

# **Annex A to the Moorland Association submission to the Environment, Food and Rural Affairs Committee inquiry: Wildfire risk and response 2026**

## **NEER155 correspondence bundle**

### **Purpose of this annex**

1. This document is Annex A to the Moorland Association's submission to the Environment, Food and Rural Affairs Committee inquiry, *Wildfire risk and response*. It provides the introductory note to the Moorland Association's correspondence bundle concerning Natural England Evidence Review NEER155: *An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water*.
2. The purpose of this annex is not to ask the Committee to adjudicate an information-rights dispute. The purpose is to show a wider governance and evidence-assurance issue relevant to wildfire policy: where government or an arm's-length body relies on an evidence review to justify restrictions affecting controlled burning, fuel management and wildfire mitigation, Parliament should be able to scrutinise whether the review's assurance process is transparent, auditable and accurately described.
3. NEER155 is relevant to the Committee's inquiry because it is being relied upon in relation to controlled burning policy, including policy choices that affect fuel management, wildfire mitigation, upland vegetation management, stewardship arrangements and rural businesses. The Moorland Association supports evidence-led policy. However, evidence used to justify restrictions on land-management tools that may affect wildfire risk must be open to proper scrutiny.

### **1. Why this correspondence is included**

4. The EFRA inquiry asks how land management can be used to prevent and control wildfires, how evidence gaps should be filled, how Defra funding schemes should support adaptation, and how government should coordinate a cross-departmental response. The inquiry also asks what policies are needed to reduce wildfire severity and socio-economic impacts.
5. Those questions are directly affected by the evidence base used by Defra and Natural England when deciding whether land managers may use prescribed burning or other fuel-management tools. If an evidence review is used to justify restricting those tools, the Committee is entitled to understand how that review was scoped, appraised, reviewed, signed off and communicated.
6. The correspondence in this annex concerns the public description of NEER155 as having undergone "rigorous peer review" and the retained records said to support that description.

### **2. The core issue**

7. The Moorland Association's concern is not whether Natural England received comments from external experts. The concern is whether the stronger public assurance of "rigorous peer review" can be substantiated by a retained, auditable record showing:
  1. what reviewers were asked to do;
  2. which draft versions or materials they reviewed;
  3. whether they reviewed the full draft report, evidence summaries and study-appraisal material;
  4. how their comments were assessed and addressed;
  5. how independence and conflicts of interest were managed;
  6. how methodology assurance was completed;
  7. when the external review stage was completed and signed off;

8. what documentary basis existed for ministerial, Parliamentary, regulatory or legal reliance on the phrase “rigorous peer review”.
8. This matters because Natural England’s own evidence-review guidance, NEER001, places emphasis on transparency, stakeholder engagement, evidence appraisal, validation, publication and supporting documentation. It defines an evidence review as a systematic and transparent process for bringing together the best available evidence to inform advice, action or policy.

### **3. What Natural England’s EIR response disclosed**

9. Natural England’s response to the Moorland Association’s Environmental Information Regulations request confirmed that, for NEER155:
  - there was no specific written brief, terms of reference or guidance provided to the panel of external reviewers or internal reviewers, other than a request to review the report;
  - there were no review templates, questions, scoring frameworks or checklists for reviewers to complete;
  - there were no documents defining which materials were subject to peer review;
  - individual study quality assessment forms were not sent to reviewers;
  - Natural England did not hold documents confirming completion and sign-off of the peer-review process.
10. Natural England also summarised the process as external scientists with relevant expertise being identified, contacted and asked to review the report, with comments then received, considered and addressed before the report was finalised. The report was also reviewed by Natural England specialists and then passed through Natural England’s publication and assurance process.
11. The Moorland Association does not suggest that such input is irrelevant. The issue is whether it substantiates the stronger public assurance of “rigorous peer review” in the absence of a retained audit trail showing reviewer instructions, scope, materials reviewed, response-to-review records, independence checks and completion/sign-off.

### **4. The subsequent correspondence**

12. Following Natural England’s EIR disclosure, the Moorland Association wrote jointly to Natural England and Defra on 18 February 2026 seeking clarification of the evidential basis for public assurances that NEER155 had undergone “rigorous peer review”. That letter explained the minimum substantiation threshold the Moorland Association considered necessary: a retained record showing which versions were reviewed, what reviewers were asked to do, what comments were received, how those comments were addressed, and who confirmed completion/sign-off.
13. The Moorland Association wrote again on 10 April 2026 after Natural England’s internal review response, raising further concerns about the availability of historic email records, the completeness of the review trail, and the withholding of tracked-change or annotated draft material that may evidence external comments and how they were handled.
14. Natural England responded on 27 April 2026. Its Chief Executive stated that Natural England did not accept the need for corrective action and would not comment further. The response stated that NEER155 followed Natural England’s established evidence-review methodology, that independent expert reviewers provided comments, and that the report also underwent internal technical scrutiny and publication checks.
15. Defra’s Permanent Secretary also responded on 27 April 2026. He stated that NEER155 was produced using Natural England’s established evidence-review methodology, informed by an External Expert Review Group, and subject to internal scrutiny and governance sign-off. Defra said this

provided a sound basis for confidence in the quality and reliability of the review, and stated that it would not enter into further correspondence about NEER155.

16. The Moorland Association then wrote again on 6 May 2026, explaining that the 27 April responses had not resolved the central issue: whether the public assurance of “rigorous peer review” could be substantiated by a retained, auditable record showing reviewer scope, instructions, versions reviewed, response-to-review records, independence checks, methodology assurance and completion/sign-off.

### **5. Relevance to wildfire policy**

17. This is a wildfire issue because evidence reviews such as NEER155 are used in decisions affecting controlled burning, upland vegetation management and practical fuel reduction. Those decisions can affect fuel load, fuel continuity, suppression opportunities, peat ignition risk, smoke exposure, firefighter safety and rural communities.
18. Where a review is relied upon to justify restrictions on fuel-management tools, the Committee should be able to understand:
- how evidence was searched for and selected;
  - how study quality and external validity were assessed;
  - how uncertainty and contrary evidence were treated;
  - what reviewers were asked to review;
  - whether reviewers saw the material necessary to test the conclusions;
  - how comments were addressed;
  - whether independence and interests were managed;
  - whether the review was signed off as complete;
  - whether public descriptions of the review accurately reflect the retained record.
19. The point is not that NEER155 should be disregarded. The point is that wildfire-relevant evidence reviews should not be treated as beyond scrutiny, especially where they inform policy that may restrict fuel-management tools and affect public safety.

### **6. What the Moorland Association asks the Committee to consider**

20. The Moorland Association asks the Committee to consider whether, where evidence reviews are relied upon to justify restrictions affecting wildfire-relevant land management, Defra and Natural England should be expected to retain and disclose, subject to necessary redactions:
1. the review scope and protocol;
  2. reviewer instructions, briefs or terms of reference;
  3. the versions and materials reviewed;
  4. study-appraisal scores and external-validity assessments;
  5. inclusion and exclusion decisions;
  6. reviewer comments;
  7. response-to-review records;
  8. declarations of interest or independence checks;
  9. methodology assurance records;
  10. completion and sign-off records;
  11. the basis for any ministerial, Parliamentary or legal description of the review as “rigorously peer reviewed”.
21. This would not politicise science. It would ensure that evidence used to justify public-safety-relevant restrictions is transparent, auditable and capable of being tested before those restrictions affect fuel continuity on the ground.

## **7. Documents included in this annex**

1. Moorland Association letter to Natural England and Defra, dated 18 February 2026
  2. Moorland Association follow-up letter to Natural England and Defra, dated 10 April 2026
  3. Natural England response from Marian Spain, dated 27 April 2026
  4. Defra response from Paul Kissack, dated 27 April 2026
  5. Moorland Association letter to Natural England and Defra, dated 6 May 2026
22. The correspondence is submitted to assist the Committee's consideration of how wildfire-related land-management policy is informed, scrutinised and communicated. It is intended to support the main submission's recommendation that a national Wildfire Resilience Board should have an evidence-assurance function where reviews are relied upon to restrict fuel-management tools.



## The Moorland Association

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18 February 2026

Dear Marian Spain and Paul Kissack,

**Subject: Clarification sought regarding public assurances of “rigorous peer review” for NEER155**

We write jointly to Natural England and Defra to seek formal clarification regarding the basis upon which Natural England Evidence Review NEER155 (An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water) has been publicly described as having undergone “*rigorous peer review*.”<sup>[1]</sup>

NEER155 has been relied upon in ministerial statements to Parliament and has been referenced in legal proceedings as a peer-reviewed scientific evidence review. It is currently being used to inform regulatory decisions with significant implications for upland land management, stewardship arrangements and rural livelihoods.

In those circumstances, the accuracy and evidential basis of public assurances regarding the robustness of the peer-review process are matters of legitimate public and Parliamentary interest.

We also note the continuing scrutiny by Environment, Food and Rural Affairs (EFRA) committee reviewing Defra and its arm’s-length bodies. We note this includes governance, capability and accountability in regulatory delivery<sup>[2][3]</sup>; this letter seeks clarification squarely within that assurance and accountability frame.

This also engages wider concerns repeatedly examined by Parliamentary committees about governance, assurance and accountability across Defra group bodies, including the need for robust processes and an auditable evidence base where public bodies provide assurances that are relied upon in policy, Parliamentary and legal contexts.

To make this letter easy to navigate, we summarise the issue upfront. Natural England’s Environment Information Regulations disclosures confirm that key artefacts normally expected to evidence a “rigorous peer review” process are not held (review brief, terms of reference, defined scope, structured response tracking, and a formal completion/sign-off record). Against that, NEER155 is

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recorded as Tier 4 (External / independent peer review)[10] and has been relied upon as “rigorously peer reviewed” in ministerial and legal contexts. We therefore set out below a short list of specific confirmations and documents we ask Natural England and Defra to provide, together with a proportionate remedy if the assurance cannot be substantiated on the retained record.

### Meaning of “rigorous peer review” in this context

In this context, we use “rigorous peer review” to mean a process with: (i) a defined scope and reviewer instructions; (ii) reviewer access to the complete draft or a clearly documented subset; (iii) a documented method for recording and responding to comments; and (iv) a recorded completion/sign-off of the external review stage.

For avoidance of doubt, the question is not whether any external comments were received, but whether the description “rigorous peer review” as used publicly (and relied upon in Parliamentary and judicial contexts) denotes a structured, auditable assurance stage that can be substantiated on the retained record.

### Minimum substantiation threshold (retained record)

By “substantiate” we mean that Natural England/Defra can point to a retained record showing: (a) which version(s) were reviewed; (b) what reviewers were asked to do (brief, terms of reference or scope); (c) what comments were received; (d) how those comments were addressed (or why not); and (e) who confirmed completion/sign-off. If those records are not held, then the description “rigorous peer review” cannot reasonably be maintained where the term is relied upon for ministerial, Parliamentary, regulatory, or legal assurance purposes.

On the material disclosed to date, it remains unclear how far these elements were present, evidenced, and recorded for NEER155 - particularly given how the term “rigorous peer review” has been used in Parliamentary and judicial contexts.

