PEATLAND CODE TECHNICAL ADVISORY BOARD – MINUTES

Date: Tuesday 19th May 2026

Time: 11am-1pm

Venue: Online Meeting – Teams Meeting Invite

Attendees: **Renée Kerkvliet-Hermans (chair), Ian Dickie, Rebekka Artz, Hans Joosten, Andy Grundy, Colin Douglas, Tamarind Falk, Iain Diack, Richard Lindsay, Christopher Evans, Ian McKee, Pat Snowdon, Patrick Jean-Martel, Sarah Erbanova, Nadia Murphy, Iain Detrey, Alex Hart, Eimear Reeve, Ian Detrey, Donald Nayer, Steve Clarkson, Rebecca Fairman, Renny McKeown, Steve Clarke, Peter Jones,**

Apologies: **Harriet Santon, Emma Hinchliffe, Sophie Chapman, Ben Dipper, Andrew Moxey, Vicky West, Sarah Erbanova, Gillian Manniex, Ian McKee, Rhoswen Leonard, Judith Stewart, James Dalton, Rochelle Kennedy, Rebecca Artz**

Agenda

1. Minutes and actions from last TAB.
2. General updates.
3. Review current PC methodology.
4. Financial additionality and income foregone.
5. 2-year validity of baseline condition category survey is causing issues with multi-year projects and extensions.
6. Default width for AE for artificial drains that have widened and are now eroding.
7. AOB.

1. Minutes and actions from last TAB

Ongoing Actions from February2026 meeting:

ACTION: PC team is aiming to put together an application for the next round of FIRNS funding, would the rest of TAB feed into suggestions for additional work?

ACTION: one to ones with TAB to be arranged with RK to discuss in more detail next steps for biodiversity quantification work.

ACTION: PC team request some input from TAB on market risks.

ACTION: ID: there is a process by which he can contact on the ISO standards, if PC Team and TAB have a specific concerns with them, he could go through the process to raise them.

ACTION: RA: Ask Hannah about the current inventory method in terms of calculating emissions related to areas of bare peat.

ACTION: PC team requests feedback from the TAB on all other questions that there wasn't time for.

ACTION: ALL TAB MEMBERS please respond by emails to this question.

A lot of projects have missed their deadlines, meaning that their baselines for peat depths and emissions categories are out of date.

Q: do they have to re-baseline the whole site or alternatively what proportion would you request for re baselining and what would be the threshold for success/failure be?

2. General update

Project Registrations & Validations (as of 20/05/2026)

- 409 projects registered
- 132 project plan validated
- 51 restoration validated
- 9 Verifications part of pilot
- 126, 809 PIUs sold so far in 2025/2026
- 12 projects registered so far for 2026

Accreditation

UKAS:
Progress has been made as we have received a response and things are moving forward. We are hopeful that our findings will be signed off, and we are aiming to hold a meeting with UKAS later this week.

ICVCM:
Working on submitting our application as the window is still open. Uncertainty about when the application closes so Garance, on our team, has been prioritising this and has been working hard to submit it as soon as possible.

CivTech:

Rethink Carbon:
Rethink Code are building a platform that use AI systems to perform document administration before projects go on the registry. The main benefit will be to help capacity as it will eliminate a timely step in the process.

Sylvera:
Focus on woodlands, measuring biomass via helicopters but also testing equipment to measure peat depths, which could hopefully help further scientific understanding.

Cwiri:
Cwiri is a spin off from UKCEH and are interested in low-cost sensors to measure the water table of peatland sites. One of our TAB members plans on doing an expression of interest soon with an interest in feeding into the peatland code process.

Carbon Price Index:
Collaborating with the Woodland Carbon Code on a carbon price index for 2025 and this is currently underway.

3. Review Current PC Methodology

Q: Should we investigate alternative option for quantifying the emission reductions for Peatland Code projects?

Q: If yes, should this be done through a new working group?

