

PEATLAND CODE TECHNICAL ADVISORY BOARD – EXTERNAL MINUTES

Date: Tuesday 18th November 2025

Time: 11am-1pm

Venue: Online Meeting – Teams Meeting Invite

Attendees: Renée Kerkvliet-Hermans (chair), Garance Wood- Moulin, Emma Hinchcliffe, Ian Dickie, Rebekka Artz, Hans Joosten, Andy Grundy, Colin Douglas, Tamarind Falk, Iain Diack, Richard Lindsay, Harriet Santon, Ben Dipper, Peter Jones, Donald Nayar, Renny McKeown.

Apologies: Judith Stuart, Eimear Reeve, Christopher Evans, Katherine Birdsall, Iain Diack, Steve Clarke, Ian McKee, Stephen Clarkson, Andrew Moxey, Pat Snowdon, Rebecca Fairman, Alex Hart, Sophie Chapman, Patrick Jean-Martel, Judith Stuart, Vicky West, Rhoswen Leonard, Gillian Manniex, Sarah Erbanova, John Couwenberg James Dalton.

Agenda

1. Minutes and actions from last TAB
2. General updates
3. Exclusion zone around water courses
4. Missed areas at restoration validation continued discussion
5. Shallow peat areas in highly anthropogenic influenced peatlands (like Islay)
6. SBTi consultation
7. AOB

1. Minutes and actions from last TAB

Fire emissions

- Burning risk under IPCC methodology exists, but emissions from burning and post-burn peatlands remain unquantified.
- TAB members are modelling fire impacts and working on validation; progress is ongoing.
- Validation is limited because estates that practice managed burning often refuse emissions monitoring.
- Need to define fire-related emissions and what goes into the risk buffer.
- In England, managed burning is now largely irrelevant due to its ban on peatlands deeper than 30 cm.

ACTION: TAB member to follow up with the CF team about the fire emissions inventory.

ACTION: to follow up with TAB member re contact with Chartered Institute of Ecology and Environmental Management for the biodiversity code of practice.

2. General update

Project Registrations & Validations

- 389 projects registered (plus 2 pending registration)

- 106 project plan validated (8 pending)
- 35 restoration validated (10 pending)
- 1 Verifications due ASAP
- 56 projects registered so far for 2025 (1 pending)

Validations

- Working quite closely with VVB's to clear some of the backlog.
- The problems with registry have interrupted the progress we were making with regards to validations.
- Registry tender still not announced and new platform is up and running but currently working on clearing issues with the new set up.

Biodiversity FIRNS 3

- Project duration is 6 months, funded until March 2026.
- Key Aims:
 - Build a database of biodiversity communities in natural peatlands/woodlands (target: pre-New Year).
 - Develop a similarity index to compare communities pre- and post-restoration.
 - Assess biodiversity monitoring costs and integrate into financial modelling for credit valuation.
 - Create a roadmap for incorporating biodiversity into Peatland Code (PC) crediting.
- Multiple biodiversity metrics exist; IUCN aims to align with DEFRA outcomes while engaging with other metric developers.
- Linking carbon and biodiversity credits is complex; PC team confirmed they will remain separate.
- Risk of false claims about "pristine" sites—solution: compile and externally verify a list.
- Careful use of terms like stacking, bundling, and additionality to ensure compliance with standards.

Q: How do we link emissions to biodiversity? Are there variables that drive both in the same way? Certain metrics are only applicable in certain locations and cannot be applied elsewhere.

ACTION: TAB member to talk with NatureScot colleagues on their work done on nature and hydrological datasets.

ICROA

Due to have a meeting with the ICROA team next week following an update from their board.

UKAS

After a long delays and not getting any feedback PC Development Lead was able to meet with UKAS who have raised some findings that need to be address for version 2 and 2.1 before the VVB's can progress with getting accredited. Very frustrating as it's a taken a long time to get meetings and response from UKAS.

3. Exclusion zone around water courses

Background- Version 2.0 of the Peatland Code introduced exclusion zones. Projects with a watercourse are considered to have a drainage effect. If drains cannot be blocked, an exclusion zone must be applied, within which credits cannot be claimed. Version 2.1 clarified the definition and applicability of exclusion zones.

This approach has generally worked, but one project applied exclusion zones only to bare peat areas, arguing that only these areas create a drainage effect around watercourses.