### Disclosures under the Environmental Information Regulations (EIR)

Following disclosure under the Environmental Information Regulations, Natural England has confirmed that:

- No written brief, terms of reference or structured guidance was provided to external reviewers.[4]
- No review template, scoring framework or checklist was used.[4]
- No document exists defining which components of the report were subject to external peer review. [4]
- No formal record confirming completion of the peer-review stage is held. [4]
- Drafts circulated to reviewers were incomplete or still under development, with key sections (including Introduction, Methods, Conclusions and Appendices) not initially available.[5]
- Compressed timescales were applied during later stages of review, with reviewers being told that Natural England was “*not expecting further detailed comments*” at a late stage. [5][11]

We also note that the internal circulation of the draft appears to have been framed as a Technical Publications Quality Assurance (TPQA) network clearance exercise, rather than a defined external peer-review process. In the internal circulation email, recipients were told to forward the draft “*to anyone who might have an interest*”[6] and that “*a nil response will be taken as an assumption that you do*

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*not object to the report being published.*”[6] That approach, open-ended onward circulation coupled with a ‘no reply assumes no objection’ - is not a substitute for a structured, auditable peer review with identified reviewers, clear instructions, recorded responses, and documented resolution of comments. It strengthens the need for Natural England and Defra to explain precisely what process is being described publicly as “rigorous peer review”, how it was controlled, who participated, and how substantive challenge was captured and addressed.

Taken together, these disclosures amount to Natural England confirming it does not hold[4] the basic artefacts ordinarily expected to evidence a “rigorous peer review” process - namely: a reviewer brief and or terms of reference; a defined scope of what was reviewed (full draft or subset); a structured method for capturing and responding to comments; and a formal record that peer review was completed and signed off.

In addition, Natural England’s EIR response expressly indicates that key process documents are “not held”[4], including any reviewer brief, terms of reference or guidance; any templates/checklists for reviews; and any document defining what materials (and which versions) were in scope for review. It also states that the individual study quality-assessment forms were *not* sent to reviewers[4]. This matters because, without those underlying assessment materials and a defined review brief/scope, external reviewers could not reasonably be expected to verify how studies were appraised, weighted, or excluded in practice - nor can Defra or Natural England now demonstrate, on the retained record, that the review process met the standard implied by repeated public assurances of “rigorous peer review”.

That is the core discrepancy this letter seeks to resolve: either the process was conducted to a standard consistent with that public characterisation (in which case an auditable record should exist), or the public characterisation should be corrected to reflect what can actually be substantiated on the retained record.

We recognise that external experts were consulted and that comments were received. We also note that NEER155 itself lists an “External expert review group” by name and affiliation. That is welcome, but the publication of names is not the same thing as an auditable peer-review process. In particular, the retained record disclosed to date still does not evidence (i) what those reviewers were asked to do, (ii) which version(s) they saw and whether they saw the complete final draft (or a defined subset), (iii) what comments were provided, and (iv) how Natural England assessed, responded to, and signed off those comments as “peer review” (as opposed to informal input).

Moreover, the disclosure record refers to external inputs beyond the named panel (including a colleague of a panel member, and an additional external reviewer who “*provided comments, edited and proof-read*” the final draft).[4]

Further, the disclosure that an additional external reviewer “*provided comments, edited and proof-read*” the final draft raises a distinct governance issue that goes beyond peer review. Editing/proof-reading the final text can amount to substantive shaping of the document and its evidential framing, and therefore needs to be transparently distinguished from independent peer review. We therefore request clarification of (i) who commissioned this work; (ii) whether it was paid/contracted (and if so on what terms); (iii) what the reviewer was asked to do (peer review, technical review, editorial work, or a mix); (iv) what authority they had to amend text; and (v) how this role was described internally and in any ministerial briefings relying on the term “rigorous peer review”. Without that

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clarity, there is a risk that a hybrid ‘review and editorial’ contribution is being presented publicly as straightforward independent peer review.

On a contentious evidence review that is being relied upon in regulatory and legal contexts, completeness matters: selective or undocumented review inputs are not capable of substantiating the public assurance “rigorous peer review.”

The disclosed correspondence also indicates that at least some external input was necessarily selective and scoped to narrow areas of interest rather than a full review of the report’s methodology and evidential logic. For example, one academic notes that they “*just scanned through the document*”[7] to see whether it mentioned their own specialist area (palaeoecology), and then suggested additional references. Such input can be helpful, but it is not equivalent to an auditable peer review of the study-selection logic, quality appraisal, weighting, and synthesis that underpin NEER155’s conclusions. This reinforces the need to publish the identities and roles of reviewers, clarify what each was asked to do, and distinguish clearly between limited subject-matter signposting and a full methodological peer review capable of substantiating the public description “rigorous peer review.”

However, the combination of (a) “information not held” [4] responses for basic review artefacts and (b) evidence that reviewers were asked to comment on partial drafts and under tight timelines raises substantive questions about whether the process corresponds to the description “rigorous peer review” in the ordinary meaning of that term in scientific and regulatory practice.

In particular, where reviewers are asked to comment on incomplete or evolving drafts[5], and later informed that the organisation is “not expecting further detailed comments” at a late stage, it becomes difficult to see how reviewers could have tested the reproducibility and integrity of the review as an “evidence review” - including the search strategy, inclusion/exclusion logic, study-quality assessments, and the synthesis that underpins conclusions.

This is not merely a theoretical concern. In the internal review correspondence disclosed under EIR, one reviewer explicitly records that they “*haven’t had chance to review every part*”[8] and, critically, that the inclusion/exclusion criteria are not described in sufficient detail for them to “*recreate this review*.”[8] Another reviewer states “*I won’t pretend to have read it end to end*”.[12] One reviewer makes it clear that since “*the full draft has not been completed, so again, it’s hard to give a complete overview*”.[13] These contemporaneous observations from within the review and quality assurance process goes directly to the credibility of subsequent public statements that NEER155 underwent “rigorous peer review” in the sense that an independent expert could verify and replicate the review’s selection logic and overall evidential weight. It underlines why Defra and Natural England should now provide a clear account of what was done to address this replicability deficiency before publication.

If Natural England maintains that the overall process nevertheless met a standard consistent with “rigorous peer review”, we would expect there to have been a defined final-stage review of the complete draft (or a clearly documented subset), with a recorded method for capturing and responding to comments and a clear completion/sign-off record.

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### **Internal standards and what appears to have occurred**

Natural England's own technical publications guidance describes a four-tier quality assurance model, where Tier 4 (External / independent peer review)[9] is the highest level and is intended for high transparency / reputational risk contexts, and is to be carried out by qualified technical experts independent of stakeholder and other interests.

That expectation of independence and auditability is also consistent with wider current thinking on good regulation in the Defra group, which emphasises that regulation should be transparent and accountable as well as proportionate and consistent. Where an "external/independent" Tier 4 assurance is relied upon publicly, the assurance trail should therefore be capable of being evidenced on the retained record, not merely asserted.

That same guidance states that for Natural England Evidence Reviews, the methodology itself needs to be reviewed (at that stage) by a Principal Specialist or a Director/Deputy-Director to ensure it meets evidence review standards, and that confirmation should be included in the Publication Submission Form.

In the disclosed Publication Submission Form for NEER155, the "Level of technical review" is recorded as Tier 4[10], and the form includes a specific question on whether the methodology was reviewed to meet evidence review standards.

We also note that the Publication Submission Form disclosed under EIR records that the submission (dated 06/12/2024) was subsequently "edited" on 18/02/2025,[10] and that the form itself contains multiple preferred publication dates. Given that Natural England appears to rely on this form as part of the evidential basis for publication assurance (including the Tier 4 classification and associated sign-off), it is material to understand what was changed on 18/02/2025, by whom, and for what reason. We therefore request that Natural England disclose a version history (or tracked changes / audit log) for the Publication Submission Form and confirm whether any amendments altered or supplemented the record of the review pathway, methodology review, peer review status, or approvals. In the absence of that, the form cannot safely be treated as a stable, contemporaneous record capable of substantiating the assurance now being relied upon.

Against that background, it is difficult to reconcile with the EIR position that Natural England does not hold basic records typically expected to evidence and substantiate the label being used (brief/scope/instructions, structured process, completion/sign-off record), when:

- a stated Tier 4 / "external/independent" assurance level,
- an evidence-review methodology assurance requirement, and
- an internal process that emphasises audit trail and sign-off.

This creates a straightforward issue of public accountability, either:

- (A) the process was conducted and recorded in a manner consistent with Tier 4/evidence-review standards, in which case supporting artefacts should exist,
- or
- (B) the Tier 4 / "rigorous peer review" characterisation is not evidenced on the retained record.

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### **Alignment with Natural England's Evidence Review Framework (NEER001)**

We anticipate that Natural England may consider that NEER155 was conducted in accordance with its published evidence review guidance (NEER001). We therefore request confirmation of how the peer-review and quality assurance processes applied in NEER155 align with that framework, particularly in relation to:

- methodological assurance prior to publication
- structured and comprehensive external review of the full report (or a documented subset)
- clear communication of scope and assessment expectations to reviewers
- documentary evidence demonstrating how reviewer comments were assessed and addressed, and
- formal confirmation of completion of the external review stage.

In particular, please provide the completed NEER001 compliance record/checklist (or equivalent internal record) for NEER155, or confirm explicitly that no such compliance record exists/was completed, and explain on what documented basis Natural England nonetheless concluded that NEER155 met the relevant NEER001 requirements.

If Natural England's position is that NEER001 compliance was evidenced through informal emails, meetings, or verbal sign-off rather than a completed checklist/record, please provide a collated record (redacted as necessary) identifying: (a) dates; (b) attendees/roles; (c) what specific NEER001 requirements were considered; (d) what versions/materials were reviewed; and (e) the recorded decision that NEER001 requirements were met. If no such collated record can be provided, please confirm explicitly that Natural England holds no documentary record evidencing NEER001 compliance for NEER155 beyond the Publication Submission Form and the materials already disclosed.

### **What we are asking you to provide or confirm**

We request that Natural England and Defra provide the following within 20 working days.

#### **1) QA / peer review level applied (and basis)**

- 1.1 Confirm the QA/peer review level applied to NEER155, including whether it was treated as Tier 4 external/independent peer review (or equivalent), and the basis for that classification.
- 1.2 Provide the NEER155 Publication Submission Form pack in full (including any annexes/attachments submitted with it), and confirm whether the disclosed form is complete.
- 1.3 Confirm who reviewed the methodology to ensure it met evidence review standards, when that review occurred, and what was reviewed (eg. protocol/search strategy/inclusion criteria). Provide any record of that review (email/meeting note/recorded decision), with names redacted if necessary.

#### **2) Scope, versions sent, and timeline**

- 2.1 Provide the scope and timeline of external review. What versions were sent, on what dates, and whether reviewers saw the full draft (including Introduction, Methods, Conclusions and Appendices).

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- 2.2 Where reviewers were asked to comment on partial or “drafty” [11] versions, please confirm how Natural England ensured the final full draft was reviewed to a standard consistent with the phrase “rigorous peer review,” and what evidence exists of that.

### 3) Audit trail of responses and completion/sign-off

- 3.1 Describe the process used to record, assess and respond to reviewer comments (including whether a response log existed; if not, confirm that none exists and explain what alternative mechanism was used).
- 3.2 Provide records evidencing completion and sign-off of the external review stage, including any “ready to publish” clearance and/or documented decision that peer review was complete.