- As you are all aware we have just launched the pilot for the new verification methodology. This methodology was created by a working group consisting of 2 VVBs, 4 PC project developers, 2 members of public organisations, 2 scientists and the Peatland Code team. It is the working group's opinion that a bigger overhaul of the verification methodology, as well as the current condition categories is needed.
- The Peatland Code is always balancing rigour with workability and costs. Rigour is needed to maintain market trust and not oversell any carbon credits but making the process too onerous and no landowner will want to use the Peatland Code anymore.
- Currently, the Peatland Code uses condition categories based on features in the field with standard drainage buffers around them for bogs and water table measurements for fens. The main criticism is the validity of the drainage buffers around haggs and gullies and if the full buffers will indeed be rewetted by reprofiling these linear features and/or blocking these gullies. Moving away from simple condition categories and standard buffers towards more field measurements like water table or using Richard Lindsay's condition matrix (Resources | IUCN UK Peatland Programme under "Technical guidance") could increase the rigour of the Peatland Code. However, this will inevitably also increase the monitoring costs for projects.

PC Member: Current condition categories are relatively simple and practical but may not represent the best available methodology.
- Acknowledged the known limitations such as broad assumptions
- Emphasised that these are simplifications designed for usability at scale

TAB: General recognition that the system in place works operationally but could be scientifically outdated
- Acknowledgement that simplifications do not need to reflect on the ground variability

PC Member: Noted that when V2.0 was introduced, water table monitoring in lowland sites was included, but not in upland sites.
- This decision was made at the time, but a working group has now strongly recommended reconsidering the decision.

TAB: Supports revisiting whether upland inclusion should now be considered.

PC Member: Referenced previous discussions on the potential use of Richard Lindsay's condition matrix as an alternative framework.

- Noted that at the time it was considered but ultimately was not mature enough for implementation.
- Highlighted that updated guidance and tools are now available.

TAB Member: Explained how the condition matrix can be translated into mapping units.

- Additional mapping layers are required to completely align with the needs of the Peatland Code.
- Provided examples of classification outputs using ground truthing.
- Suggests testing the matrix against existing sites to compare outputs with current methodologies.

TAB Member: Highlighted that the future defensibility would require strong evidence (water table data?)

- The current system may not be sufficient for the long-term
- Combining the approach of condition with hydrological monitoring may make it more robust.
- Integration could improve the accuracy without potentially increasing costs significantly.

TAB Member:

- Agree that a combined approach could provide better alignment overtime.

ACTION: IUCN to take this the Executive Board and establish a new working group.

TAB AGREES to investigate alternative options.

4. Financial additionality and income foregone

Q: Should we look at including income foregone in our financial additionality test?

- Currently, our financial additionality test does not include income foregone (see green box below). With the new ELMS scheme and more options for payment for rewetting in both uplands and lowlands under Countryside Stewardship (which cannot be combined with the PC under the CS rules) the need to include income foregone is coming up more often. In these instances, landowners are not just looking at covering their restoration costs but also want to receive an income. I have seen examples where a project is deemed non-additional under our current rules but could be additional if income foregone would have been included.

TAB: Highlights the inconsistency between treatment of income foregone in DEFRA schemes vs Peatland Code tests. Emphasis on the uncertainty due to rapidly changing output costs and subsidy rates.

Tab Member: Claims must be evidence-based:

- Landowners would need to demonstrate loss, not a hypothetical alternative
- If payments are optional or conditional, they may not constitute guaranteed foregone income
- Suggests that some agri-environment payments are not automatic and that landowners may be assuming income they are not guaranteed to receive.

TAB Member: Notes that current upland payment structures may already exceed income loss.
- Suggested risk that adding income foregone on top of grants could lead to potential overcompensation

TAB Member: Agri-environment payment rates are not static and may change overtime increasing uncertainties
- Suggests a modest profit margin may be necessary to incentivise long-term changes

TAB Member: Suggestion to compare with woodland schemes where partial grant uptake allows for stacking with carbon income although there is difference in the flexibility between the schemes.

TAB Member: Warned against adding unnecessary complexity to the Peatland Code
- Emphasis on weighing out the pros and cons before modifying financial additionality rules.

PC Member: Acknowledged complexity and lack of definitive immediate resolution
- Agrees to have a follow-up discussion with a smaller group identified during the meeting.

ACTION: PC Member to email interested TAB members to review and discuss including income forgone into the additionality test. The findings from the working group will be returned for further discussions at the next TAB meeting.

TAB AGREES for some members to participate in a working group.

5. 2-year validity of baseline condition category survey is causing issues with multi-year projects and extensions.