Q: Do we say all watercourses need buffers or do we say only areas with bare peat have effect and need buffer area?

- Any feature cutting through peat affects drainage. Natural watercourses tend to resist water movement due to vegetation and shape.
- Natural features should generally be excluded; anthropogenic features (including gullies) included.
- Cannot usually be blocked; blocking can cause damage. Peatland Action (PA) avoids blocking natural features.
 - Natural watercourses often shown on 1:50k OS maps cannot be blocked or worked on without a SEPA license in Scotland.
- NatureScot allows work within 5 m of watercourses. Previous discussions concluded 30 m as a compromise due to varying figures.
- Challenges: Hard to distinguish natural vs man-made; case-by-case assessment impractical. Gradient likely influences impact.

Q: Can we have incising and not incising, excluding some areas with buffers and not others on the same water course or do we be consistent per course?

ACTION: TAB member to discuss this with the delivery team at NatureScot.

4. Missed areas at restoration validation continued discussion

Background- At restoration validation, assessors sometimes identify missed areas. If a project chooses to leave these areas, they can be excluded and documentation amended. If inclusion is desired, a forward-facing action is required: restoration can proceed, and the validation statement issued with a commitment to fix. This is acceptable for small areas, but a threshold is needed for larger missed areas.

- Following previous TAB and EB discussions, we have considered adopting a 5% materiality threshold based on carbon units, rather than the previously agreed fixed number of units or project area.
 - If we can justify it and back it with evidence, then it is defensible.

TAB AGREES so PC team will progress this and ensure it aligns with the accountability.

5. Shallow peat areas in highly anthropogenic influenced peatlands (like Islay)

Since version 2 we've lowered the peat threshold to 30cm, our main concern is around the areas being organo-mineral soils rather than peat

- We allow small pockets of shallow peat within deeper peat area, as expressed by the requested increased sampling (50m x 50m).

Q: Some projects have shallower peatlands caused by anthropogenic activities how can we look to include these or can they not be brought in as they cannot be matched with the emissions factors?

- Some studies suggested organo-mineral soils emit more than peat; treating them as peat gives a conservative estimate. They may hold more carbon per volume than peatlands.

Q: If it was previously cut, how can they evidence that it is eligible to be included in PC?

- Banks might help, but full-area cuts pose challenges.
- Natural processes and age matter more than depth for emissions.

- Shallower peat (e.g. 30 cm in Scotland) is risky to include, but excluding agri-peats/cut-over peats at that depth could be problematic due to high emissions.
- It is a priority to find solutions to include these high-emitting areas.

ACTION: All TAB members need to think more about how shallower cut peatlands can be included in the PC.

Paper suggestion:

Loisel J. *et al.* (2014) A database and synthesis of northern peatland soil properties and Holocene carbon and nitrogen accumulation, *The Holocene* 1-15.

6. SBTi consultation

The PC has issues with IPCC definitions of removals and their recent release of version 2 of their guidance.

- PC credits represent emission reductions, while SBTi only recognizes removals. This mismatch discourages companies from engaging with PC.
- New SBTi version mentions reductions only in the glossary; peatland restoration is not clearly included, despite references to enhancing natural carbon sinks.
- Credits typically classified as removals or avoidance; PC does not fit IPCC's removal definition.
- PC preparing a response before the 8th December feedback deadline, aiming to argue equivalence with tree planting. However, SBTi currently refuses to define PC as a removal.

ACTION: PC Team will be looking at the consultation for STBi v2 and their guidance. PC welcomes any TAB members wanting to sign it.

7. AOB

Verification

- Current verification methodology has been applied in at least two projects, but some aspects are considered unworkable by others.
- External input sought to revise the methodology via a working group.
- Goal is to produce workable amendments before New Year for presentation to TAB and EB next year.

Combining of project plan and restoration validation

- UKAS found issues must be resolved before VVBs can progress with accreditation—top priority.
- **Suggested** combining project plan validation and restoration validation to streamline processes and reduce errors.
- PC team are meeting with assessors to discuss concerns.
- Streamlined process increases risk as works will be completed before full checks; previously this was paused due to PD and VVB business concerns.
- Could reduce backlogs despite higher project risk.
- Optional checks could be at project plan stage (non-accreditable).
- Any change would not take effect until next financial year.

Date of next Meeting:

Tuesday 17th February 2026 11am-1pm