If any item requested at 3.1 and 3.2 is said not to be held, please additionally confirm which of the following applies (and why): (i) the record was never created; (ii) it was created but is no longer retained (and on what authority/retention rule); (iii) it exists but is held in another system/custodian; or (iv) it exists but is being withheld (and the legal basis). Please also confirm where such records are required or expected to be kept under Natural England’s Technical Publications process, and whether the absence of those records represents a departure from that process for this publication.

- 3.3 Provide the record of the internal cross-cutting review set-up (including the dates and the list of “report approvers” recorded in the Publications Database entry), with names redacted if necessary but roles/titles and dates retained.
- 3.4 Provide evidence of Evidence Director final sign-off (or confirm whether it was obtained and how it was recorded).
- 3.5 External review artefacts (comments and Natural England response record): Please provide the retained external reviewer comments and Natural England’s responses/changes (eg. response-to-review log, tracked-changes drafts, annotated PDFs, compiled comment sheets, or email threads evidencing comments received and how they were addressed), redacted as necessary for personal data. If no such record exists, please confirm explicitly that Natural England does not hold any retained record capable of evidencing (i) what external comments were made and (ii) how they were evaluated and actioned prior to publication.

### 4) Reviewer independence / conflicts (given Tier 4 implications)

- 4.1 Confirm whether any conflict-of-interest declarations or independence checks were sought or recorded for external reviewers, and if so provide the policy/process and a redacted record that the checks occurred.

Given that NEER155 is recorded as Tier 4 (“External / independent peer review”) and has been publicly relied upon as “rigorously peer reviewed”, it should be possible to evidence what steps were taken to ensure reviewer independence from stakeholder and other interests (and to manage any conflicts), even if the names themselves are redacted.

If no such steps were undertaken or recorded, please confirm that explicitly and explain how the Tier 4 / “external/independent” designation was nevertheless justified.

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4.2 The disclosed material indicates that some external input involved purchase-order/paid review arrangements in earlier related review correspondence,[14] and that an additional external reviewer “provided comments, edited and proof-read the final draft report.”[4]

Please clarify:

- which external contributions were paid/contracted
- whether any reviewer had a role extending beyond peer review (eg. editing/proofreading), and
- how those roles were described to Ministers when the term “rigorous peer review” was used.

4.3 Completeness of external contributions (to rule out selectivity). Please confirm the complete list of *all* external contributors who provided substantive input on draft(s) of NEER155 (including, but not limited to, the named External expert review group, the colleague of a panel member referenced in disclosure, and the additional external reviewer who “provided comments, edited and proof-read” the final draft). For each contributor, please confirm: (i) their affiliation; (ii) the capacity in which they contributed (peer review / technical review / editorial / proofing); (iii) what they received (which version(s) and which sections); and (iv) the dates of transmission and return.

### 5) Basis for ministerial assurances and corrections if not substantiated

5.1 Identify the documentary basis on which the description “rigorous peer review” was provided to Ministers (including the specific wording used in briefings), who cleared it, and whether it relied on the Tier 4 classification and/or the Publication Submission Form.

Please provide the relevant ministerial submission(s)/briefing note(s)/lines-to-take (or a redacted extract showing the exact wording in context), together with the document references, dates and version control identifiers. If the wording appeared in multiple briefings, please provide a list of each instance (date, audience, document title) and identify the originating “source of truth” text from which the wording was propagated.

5.2 Please confirm either:

- (A) Defra considers the description “rigorous peer review” substantiated on the retained record, and identifies the specific retained documents that substantiate it; or
- (B) Defra does not consider it substantiated on the retained record, and will therefore: (i) set out the exact correction Defra/Natural England will issue, (ii) identify the forum(s) in which the assurance has been relied upon (including any ministerial/Parliamentary usage), and (iii) provide a date by which the correction will be made.

If Defra is unable to identify a clear documentary basis that substantiates the phrase “rigorous peer review” as used in ministerial briefings, please confirm whether Defra will (i) correct the record in the relevant forum(s) (including, where applicable, the Parliamentary record), and (ii) ensure that any future references to NEER155 accurately describe the assurance that can be evidenced on the retained record.

Please also confirm the specific internal search locations/record systems checked in Defra and Natural England when determining what evidence exists to substantiate that ministerial assurance.

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Given the weight the term “peer reviewed” carries in scientific, policy and legal settings, Defra should ensure that any ministerial briefing language asserting “rigorous peer review” is capable of being evidenced by the retained record, and that any uncertainty is clearly caveated rather than asserted as assurance.

For avoidance of doubt: this is not a semantic issue. The term “peer-reviewed” carries weight in scientific, policy and legal settings. When such terminology is relied upon in Parliament and before the Court, it must be capable of being substantiated by reference to a clear and documented process.

### **Constructive remedy (if the process cannot be evidenced)**

To help resolve this proportionately, we set out two alternative remedies: (a) a minimum remedy focused on correcting the public/ministerial description to reflect what can be evidenced on the retained record; and (b) a maximum remedy focused on remedying the underlying assurance gap through a clearly scoped external peer review of the complete final draft, with an auditable record of reviewer comments and Natural England’s responses. Either route would restore clarity and accountability in how NEER155 is represented and relied upon.

In the absence of retained records sufficient to substantiate “rigorous peer review”, the default and proportionate minimum remedy is to withdraw or correct that description wherever it has been used, and to re-describe NEER155 accurately in terms of the assurance trail the retained record can evidence.

If the process cannot be evidenced to a standard consistent with “rigorous peer review” (as used publicly), we invite Natural England and Defra to confirm whether they will either:

- re-describe NEER155 as “externally reviewed” (rather than “rigorously peer-reviewed”), or
- commission a clearly scoped external peer review of the final full draft (with written terms of reference and a recorded response-to-review log, redacted where necessary).

### **Transparency**

In the interests of transparency, we intend to publish this correspondence in due course.

We would therefore welcome a clear and detailed written response within 20 working days. If any requested item is said not to be held, please also confirm the searches undertaken and where such records would ordinarily be kept under Natural England’s technical publications process.

Yours sincerely,

**Andrew Gilruth**  
Chief Executive  
Moorland Association

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



## The Moorland Association

### Cc:

- 1) Mary Creagh CBE MP, Parliamentary Under-Secretary of State (Minister for Nature), Department for Environment, Food and Rural Affairs.
- 2) Professor Anjali Goswami, Chief Scientific Adviser, Department for Environment, Food and Rural Affairs.

### Sources:

- [1] Parliamentary Question, answered by Mary Creagh CBE MP, Parliamentary Under-Secretary of State (Minister for Nature), Department for Environment, Food and Rural Affairs on 23 Dec 2025 <https://questions-statements.parliament.uk/written-questions/detail/2025-12-16/100702/>
- [2] EFRA 2026 enquiry into Environmental Regulation <https://committees.parliament.uk/work/8598/work-of-the-department-and-its-armslength-bodies>
- [3] Defra Accounting Officer system statement 2025 (Published 2 February 2026) <https://www.gov.uk/government/publications/defra-accounting-officer-system-statement-2025/defra-accounting-officer-system-statement-2025>
- [4] EIR2026/00223: NE EIR letter of response, dated 5 Feb 2026 (attached as Annex A).
- [5] EIR2026/00223: NE email to external reviewer, dated 23 Sep 2024 (attached as Annex B)
- [6] EIR2026/00223: NE internal email to staff, dated 6 Dec 2024 (attached as Annex C)
- [7] EIR2026/00223: External reviewer email to NE, dated 8 Nov 2024 (attached as Annex D)
- [8] EIR2026/00223: External reviewer email to NE, dated 24 Dec 2024 (attached as Annex E)
- [9] EIR2026/00223: NE Technical Publication, last updated, 18 Apr 2024 (attached as Annex F)
- [10] EIR2026/00223: NE Publication Submission Form, dated 6 Dec 2024 (attached as Annex G)
- [11] EIR2026/00223: NE email to external reviewer, dated 7 Nov 2024 (attached as Annex H)
- [12] EIR2026/00223: External reviewer email to NE, dated 10 Nov 2024 (attached as Annex I)
- [13] EIR2026/00223: External reviewer email to NE, dated 14 Mar 2024 (attached as Annex J)
- [14] EIR2026/00223: NE email to external reviewer, dated 5 Mar 2024 (attached as Annex K)

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



05 February 2026

Foss House  
Kings pool  
1-2 Peasholme Green  
York  
YO1 7PX

Andrew Gilruth  
[agilruth@moorlandassociation.org](mailto:agilruth@moorlandassociation.org)

Dear Mr Gilruth

## Access to Information Request – Request no EIR2026/00223

Thank you for your request for information, which we received on 8 January 2026. Your request has been considered under the Environmental Information Regulations 2004 (the EIRs).

You asked for the following information:

**I am seeking information relating to the peer-review process used for Natural England Evidence Review NEER155 (“Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity, carbon and water”).**

Draft copies of the report were reviewed by a panel of external reviewers. The report was also peer reviewed internally within Natural England.

**Please provide the following:**

### **1. Peer-review framework and scope**

#### **a) Any written brief, terms of reference or guidance provided to peer-reviewers for NEER155.**

There was no specific brief, terms of reference or guidance provided to the panel of external reviewers, or internal reviewers, other than a request to review the report. Therefore, Regulation 12(4)(a), Information not held, applies.

#### **b) Any review templates, questions, scoring frameworks or checklists used as part of the peer-review process.**

There were no review templates, questions, scoring frameworks or checklists for reviewers to complete. Therefore, Regulation 12(4)(a), Information not held, applies.

#### **C) Documents defining which materials were subject to peer review, including whether this included:**

- \* the full draft report,
- \* evidence summaries, and/or
- \* study quality or ranking assessments.

There were no documents defining which materials were subject to the peer review. Therefore, Regulation 12(4)(a), Information not held, applies.

However, we can confirm that reviewers were sent draft copies of the report. Scores for study quality (internal validity) and external validity were included in the report text. Individual study

quality assessment forms were not sent to reviewers. We interpret 'evidence summaries' to refer to sections 4-11 'summaries of recent evidence'. These formed part of the draft report which was reviewed.

## **2. Peer-reviewers**

### **a) The number of peer-reviewers involved.**

Five reviewers made up the external expert panel. A colleague of one panel member contributed additional comments on specific aspects of the report. Nine members of Natural England staff also provided comments on drafts of the report. A final, additional external reviewer provided comments, edited and proof-read the final draft report.

### **b) For each reviewer, their institutional affiliation at the time of review (names not required).**

Details of the external expert panel are provided in NEER155 on page 3 under the heading 'External expert review group' ([An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water - NEER155](#)). Details of other reviewers who provided comments are given in on page 3 under the heading 'Acknowledgements'.

## **3. Governance and sign-off**

### **a) Documents describing the internal governance or quality assurance process used to manage peer review for NEER155.**

The NEER155 report followed the Natural England's standard process for technical publications. The internal guidance for this process is documented and provided in the attached zip file named 'EIR2025\_00223 Internal'. The Publication Submission form is also attached providing information in scope of your request regarding the QA process. Some of the information is redacted as it falls under EIR Regulation 12(3) – Prohibition on disclosure of personal Information. See further details regarding this exemption in Annex A below. [Please Note: NE disclosed 145 pages of information in this EIR. The Annexes to the Moorland Association letter, are its own Annexes and these are elements of that full EIR contents. All 145 pages are available if Defra or NE wish to see them]

To summarise the peer review process, external scientists with relevant expertise were identified, contacted and asked if they would review the report, then they were sent the draft. Comments were received back, considered and addressed before the report was finalised. The draft report was also reviewed by a number of Senior Specialists within Natural England. The final report was signed off / approved by a Principal Specialist within Natural England. The report was then subject to the Natural England internal Technical Publications Cross Cutting Assurance Network review before final sign off for publishing.