Q: Does the TAB agree with extending the restoration window from 24 months to 36 months?

Q: If so, would that require collecting extra evidence i.e. drone imagery at Year 1 and submitted as part of the Restoration Validation process?

- Version 2 of the Peatland Code (March 2023) allows restoration activities to be carried out over a two-year period. This timeframe was originally agreed to ensure that the requirement to have restoration validation within one year of the start date would still allow validators to meaningfully assess the restoration works that had taken place. However, for projects that are multi-year this timeline can be difficult to achieve as contracts for projects are typically awarded for 3 years. As a result, some projects are being forced to split into separate Peatland Code projects solely to meet the current two-year restoration window. This approach increases administrative burden, adds cost, and can fragment what is a single coherent restoration project.

PC Member: increasing numbers of multi-year and phased project delivery is making the current structure increasingly difficult to apply in practice.
- Suggested that extending baseline validity beyond two years could reduce unnecessary repeat surveys and reflecting project delivery realities.
- Noted that where sites do change, they are more likely to deteriorate rather than improve, reducing the likelihood of systematic over-crediting from slightly older baseline data.

Validator: Raised that longer validity periods could be a workable solution provided that the purpose of assessment remains clearly defined, ex. Assessing delivery against the approved project plans rather than the effectiveness.

- Some queries regarding the separation between restoration validation and year-one verification and a year-5 verification.
- Concerns raised about longer time gaps could make it more difficult to identify whether the works have been delivered as specified in the project plans, particularly where site conditions change or natural processes obscure the evidence.

ACTION: IUCN to read Joe Holdens paper (Earth Surface Processes and Landforms Earth Surf. Process. Landforms (in press) Published online in Wiley InterScience (www.interscience.wiley.com) DOI: 10.1002/esp.1476 Erosion and natural revegetation associated with surface land drains in upland peatlands Joseph Holden,* Michelle Gascoign and Nick R. Bosanko)

ACTION: IUCN to create some guidance that outlines regarding establishing what's been put in place vs what has developed naturally.

ACTION: IUCN to ask for advice extending the restoration window from 24 months to 36 months to Executive Board

ACTION: IUCN to take extending the validity of the baseline survey to 5 years to the Executive Board.

TAB AGREES that 5 years would be acceptable in line with the peat depth validity.

6. Default width for AE for artificial drains that have widened and are now eroding

Q: What would an appropriate default width be for artificial drains which have opened up to the point that they are bare and actively eroding?

- The latest clarification document (November 2025) now includes default widths for both vertical bare cliffs for haggs, gullies and peat banks from peat cutting: "Trace the crest of any visible hagg/gully or peat bank. Map the visible bare peat, measure the length and width and calculate the area. Only if the extent of bare peat cannot be determined from aerials, e.g., if bare peat is restricted to the steep bare cliffs, use a default width of two metres for haggs and gullies and a default width of 50cm for peat banks from peat cutting to represent the height on a map. If deviating from these default heights this shall be evidenced to the validation and verification body, see Field Survey section 3 below. Bare peat classifiers or other remote sensing technologies may be used for this, with a minimal mapping resolution of 25 cm.". However, we currently do not have a default width for artificial drains which have opened up to the point that they are bare and actively eroding, and require reprofiling, which also fall under the condition category "Actively Eroding: Hagg/Gully".

TAB Member: Initial thought was that 50cm seems reasonable but then that would be on the assumption that you have 50cm of peat.

TAB Member: Important to be clear about what definitions are being used (ex. Actively eroding drain vs standard drainage features)

Validator: Important that we have baseline evidence. Part of the issue is that it cannot be seen using drone imagery so perhaps using a lower amount (30cm), they're more likely to take photos and provide more evidence on site.

PC Member: That's a good point as it offers an incentive for them to gather more evidence.

TAB Member: In support 30cm does algin with the minimum eligibility peat depth for the code which makes sense.

TAB AGREES that standardising 30cm would be appropriate.

7. AOB

TAB Member: I have looked at several planning applications and there is a theme of using the minimum requirements of the Peatland Code to indicate good condition peat.

ACTION: IUCN to include in next version some clarification for definitions or general statement to be released.

Date of next Meeting:

Tuesday August 18, 2026
11am-1pm.