegetation to establish along river corridors adjacent to peatlands. Adhering to fixed buffer widths is not always practical or appropriate and more flexibility is needed to allow for restored riparian woodland corridors alongside functioning and restored peatlands, as well as to support other important and unique ecotones found in edge or transition habitats, shallow peat systems and naturally wooded peatland communities (as described in the IUCN Guidance referenced above).

Providing for greater flexibility in these parts of the standard would align with the advice provided elsewhere in the document around natural environmental succession following on from improved or restored hydrologic processes. In many instances, where deer numbers are high, reliance on natural regeneration or succession is not always sufficient and planting can be used to accelerate natural succession processes. Note that alongside this flexibility, adaptive management represents an essential good practice to ensure that outcomes are delivered as expected and tree planting doesn't result in unintended change to peatlands.

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

☐ Yes

☐ Partially

☐ No

14. 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?

Enter your answer

Adding Value

15. 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

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

In our view, the document often appears weighted towards direct peat restoration as an activity pathway, rather than first considering the reason the peat is degraded and then tackling the cause through the most appropriate set of actions, whether that be protection, management, restoration or a combination thereof. Some causes of degradation and restriction of vegetation recovery (i.e. deer pressure) cannot be tackled as a single action but require actions along multiple pathways with collaboration at landscape scale. There is a need for sustainable land management to help maintain restored peatlands in the long term, reducing browsing pressure being the main urgent intervention. As noted in our comment in 'Accessibility' above, it would be useful to provide additional guidance for early decision-making to support strategic intervention which may require a combination of protection and management alongside restoration actions.

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

	1	2	3	4	5
Rate (1 = incomplete; 5 = complete)	☐	☐	☐	☐	☐

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

Enter your answer

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

	1	2	3	4	5
Rate (1 = incomplete; 5 = complete)	☐	☐	☐	☐	☐

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

Enter your answer

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

	1	2	3	4	5
Rate (1 = incomplete; 5 = complete)	☐	☐	☐	☐	☐

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

Enter your answer

Usability

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

	1	2	3	4	5
Rate (1 = not useful at all; 5 = very useful)	☐	☐	☐	☐	☐

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

Enter your answer

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

	1	2	3	4	5
Rate (1 = not helpful at all; 5 = very helpful)	☐	☐	☐	☐	☐

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

Enter your answer

27. 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

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

Enter your answer

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

- ☐ Yes
- ☒ Partially
- ☐ No

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

Please see our response to Question 32.

Completeness

31. How complete is the Standard?

	1	2	3	4	5
Rate (1 = incomplete; 5 = complete)	☐	☐	☐	☒	☐

32. 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?

Well-functioning peatlands provide numerous benefits at larger ecosystem scales, restoring natural flow regimes and improved water quality conditions, including temperature. It would be useful to include information in the technical standard for setting and then monitoring outcomes related to broader biodiversity and catchment objectives, particularly related to downstream river ecosystems. Monitoring these wider effects of peatlands could provide further opportunities for research and improve efficacy of interventions. District Salmon Fishery Boards and Rivers and Fisheries Trusts have substantial local expertise, and thus have the potential to play an important role in delivering such monitoring

More generally, monitoring and reporting are important for demonstrating that project objectives and outcomes have been delivered effectively and to provide information on where adaptive management may be needed to achieve objectives. However, funding for post-project monitoring is often limited, requiring difficult decisions around what level of monitoring can be completed and by whom. As such, greater consideration is needed early in project planning on how post-project monitoring will be funded and delivered. In addition, it would be useful for the Standard to discuss how monitoring data could be used to inform adaptive management measures, and how results could contribute to greater understanding of the effectiveness of interventions across different peatland types and regions within Scotland.

Context

33. 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	2	3	4	5
Rate (1 = have unintended consequences; 5 = supports/compliments wider work)	☐	☒	☐	☐	☐

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

Funding of some of the best practice requirements, including detailed surveys and assessments, can be a major constraint for many restoration and conservation organisations, including our members, and for land managers. For example, in Section 6-14, the Standard recommends a site-specific hydrological assessment for woodland creation, however this level of assessment is often difficult to fund as part of a native riparian woodland proposal with no commercial interest. Similarly, the level of baseline data required can often vary depending on the nature of the project, with some projects such as muirburn licensing able to rely on published maps of deep peat, while for other

applications baseline site-specific surveys of deep peat are required. In Section 10-6, the Standard notes that outcomes assessment should be proportionate to the size, scale and nature of the activity – it would be useful to set a similar, consistent expectations for baseline assessment as well.

Balance

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

1

2

3

4

5

Rate (1 = skewed; 5 = balanced)

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

We recognise there is always a challenge in finding the right balance between prescriptive advice and flexibility for pragmatic decision-making. The document would benefit from some additional guidance to support decision-making, particularly where certain technical elements or requirements may not always be relevant within the local context or where more flexibility is required to deliver objectives. Greater flexibility in decision-making can still represent a clear bar for essential good practice, where project decision-makers seek the appropriate level of relevant expertise to develop and implement actions, followed by monitoring and adaptive management. As noted above, it would be useful to include a description of the types and level of expertise that are needed to interpret and deliver different aspects of the standard to ensure that decision-makers seek out advice from those with relevant expertise.

Concluding Question

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

The usability of such a resource will require regular updates to ensure that the most recent regulations and policy guidance is included, as well as to ensure that technical standards and advice evolve with best available science and effective practice. It would be beneficial to include more detail in Section 1-9 outlining a process for updates and revisions, including the opportunity for users, policy makers and practitioners to submit feedback as new information arises.