### **b) Records confirming completion and sign-off of the peer-review process.**

Natural England has undertaken a search and can confirm that it does not hold documents confirming completion and signoff of the peer-review process. However, we can provide correspondence confirming that individuals completed their reviews and provided their comments. These are provided to you in both the attached zip files (split by External and Internal). Some of the information is redacted as it falls under EIR Regulation 12(3) – Prohibition on disclosure of personal Information. See further details regarding this exemption in Annex A below.

Please note that the information we have supplied to you is subject to copyright protection under the Copyright Designs and Patents Act 1988. You may re-use this information (not including logos) free of charge in any format or medium, for the purposes of research for non-commercial purposes, private study, criticism, review and news reporting. You must re-use it accurately and not in a misleading context. The material must be acknowledged as Natural England copyright, and you must give the title of the source document/publication. However, if you wish to re-use all or part of this information for commercial purposes, including publishing and the information is not covered by the [Open Government Licence](#) you will need to apply for a licence. Applications can be sent to Enquiry Service, Natural England, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX.

This information may also contain third party copyrighted material and you will need to obtain permission from the copyright holders concerned before you re-use it.

As you may be aware, under the legislation should you have any concerns with the service you have received in relation to your requests and wish to make a complaint or request a review of our decision, please contact [foi@naturalengland.org.uk](mailto:foi@naturalengland.org.uk) and we'll arrange for a colleague to conduct an internal review. Under Regulation 11(2) this needs to be done no later than 40 working days after the date of this letter.

If you are not content with the outcome of that complaint or the internal review, you may apply directly to the Information Commissioner for a decision. Generally, the Commissioner cannot decide unless you have exhausted the internal review procedure provided by Natural England. The Information Commissioner can be contacted at: <https://ico.org.uk/global/contact-us/> or call on 0303 123 1113 (local rate), [www.ico.org.uk](http://www.ico.org.uk).

Yours sincerely

Access to Information Team  
Legal, Governance and External Affairs  
Natural England  
[foi@naturalengland.org.uk](mailto:foi@naturalengland.org.uk)

Enc

## **Annex A (NE's internal Annex A to its EIR letter )**

### **Regulation 12(3) - Personal Information**

The names, signatures, contact details and other identifiers of private individuals and staff members in certain circumstances are considered by Natural England to be personal information as defined by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The First Data Protection Principle says that personal data shall be processed lawfully, fairly and in a transparent manner. Guidance published by the Information Commissioner, states that when considering fairness in relation to disclosing personal information under FOIA and EIR it will usually mean considering:

- whether the information is sensitive personal data;
- the possible consequences of disclosure on the individual;
- the reasonable expectations of the individual, taking into account: their expectations both at the time the information was collected and at the time of the request; the nature of the information itself; the circumstances in which the information was obtained; whether the information has been or remains in the public domain; and the FOIA and EIR principles of transparency and accountability; and
- any legitimate interests in the public having access to the information and the balance between these and the rights and freedoms of the individuals who are the data subjects.

When personal information is collected from individuals by Natural England, we do not inform them that the information will remain confidential or that it may be released, however, we believe that there is an expectation of confidentiality.

We consider that there is no overriding legitimate interest in the personal information being made public.

The release of personal information and any subsequent contact may cause unnecessary or unjustified distress or damage to the individuals if released. Natural England is, therefore, satisfied that the redacted parts of the information requested fit the definition of personal data and that its release would be 'unfair' under the meaning of the first Data Protection Principle and should not be released.

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: NE burning evidence review update [notification to external reviewers of revised timescale and responses]  
**Date:** 30 September 2024 10:38:49

---

[REDACTED] for info.

Just to let you know that I emailed the external expert reviewers for the burning ER update report last week to inform them of the revised timetable (see below).

So far, I've had responses back from three of the five reviewers which were generally positive over being able to respond relatively quickly after receiving the report around 14 October as follows: [REDACTED] "No problem - will await the document"; [REDACTED] "Hopefully that should be ok - thanks for the advance warning"; and [REDACTED]: "Good to hear from you. I'd be happy to give it a final review from the 14<sup>th</sup> October. I'm away [REDACTED] [REDACTED] [REDACTED] anyway so the two week timetable fits nicely".

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 23 September 2024 15:32  
**To:** [REDACTED]  
**Subject:** NE burning evidence review update

Hi [REDACTED]

Apologies for the delay in providing an update on the burning evidence review update.

As you may have guessed, progress has been delayed for a variety of reasons, but this is to let you know that the aim is to send a complete version for a technical edit and proof reading around 14 October with a target turnaround of two weeks.

Due to time pressure to publish the report, our intention is to also send it to you and the other reviewers, including internally, at the same time. It would be very helpful if you could add any final comments quickly, ideally to the same timescale. Bearing in mind the technical edit and proof reading being undertaken and that you have already commented on much of the main part of the text, **we are not expecting further detailed comments at this stage**. Rather we want to give you the opportunity to see the final version and make any more major comments you may have.

We realise that you may not be able to comment to this tight timescale. I would be grateful if you could let me know if this is the case so that we can consider how we might be able to address this when I return from leave next week.

Thank you for your inputs to the review to date.

Best wishes



Sent from [Outlook for iOS](#)

# Annex C

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: NEER155 / TP7022: Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity, carbon and water  
**Date:** 20 December 2024 15:47:18  
**Attachments:** [NEER155 - FINAL DRAFT - 06-12-2024 - Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity carbon and water - ian C v1.docx](#)  
[image001.png](#)

---

Hi

Here is some comments and thoughts, happy to discuss in next year

Have a great Christmas

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 06 December 2024 08:56  
**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** NEER155 / TP7022: Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity, carbon and water

Dear All,

Technical report **NEER155 Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity, carbon and water** is under review from **06/12/2024 to 27/12/2024**. A copy of the report is attached.

Please submit any responses by adding comments to the Word document and returning to me by **06/01/2025**. Please do not make changes to the document itself.

Note: only respond if you are providing constructive feedback. **A nil response will be taken as an assumption that you do not object to the report being published.**

If you receive this email as Bcc you are a member of the [Technical Publications Quality Assurance Network](#). If you would like to remove yourself from the network you can do this on the network page or contact NE Publications ([publications@naturalengland.org.uk](mailto:publications@naturalengland.org.uk)).

**Please forward this email to anyone who might have an interest in this report.**

Many thanks,

[REDACTED]

[REDACTED]

Specialist – Upland Habitats  
Science / Chief Scientists Directorate  
Natural England

[REDACTED]

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

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In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

# Annex D

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: NE burning evidence review update  
**Date:** 08 November 2024 14:38:08  
**Attachments:** [Burning ER late draft revised update 5nov24 jw.docx](#)

---

Dear [REDACTED]

Many thanks for including me in this email. I missed the original email from [REDACTED] on this report because I was on [REDACTED]

I have just scanned through the document looking for mention of palaeoecology specifically, as this is my research area. I think some really useful trends have been identified from the studies included and the summaries are useful. There are many other palaeoenvironmental studies that could be of interest.

We include and present charcoal fragment counts in all pollen studies, but the word “fire” or “burning” may not appear in the title of the paper because it hasn’t been the main focus of the study, but the charcoal data are still presented and are part of interpretations. I’ve attached a few papers that may be relevant:

- A really useful study by Althea Davies (2016) for the Peak District that shows vegetation regime shifts following fire events and the point at which shifts can become permanent in a landscape.
- I’ve also attached a paper from work Ralph Fyfe and I carried out in Wales where charcoal records are included for 5 peat coring sites (Woodbridge et al., 2012)
- and another based on a sediment core from a reservoir on Dartmoor (Woodbridge et al., 2014).
- I’ve also been carrying out on-going work on peatland fire in the palaeo record in the Peak District. At the moment this is unpublished, but I can share findings if this is useful.

While searching for palaeoecology sections in the report, I made a few small edits to the attached version just in case this is useful. One thing I noticed is that ‘paleo’ has been spelt using the USA spelling instead of UK spelling ‘palaeo’. Pollen records capture vegetation change up to around a 5 km area surrounding the coring site (depending on the openness of the landscape), but charcoal records are likely more local to the coring location.

I noticed the report is also about biodiversity. Understanding the drivers of past biodiversity trends has been a recent focus of our palaeoecological research. I’ve attached 2 papers that make use of ~300 UK pollen datasets and other palaeo archives to explore biodiversity trends and historic drivers in case this is of use. Perhaps it would be worth mentioning in the report somewhere that palaeoenvironmental data could also have potential to inform on biodiversity management.

I hope some of this is useful. Please let me know if any further information would be helpful.

Best wishes,

[REDACTED]

-----  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]@naturalengland.org.uk>

**Sent:** Thursday, November 7, 2024 10:01 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: NE burning evidence review update

Hi [REDACTED]

With apologies for the further delay, attached is a relatively near complete but not yet edited, so still quite a 'drafty' version of the upland peatland burning evidence review update report.

There are a few sections that still need reviewing internally and in places completing, especially the appendices, and the whole report is still undergoing an edit, proof-read and further consideration of comments. The 'evidence statements' in Section 13 Summary and conclusions have only just been drafted (and are still to be done for vegetation and wildfire) so will be further reviewed.

As I previous mentioned, we are not expecting further detailed comments at this stage. Rather we wanted to give you the opportunity to see a more complete version and to make any more major comments you may have.

There is pressure to complete the report as soon as possible, so I'm sorry to say that we will need any comments by the middle of next week (of 11 November) if we are to be able to take them into account before it goes into our internal publication process/review. Apologies if this short timescale doesn't give you time to comment further, but no problem if this is the case. Nevertheless, if there are any major thing(s) of concern after next week then please still let me know anyway.

I've copied [REDACTED] in on this as some time ago she asked my colleague, [REDACTED], about the review and he suggested that I would send her a copy. Clearly it's still a draft but I'll send you both a copy when it's finalised.

# Annex E

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: NEER155 / TP7022: Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity, carbon and water  
**Date:** 24 December 2024 17:05:41  
**Attachments:** [image001.png](#)  
[NEER155 - FINAL DRAFT - 06-12-2024 - Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity carbon and water \[REDACTED\] CrossCuttingReview.docx](#)

---

Hi [REDACTED]

Thanks for sending this round. I attach the report with my comments. I would caveat my comments on the document with that they were done as I read – so very much an instinctive view – and in the main suggestions for changes. I have not had the chance to review every part of the doc given its length and the time I had to do it but have spent the best part of today on it (not a brag honest – just to give context).

There are a few things that do need addressing so do please come back to me if you need help on that – some are obvious like Table numbers etc.

In terms of reviewing this for publication and any associated risk I would make the following comments:

1. The review is expertly conducted, with methods by and large very clearly explained. I have made some suggestions where a few tweaks could be made to tighten this up as methodology is a clear place where folks can pick apart the findings. I'd be especially keen to see some greater description of the inclusion and exclusion criteria as I didn't get a feel that I could recreate this review based on that section.
2. The review is extensive, sets out the questions well and is apparently comprehensive in its narrative. This results in a long review with lots of narrative. While this is ostensibly a good thing, as we do need to say what the studies have shown – the amount of narrative will potentially open opportunities for others to critique what we have said. I do welcome this in many ways – it is the scientific method after all -but we should be aware of that and prepare for it.
3. Building on this – I found section 12 and 13 summarising the evidence and conclusions to be brilliant. This is especially true of section 13 – I just wish I had read it sooner right at the beginning of the report. And then let the narratives fill in the gaps for me where I wanted or needed. I want to know right away that the Butler did it! Please consider how this could be achieved. Also on section 12 – I think we could make our assessment of the confidence of the evidence in the table much clearer here – we use the word strong on some occasions but don't describe it on others. Can this be addressed- perhaps by adding a column to describe this in the terms described elsewhere in the report.
4. Finally again building on that. I want to know at the end of each relevant section how well the question has been answered (for example the end of section 4, 5 onwards etc). Given the size of the review many folks may just jump to the relevant section. Using the stuff from section 13 again would help here. I almost don't mind repeating it in these sections even though we have summarised it brought it together.

5. Finally - and outside the scope if this review – [REDACTED]

See you in 2025!

**From:** [REDACTED]

**Sent:** 06 December 2024 08:56

**To:** [REDACTED]

**Cc:** SM-NE-Publications (NE); [REDACTED]

SM-[REDACTED]

**Subject:** NEER155 / TP7022: Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity, carbon and water

Dear All,

Technical report **NEER155 Update to Natural England Evidence Review on the effects of burning on upland peatland biodiversity, carbon and water** is under review from **06/12/2024 to 27/12/2024**. A copy of the report is attached.

Please submit any responses by adding comments to the Word document and returning to me by **06/01/2025**. Please do not make changes to the document itself.

Note: only respond if you are providing constructive feedback. A nil response will be taken as an assumption that you do not object to the report being published.

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Please forward this email to anyone who might have an interest in this report.

Many thanks,

[REDACTED]  
Specialist – Upland Habitats

Science / Chief Scientists Directorate

Natural England

[REDACTED]  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

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In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

## Page 1 - Technical publications – self service guidance

**This page provides guidance on how to create and publish Natural England technical publications. Preparing evidence reports for publishing is now a self-service process.**

# TECHNICAL PUBLICATIONS SELF SERVICE TOOLKIT

Outputs for all our evidence projects should be published in the appropriate format and to the appropriate standard. We want to be transparent and open about our evidence and ensure that our published evidence can be used by others to benefit the environment. This document has been produced for Project Officers to assist in publishing their own evidence.

*Click on the steps to open the guidance.*

## STEP ONE

I HAVE A REPORT TO PUBLISH - WHAT DO I NEED TO KNOW?

## STEP TWO

REGISTERING ON THE TECHNICAL INFORMATION EXCHANGE

## STEP THREE

WHAT CATEGORY DOES MY REPORT FALL INTO?

## STEP FOUR

BRANDING

## STEP FIVE

DEFRA PRESS OFFICE AND THE PUBLICATION PROFORMA

## STEP SIX

SETTING UP EVIDENCE PROJECT & PUBLICATION DATABASE & TRIM

## STEP SEVEN

CROSS CUTTING REVIEW

## STEP EIGHT

FINAL SIGN OFF

## STEP NINE

ACCESS TO EVIDENCE CATALOGUE & PUBLISHING

## STEP TEN

AFTER PUBLISHING

## STEP ELEVEN

COMMUNICATING OUR EVIDENCE



TECHNICAL  
PUBLICATION  
LINKS


Whenever possible our evidence should be published externally in the appropriate format and to the appropriate standard, not just to support our work, but also so it can be used by others to benefit the environment. It is extremely important that our

evidence is published and made available to not only the organisation but the public.

### **Accessibility guidance**

All documents published on the Access to Evidence catalogue from 23rd September 2018 **must now be accessible**. This is not just good practice, it is a legal requirement. If you ask us to publish a document that is not accessible, publication will be delayed until the issues are fixed or we may be unable to publish in that format.

The Accessibility documents policy and statement can be found at:

<https://www.gov.uk/government/organisations/natural-england/about/accessible-documents-policy> 

Guidance on producing an accessible publication is provided at [Step Four - Publishing standards](#) and further guidance on accessibility is on the Defra intranet at:

<https://intranet.defra.gov.uk/how-to/correspondence/publishing-govuk-intranet/publishing-standards/accessibility/>

**This guidance must be followed in the order it is displayed below.** Please read the guidance fully before contacting the Publications mailbox ([publications@naturalengland.org.uk](mailto:publications@naturalengland.org.uk)) with any queries.

### Technical Publications Self Service Steps

[Natural England Technical Publications - Step One - The technical review](#)

[Natural England Technical Publications - Step Two - TIE Registrations](#)

[Natural England Technical Publications - Step Three - Report types](#)

[Natural England Technical Publications - Step Four - Publishing standards](#)

[Natural England Technical Publications - Step Five - the publication submission form](#)

[Natural England Technical Publications - Step Six - Setting up Evidence Project Database, Project Database, and Report Number](#)

[Natural England Technical Publications - Step Seven - Cross Cutting Review](#)

[Natural England Technical Publications - Step Eight - Final Sign Off](#)

[Natural England Technical Publications - Step Nine - Access to Evidence catalogue and publishing](#)

[Natural England Technical Publications - Step Ten - After publishing](#)

[Natural England Technical Publications - Step Eleven - Communicating our Evidence](#)

[Natural England Technical Publications - Technical Publication Links](#)

# Natural England Technical Publications - Step One

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- [Discuss this wiki](#)
- [Edit wiki content](#)
- [Print](#)
- [Wiki alert](#)

## Step One - The technical review

This section provides details on the 'technical review', the first stage of the publications process that every technical report must go through prior to publishing on the [Natural England Access to Evidence Catalogue](#).

The purpose of the technical review is to ensure the report is technically correct and robust. As Project Officer you should agree with the Senior Responsible Officer (SRO) what level of quality assurance a project should be working to. **This should be agreed as part of the project development and approval process before the work begins.** For more information on the role of the Project Manager and SRO see the [project management page](#).

For projects that have already begun please consider, and agree, the level of quality assurance that should apply, at the earliest practical stage. Where contractors are employed, the contract should state that before a report is accepted by Natural England, a draft should be submitted for technical review. Work should not be accepted and paid for until it has been technically reviewed and any necessary amendments made.

### The 4-tiered approach to quality assurance

The quality management standard sets out a 4-tiered approach to quality assuring our work: self-assessment, internal peer review, high level internal peer review, and external/independent peer review. It is important to note that the higher levels of quality assurance should be preceded by lower tiers, for example self-assessment and internal peer review precede high level internal peer review. The final level you decide to use will vary depending on the circumstances. Non contentious work that

is using existing survey or scientific methods will need a lower level of review than contentious or novel work.

It is your responsibility to identify who will carry out the assurance and to request time from them to do this. If you cannot find an expert in the specific subject of the report for internal review then contact Natural England principal and senior specialists who will at least be able to comment on methods, procedures and the robustness of the evidence.

### **Tier 1: Self-assessment**

This is appropriate for routine work which is of low impact and risk. This level of quality assurance will be used by everyone in the first instance to check the quality of the work. It is not sufficient for technical publications.

### **Tier 2: Internal peer review**

All publications published on the Access to Evidence Catalogue require at least this level of review. The quality assurance will be carried out by one or more colleagues with relevant expertise, such as a team/expert/specialist, an expert/specialist from another team or the line manager/team leader.

### **Tier 3: High level internal peer review**

Most technical reports will require this level of quality assurance before publication, which is for projects with a high potential impact or risk. This is generally undertaken by an expert outside of the immediate area of work, including a Principal Adviser/Specialist, the High Risk Case Panel, an appropriate Manager, Director/Deputy-Director of the Chief Scientist Directorate.

### **Tier 4: External / independent peer review**

External / independent peer review is the highest level of quality assurance. It should be used where there is a high level of transparency required due to the potentially high impact of the publication, including where there is a risk to our reputation or a high level of novelty or technical difficulty. It will be carried out by qualified technical experts and be independent of stakeholder and other interests.

## **Natural England Evidence reviews**

For Natural England Evidence Reviews, the methodology itself also needs to be reviewed at this stage by a Principal Specialist or a Director/Deputy-Director in the Chief Scientist Directorate to ensure it meets evidence review standards.

Confirmation that the methodology has been reviewed and approved should be included in the 'Publication Submission Form' submitted at [Step 5](#).

Where the methodology used does not meet the standards required for an evidence review, it may be possible to publish the report as a different publication type, such as a commissioned or joint report instead.

Next step: [Step Two: Technical Information Exchange registrations](#)

Back to the [Technical Publications guidance homepage](#)

*Last updated 2024/04/18 by* 

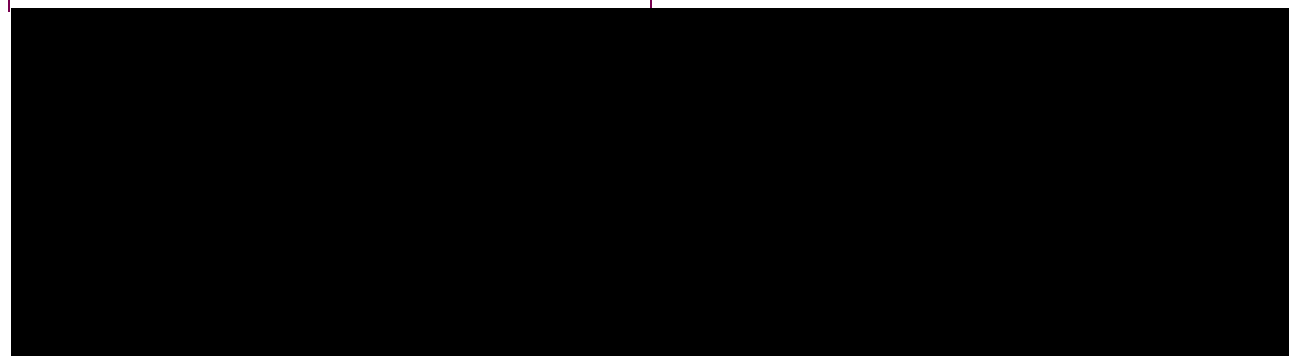
## Publication submission form

### Submission details

<b>NE Project Manager Name</b>	[REDACTED]
<b>Report contact</b>	[REDACTED]
<b>Date of submission</b>	06/12/2024 (edited 18/02/2025)

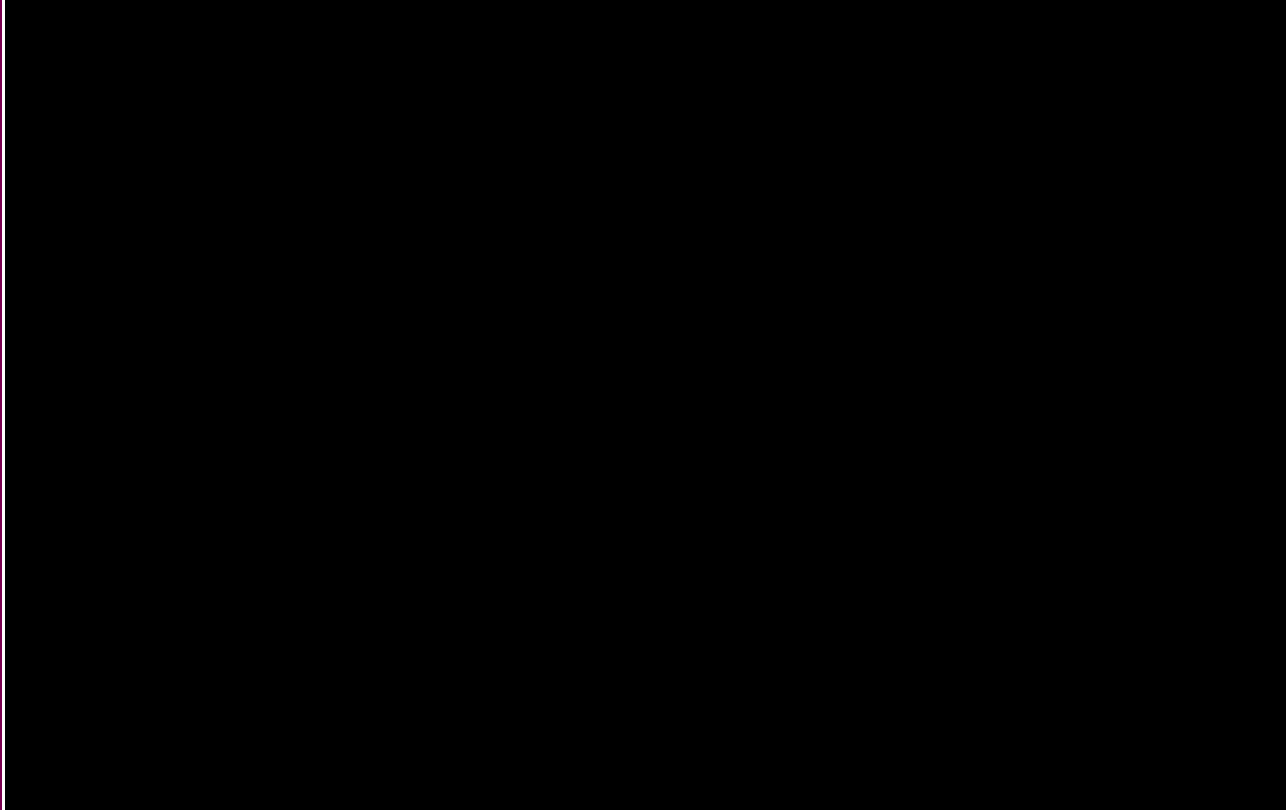
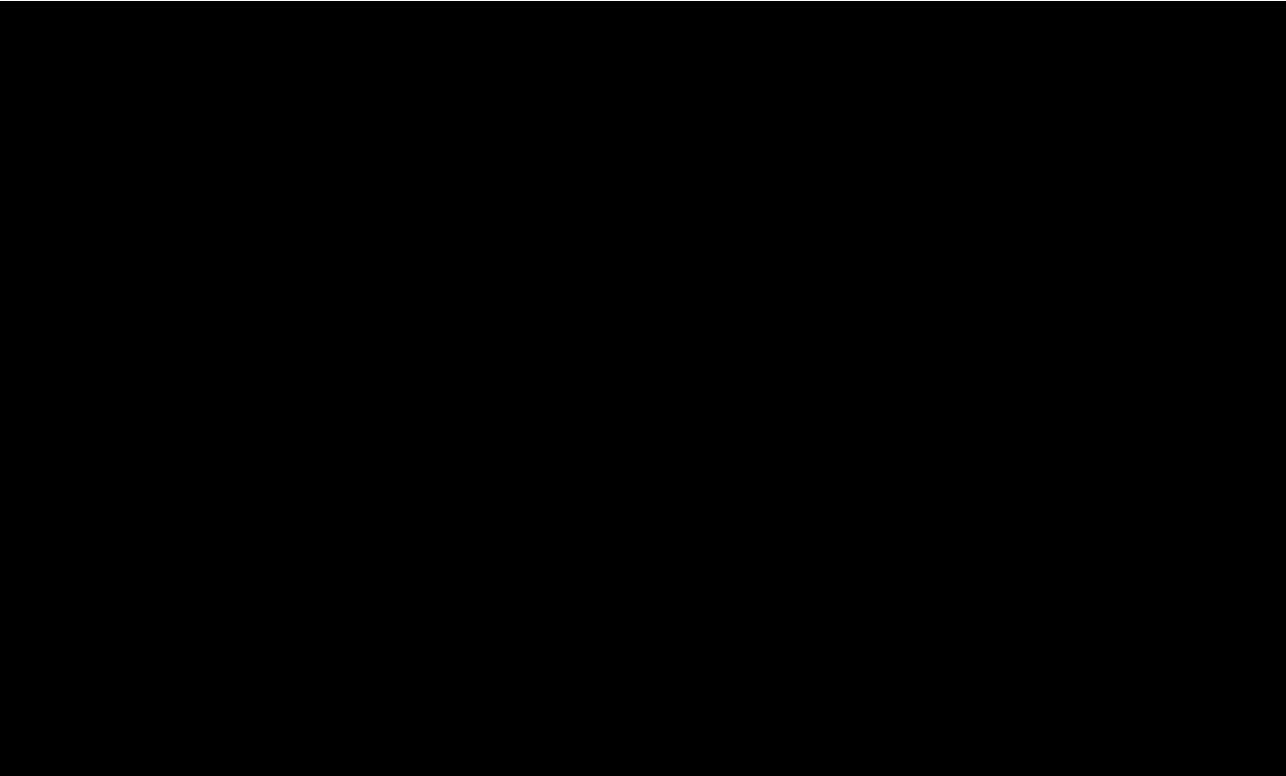
### Report details

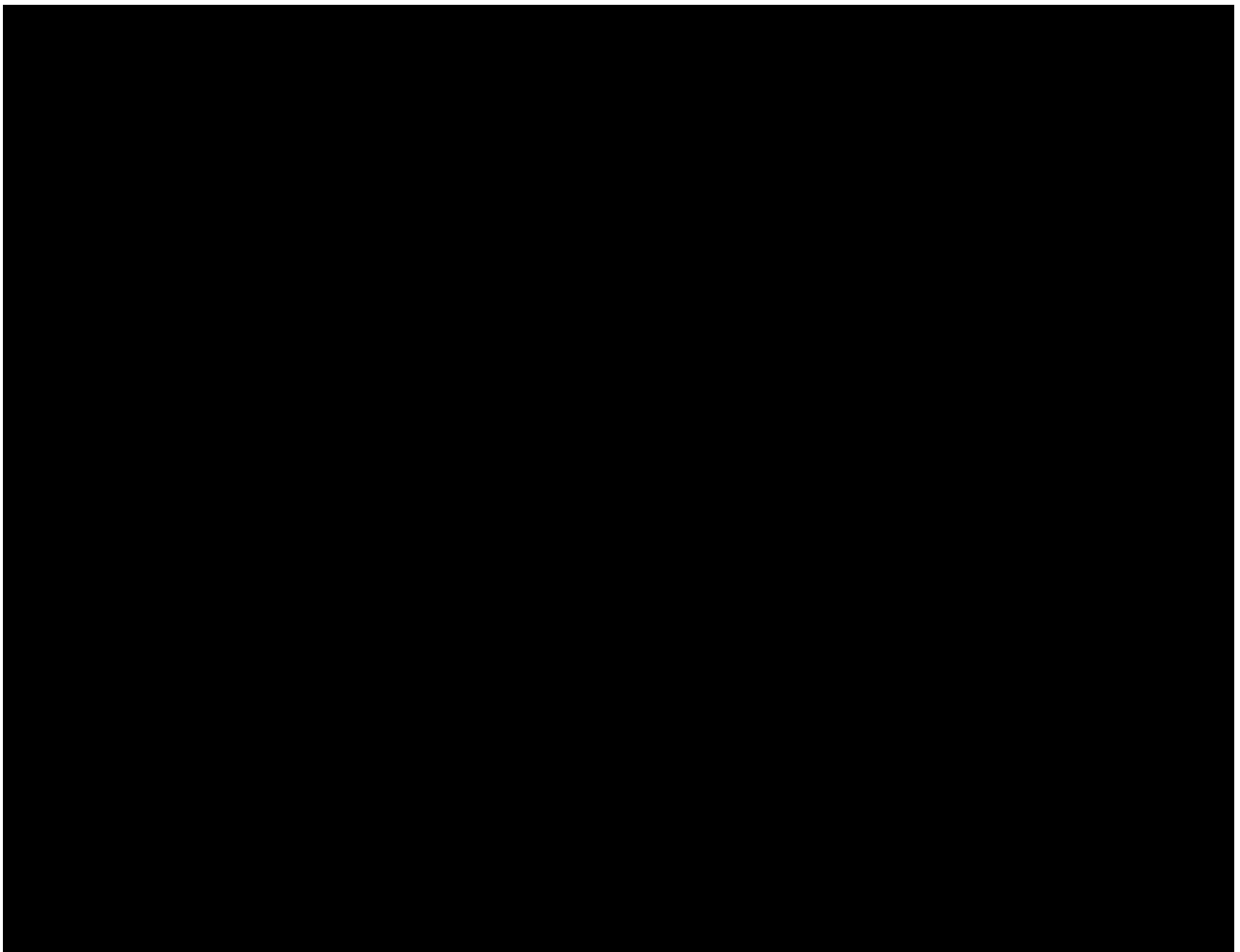
<b>Title of the report</b>	An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water
<b>Report type</b>	Natural England Evidence Review (NEER)
<b>Who are the target audiences of the report?</b>	Primarily peatland land managers, practitioners, academics, regulators and stakeholders with an interest in how peatland land management practices affect ecosystem services and natural capital.



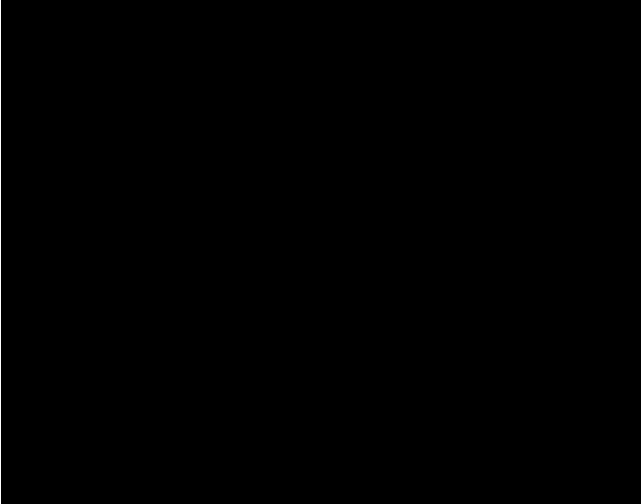
## Quality assurance

<p>Level of <a href="#">technical review</a> (e.g., Tier 3)</p>	<p>Tier 4</p>
<p>Technical Sign-off 1</p>	<p>[REDACTED]</p> <p>Principal Specialist – Synthesis, Chief Scientist Directorate, Knowledge into Practice Unit Natural England</p>
<p>Technical Sign-off 2</p>	<p>Prof. [REDACTED]</p> <p>Dr. [REDACTED]</p> <p>Prof. [REDACTED]</p> <p>Prof. [REDACTED]</p> <p>[REDACTED]</p> <p>Dr. [REDACTED]</p>
<p>Has the methodology been reviewed to ensure it meets evidence review standards (applicable to <a href="#">Natural England Evidence Reviews</a> only)?</p>	<p>Reviewed by [REDACTED]</p>
<p>Does the report meet <a href="#">Natural England Publishing Standards</a> and have accessibility guidelines been followed?</p>	<p>Y</p> <p>[REDACTED]</p>
<p>[REDACTED]</p>	





## Publication date

<b>Preferred date of publication</b>	14/01/2025 <b>07/03/2025</b>
<b>Please specify why you have chosen the preferred publication date (e.g., to align with an event, site of special scientific interest (SSSI) notification, etc.) and what flexibility you have.</b>	

## Sign-off

To be completed once the form has been reviewed and submitted.

<b>Senior Adviser - Publications</b>	
<b>CSD Comms</b>	

Best wishes,

[REDACTED]

-----  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]@naturalengland.org.uk>

**Sent:** Thursday, November 7, 2024 10:01 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: NE burning evidence review update

Hi [REDACTED]

With apologies for the further delay, attached is a relatively near complete but not yet edited, so still quite a 'drafty' version of the upland peatland burning evidence review update report.

There are a few sections that still need reviewing internally and in places completing, especially the appendices, and the whole report is still undergoing an edit, proof-read and further consideration of comments. The 'evidence statements' in Section 13 Summary and conclusions have only just been drafted (and are still to be done for vegetation and wildfire) so will be further reviewed.

As I previous mentioned, we are not expecting further detailed comments at this stage. Rather we wanted to give you the opportunity to see a more complete version and to make any more major comments you may have.

There is pressure to complete the report as soon as possible, so I'm sorry to say that we will need any comments by the middle of next week (of 11 November) if we are to be able to take them into account before it goes into our internal publication process/review. Apologies if this short timescale doesn't give you time to comment further, but no problem if this is the case. Nevertheless, if there are any major thing(s) of concern after next week then please still let me know anyway.

I've copied [REDACTED] in on this as some time ago she asked my colleague, [REDACTED], about the review and he suggested that I would send her a copy. Clearly it's still a draft but I'll send you both a copy when it's finalised.

# Annex I

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Fw: NE burning evidence review update  
**Date:** 04 December 2024 15:01:25  
**Attachments:** [Deshmukh et al Nature 2023.pdf](#)

---

Hi [REDACTED]

Sorry, I meant to forward these brief comments from [REDACTED] to you before.

I've tried to address his comments in the report apart from the last one on CO2 uptake by heather (above ground biomass) "may not be (probably isn't) indicative of peat C accumulation" (as in his cropped example paper) and wondered whether we might be able to add a brief sentence on it in the C section as it seems a good point to make.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, November 10, 2024 13:46  
**To:** [REDACTED]@naturalengland.org.uk>  
**Subject:** RE: NE burning evidence review update

Hi [REDACTED]

Thanks for sharing this. It's looking quite tidy now, and impressively comprehensive (to the extent that there are studies out there to work with). I won't pretend to have read it end to end but what I read looked good. A few very minor things:

- Could you amend my affiliation to [REDACTED]
- In 4.12, 'liked' should be 'linked'
- In 6.27, I think it would be more accurate to say "This was hypothesised to be a result of dilution by ash and therefore does not *necessarily* indicate a change in overall carbon stock"

Finally, I'm not sure if there are any studies that would allow a reliable calculation to be made but it's maybe worth emphasising that an ecosystem in which the biomass is removed periodically (via burning or harvesting) will look like a carbon sink for the period when the vegetation is regrowing, whereas over the full rotation it is a source. We see this in arable soils over a growing season, but the attached Acacia plantation example might be the closest analogue to a grouse moor – see the blue line in Extended Fig 1. We had to spend a couple of years explaining to the plantation managers that even though their flux tower was measuring CO2 uptake, that didn't mean that the peat was sequestering carbon. Once the trees got cut down and went into the paper mill they got it. I don't think you'd suggested anything that's inconsistent with this, but it's maybe worth emphasising that elevated CO2 uptake by heather a few years after a burn may not be (probably isn't) indicative of peat C accumulation.

Cheers,



# Annex J

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** FW: Updated Evidence Review on the effects of managed burning upon peatland biodiversity, carbon and water NEER004 <https://publications.naturalengland.org.uk/publication/5978072>  
**Date:** 14 March 2024 14:42:13  
**Attachments:** [~WRD0000.jpg](#)  
[image001.jpg](#)  
[image002.jpg](#)  
[Burning ER draft Dec 2023 \[REDACTED\].docx](#)

---

More comments in. Have rattled [REDACTED] cage as well. Hopefully [REDACTED] will get his comments in tomorrow.

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, March 14, 2024 2:26 PM  
**To:** [REDACTED]@naturalengland.org.uk>  
**Subject:** Re: Updated Evidence Review on the effects of managed burning upon peatland biodiversity, carbon and water NEER004  
<https://publications.naturalengland.org.uk/publication/5978072>

Hi [REDACTED]

I apologise for my delay in getting back to you with the review - this semester has been one I wish not to repeat. I attach a version with some comments (to be honest, there are not many as I do think you've done a very good job pulling it all together).

In short, I think it's incredibly comprehensive which should be applauded, but in a way, this might be it's downfall in some places as it is quite difficult to interpret/follow. Evidence is presented from studies as simply 'this study looked at X' and sometimes its shown as 'this study looked at X and found Y and Z'.

The coding system you have used for evidence does it make it hard to read paragraphs in places. I was wondering who the intended audience of a report like this is? I fear the stylised 'EV++' etc after every reference is very hard to follow (I'll admit I stopped looking at it eventually as my brain couldn't keep track).

I also had a question around the methodology/criteria and what was included. The report states that wildfire is excluded, but there are some papers from wildfire studies used? I think there needs to be some clarity around this.

As you mentioned previously, the full draft has not been completed, so again, it's hard to give a complete overview, but I'm hoping my comments are useful. I would be happy to look over it again in future if that is helpful.

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** [REDACTED] <[\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk)>

**Sent:** Wednesday, March 6, 2024 10:27 AM

**To:** [REDACTED]

**Subject:** RE: Updated Evidence Review on the effects of managed burning upon peatland biodiversity, carbon and water NEER004

<https://publications.naturalengland.org.uk/publication/5978072>

Phew!

---

**From:** [REDACTED]

**Sent:** Wednesday, March 6, 2024 10:14 AM

**To:** [REDACTED] <[\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk)>

**Subject:** Re: Updated Evidence Review on the effects of managed burning upon peatland biodiversity, carbon and water NEER004

<https://publications.naturalengland.org.uk/publication/5978072>

You don't often get email from [REDACTED] [Learn why this is important](#)

The PO has come through now.

[REDACTED]

-----

[REDACTED]

# Annex K

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Updated Evidence Review on the effects of managed burning upon peatland biodiversity, carbon and water NEER004 <https://publications.naturalengland.org.uk/publication/5978072>  
**Date:** 07 April 2024 14:50:13  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[Review \[REDACTED\].An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water.docx](#)

---

---

**From:** [REDACTED]  
**Sent:** Friday, April 5, 2024 3:58 PM  
**To:** [REDACTED]@naturalengland.org.uk>  
**Subject:** RE: Updated Evidence Review on the effects of managed burning upon peatland biodiversity, carbon and water NEER004  
<https://publications.naturalengland.org.uk/publication/5978072>

Hi [REDACTED]  
So so sorry for the delay here. Along with you a range of different things that have been competing for my time recently. Attached are my comments on the work. I hope these are useful to you all. Great work pulling this all together.  
Any questions at all then do please let me know.

[REDACTED]

---

**From:** [REDACTED]@naturalengland.org.uk>  
**Sent:** Tuesday, March 5, 2024 1:14 PM  
**To:** [REDACTED]  
**Subject:** Updated Evidence Review on the effects of managed burning upon peatland biodiversity, carbon and water NEER004  
<https://publications.naturalengland.org.uk/publication/5978072>

**CAUTION:** This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear [REDACTED]

Hopefully you will have received the [Purchase Order relating to your review of the updated evidence review on the impacts of burning on peatlands](#), if not, it should arrive in the next few days.

There have been many competing work areas which is why we have not yet been able to send through the remaining parts of the report: Introduction, Methods, Conclusions and Appendices. It is still our intention to do this as soon as possible. In the meantime, it would be extremely helpful if you could send through your comments on the main text as soon as you are able. You will still have the opportunity to see the report as a whole when it is completed.

It would also be helpful to know when you could send through your comments on the main text. I am attaching the main text that was sent previously.

Thanks very much for your support with this work.

Best wishes,

[Redacted]

[Redacted]

Principal Specialist Farmland and Nature Recovery  
Habitats Team, Chief Scientist's Directorate, Floor 5, Quay House, 2 East Station Road, Fletton  
Quays, PE2 8YY. [Redacted]

<http://www.gov.uk/natural-england>



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## The Moorland Association

Marian Spain  
Chief Executive  
Natural England  
Foss House  
Kings Pool  
1-2 Peasholme Green  
York YO1 7PX

Paul Kissack  
Defra  
Seacole Building  
2 Marsham Street  
London SW1P 4DF

10 April 2026

Dear Marian Spain and Paul Kissack,

**Subject: Follow-up to our letter of 18 February 2026 concerning NEER155 and the evidential basis for public assurances of “rigorous peer review”**

We write further to our letter of 18 February 2026 concerning Natural England Evidence Review NEER155 and the basis on which it has been publicly described as having undergone “rigorous peer review”. This follow-up does not restate the full case set out in that letter, which remains live. It addresses material additional points arising from Natural England’s internal review response dated 9 April 2026 in relation to EIR2026/00223 / IR2025/01669. In our view, those additional points materially worsen the original assurance problem and require clarification from both Natural England and Defra. For ease of reference, we attach Natural England’s internal review response dated 9 April 2026, on which this follow-up letter relies.

**New points arising from the 9 April internal review**

First, Natural England now states that the two senior officers involved in the 2024 peer review process have left the organisation, and that access to their historic emails, including emails showing which drafts were subject to peer review, is “no longer available” and is therefore treated as not held. It also states that the correspondence previously disclosed consists only of material specifically archived or copied to others.

Second, Natural England now says that, because those officers have left, it is unable to confirm which drafts were circulated to each person or provide a complete email trail indicating expectations, acceptance, resolution and closure from each of the peer-reviewers. That is a significant new admission. The issue is no longer simply whether the retained record looked sparse. Natural England is now expressly saying that it cannot evidence the full review trail.

Third, the internal review introduces a new reliance on Regulation 12(4)(d) in respect of unfinished documents and draft versions, including tracked-change and annotated draft versions of NEER155. It

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states that some external reviewers provided comments in that form, but that these materials are now being withheld as material in the course of completion. Annex A further states that these draft versions were “archived as unfinished versions” and that there was “no intention to complete them.”

In addition, those tracked-change and annotated drafts may have substantial evidential value in showing what external comments were made, how those comments were considered and addressed, and whether the public assurance of “rigorous peer review” can in fact be substantiated on the retained record. Given that NEER155 is complete, published and being relied upon in live policy and regulatory contexts, we ask Natural England to explain expressly whether that evidential value was taken into account before reliance was placed on Regulation 12(4)(d), and if so on what basis it was nonetheless concluded that withholding remained justified.

### **Why these new admissions matter**

These three new admissions matter because they sharpen the central issue identified in our 18 February letter. That earlier letter pointed to an apparent mismatch between the public assurance of “rigorous peer review” and the absence of the usual documentary artefacts such as a brief, scope definition, structured response record, and formal completion/sign-off record. The internal review now goes further: it suggests that some relevant records once existed or may have existed, but are either no longer available, cannot now be fully reconstructed, or are being withheld under a different exception.

That matters because NEER155 is not an abstract academic exercise: it is being relied upon in decisions that affect land managers, agri-environment arrangements, regulatory expectations and the day-to-day management of upland businesses.

In our view, that materially changes the question. The issue is no longer simply whether the original disclosure appeared incomplete, but whether the public assurance of “rigorous peer review” can still properly and responsibly be maintained on the retained record. That is particularly so because Natural England now says the historic email record of the two officers who oversaw the process is no longer available, that it cannot provide a complete reviewer trail, and that further review artefacts exist in tracked-change and annotated form but are being withheld.

### **Reliance on “unnecessary external pressures”**

We are also concerned by Natural England’s reliance, in Annex A, on the “potential for unnecessary external pressures” as a factor favouring withholding. Public, scientific, stakeholder, Parliamentary and legal scrutiny are ordinary and legitimate consequences of transparency, particularly where an evidence review is being relied upon in regulatory and ministerial contexts. If Natural England says there is some more specific harm than ordinary external scrutiny, it should identify it precisely. A vague concern about outside criticism or pressure is not, in itself, a proper basis for resisting scrutiny of the review trail.

In those circumstances, this is not simply a records issue but an accountability issue bearing directly on the legitimacy of continued reliance on NEER155 as having undergone “rigorous peer review”.

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### Points requiring response

Against that background, we should be grateful if Natural England and Defra would address the following limited points.

#### **1. Can the public description “rigorous peer review” still be maintained?**

Please confirm whether, in light of the 9 April 2026 internal review response, Natural England and Defra continue to consider that the description “rigorous peer review” is substantiated on the retained record. If so, please identify the retained records that now substantiate that description. If not, please explain what corrective action will be taken, by whom, and on what timescale, including in relation to prior and future public, ministerial, Parliamentary, regulatory or legal descriptions of NEER I55.

#### **2. Records now said to be unavailable**

Please explain the basis on which the historic emails of the two senior officers became “no longer available”, including whether those records once contained information in scope, what retention, deletion or access rules apply, when access ceased, and whether archived copies, backups, restored mailboxes, journal records or administrator access options were considered. Please also confirm whether Natural England’s position is that these records were (a) never created, (b) created but not retained, (c) retained and subsequently deleted, (d) remain extant but inaccessible, or (e) were transferred to another system or custodian and are no longer accessible through ordinary mailbox access.

#### **3. The new reliance on Regulation 12(4)(d)**

Please explain how archived tracked-change and annotated drafts of a completed and published report can properly be characterised as material in the course of completion, particularly where Natural England says there was no intention to complete those versions. Please also confirm whether those materials evidence the external comments made and how those comments were considered and addressed. Lastly, whether that evidential value was taken into account before reliance was placed on Regulation 12(4)(d).

#### **4. “Unnecessary external pressures”**

Please identify the specific harm Natural England says is captured by the phrase “potential for unnecessary external pressures”. Public, scientific, stakeholder and Parliamentary scrutiny are ordinary and legitimate consequences of transparency, particularly where a completed and published evidence review is being relied upon in ministerial, Parliamentary, regulatory and legal contexts. They are not, without more, a sufficient basis for resisting scrutiny of the review trail. If Natural England contends that disclosure would cause some more specific harm than ordinary external scrutiny, criticism or controversy, please identify that harm precisely and explain why it is said to outweigh the public interest in transparency.

#### **5. Consequences for public assurance**

Please confirm whether Defra continues to rely on the description “rigorous peer review” in relation to NEER I55 in ministerial, Parliamentary, regulatory or legal contexts. If so, please identify the documentary basis on which Defra considers that description substantiated. If not, please explain what corrective action Defra will take, by whom, and on what timescale.

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As before, we are not suggesting that no external expert input occurred. The narrower issue is whether the stronger public assurance attached to NEER155 can still properly and responsibly be maintained given Natural England's new admissions in its internal review response.

Those affected by decisions informed by NEER155 are entitled to know whether the assurance repeatedly attached to it can in fact be evidenced.

For the avoidance of doubt, nothing in this follow-up withdraws, narrows or supersedes the concerns and requests set out in our letter of 18 February 2026. Those points remain live, and we should therefore be grateful for a substantive response addressing both the outstanding points in our letter of 18 February 2026 and the additional points set out above.

We would be grateful for a substantive written response within 20 working days.

Yours sincerely,

**Andrew Gilruth**

Chief Executive

Moorland Association

[agilruth@moorlandassociation.org](mailto:agilruth@moorlandassociation.org)

**Cc:**

- 1) Mary Creagh CBE MP, Parliamentary Under-Secretary of State (Minister for Nature), Department for Environment, Food and Rural Affairs.
- 2) Professor Anjali Goswami, Chief Scientific Adviser, Department for Environment, Food and Rural Affairs.

**Attachments:**

- 1) Natural England Internal Review, 9 April 2026.
- 2) Moorland Association letter to Defra and Natural England, 18 February 2026.

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Date: 27 April 2026

Our Ref: BC2026/02086

Andrew Gilruth

By email only: [agilruth@moorlandassociation.org](mailto:agilruth@moorlandassociation.org)



Foss House  
Kings Pool 1–2  
Peasholme  
Green  
York  
YO1 7PX

Dear Andrew Gilruth,

This letter responds to:

- 1) your letter dated 18 February 2026 requesting clarification regarding the expert review process for NEER155"; and
- 2) your letter dated 10 April 2026 which asks additional questions following an internal review of an access to information request.

From the outset, I am clear that the contents of your letters do not alter our position that the evidence review and its assurance process were carried out according to good practice. Your suggestion that there is a need for corrective action is rejected and we will not be commenting further on either the review process for NEER155, the response to EIR2026/00223 / IR2025/01669 or the internal review of the related response to that request.

### **18 February 2026 Letter**

NEER155 is an updated evidence review on the effects of managed burning on upland peatland biodiversity, carbon and water. It builds on the 2013 review (NEER004) and follows the methodology set out by Stone (2013), which includes the recruitment of independent expert reviewers with internationally recognised peatland-specific expertise in ecology, carbon cycling, ecohydrology, biogeochemistry and wildfires. These reviewers provided comments on how the review identified, evaluated and interpreted the relevant evidence which was considered by Natural England in preparing the final draft of NEER155.

In addition to external review, the report underwent internal scrutiny by Natural England staff with expertise in evidence synthesis, wetland ecology, peatlands, peatland carbon and climate science, grazing, ornithology and invertebrates. Technical proof-reading, publication checks and accessibility review were completed, and the report went through our strategic sign off process.

Taken together, the 2013 review and the 2025 update provides a substantial body of evidence from which to draw conclusions about the impacts of managed burning and to inform practice and policy.

The combination of a recognised methodology, external expert scrutiny, internal technical review and formal governance sign-off provides assurance for the quality of the review and its findings.

**10 April 2026 Letter**

Natural England does not normally respond to decision letters in respect of access to information internal reviews.

In terms of reliance on Regulation 12(4)(d) EIR, the original request EIR2026/0223 did not ask for draft versions of the NEER155 report, nor did it ask for the actual peer review comments. Your second internal review email included a new information request. The purpose of internal reviews is to consider the original request and response, however we applied 12(4)(d) to then cover the additional information you had requested.

Yours sincerely,

A handwritten signature in blue ink that reads "Marian Spain".

Marian Spain

Chief Executive

Natural England

[marian.spain@naturalengland.org.uk](mailto:marian.spain@naturalengland.org.uk)



Department  
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Food & Rural Affairs

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[www.gov.uk/defra](http://www.gov.uk/defra)

27/04/2026

By email only: [agilruth@moorlandassociation.org](mailto:agilruth@moorlandassociation.org)

**From Paul Kissack**  
Permanent Secretary

RE: NE/DEFRA letter about NEER155 and EIR2026/00223 / EIR2025/01669

Dear Andrew Gilruth,

Thank you for your letter of 18 February regarding Natural England's evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water; NEER155 and for your subsequent letter of 10 April, concerning Natural England's internal review response dated 9 April 2026 in relation to EIR2026/00223 / EIR2025/01669.

In response to your letter of 18 February:

NEER155 was produced using Natural England's established evidence-review methodology and informed by an External Expert Review Group comprising leading independent specialists in peatland ecology, carbon cycling, ecohydrology, biogeochemistry and wildfire science. Their expert input shaped revisions to the report.

The review also underwent extensive internal technical scrutiny, followed by Natural England's full publication and governance checks, including Director-level sign-off. This combined assurance—external expert review, internal technical review and formal approval—meets Natural England's rigorous quality-control standards.

NEER155 represents a robust assessment of the best available evidence, drawing on a comprehensive literature search and building on the 2013 review. Taken together, the methodology, independent expertise and governance provide a sound basis for confidence in the quality and reliability of the review.

In response to your letter of 10 April:

Defra acknowledges receipt of your letter of 10 April and will not be entering into further correspondence about NEER155. Matters relating to EIR2026/00223 / EIR2025/01669 are for Natural England, and they will respond separately to your detailed information requests.

A handwritten signature in black ink, appearing to read 'P. Kissack', with a horizontal line underneath.

**PAUL KISSACK**  
**Permanent Secretary**



## The Moorland Association

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Seacole Building  
2 Marsham Street  
London SW1P 4DF

6 May 2026

Dear Ms Spain and Mr Kissack,

**Subject: NEER155: unresolved questions on “rigorous peer review”**

Thank you for your letters of 27 April 2026. We are disappointed that neither response substantively addresses the central issue raised in our correspondence.

**Unresolved issue: the retained audit trail**

The issue was not whether Natural England received comments from external experts, nor whether Natural England remains confident in NEER155. The issue was whether the public assurance that Natural England’s 2025 review of managed burning on upland peatland (NEER155) underwent “rigorous peer review” can be substantiated by a retained, auditable record showing what reviewers were asked to do, which versions or materials they reviewed, how their comments were assessed and addressed, how independence and conflicts were managed, and when the external review stage was completed and signed off.

This matters because the description of NEER155 as having undergone “rigorous peer review” has been used by ministers in Parliamentary and policy contexts, and is therefore a public assurance that must be capable of being substantiated by the retained record.

Your responses do not identify those records. Instead, they restate Natural England’s confidence in the review and refer generally to external expert input, internal scrutiny and governance sign-off. That does not answer the concern. External expert comment may support describing NEER155 as externally reviewed. It does not, without the missing audit trail, substantiate the stronger public assurance of “rigorous peer review” in ministerial, Parliamentary, regulatory and legal contexts.

We therefore do not accept that the 27 April responses satisfactorily address the concerns raised. In particular, they do not answer our questions about reviewer scope, instructions, versions reviewed, response-to-review records, independence checks, methodology assurance, completion/sign-off, NEER001 compliance, or the documentary basis for ministerial assurances.

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Your letters therefore crystallise rather than resolve the issue: Defra and Natural England continue to rely on the phrase “rigorous peer review” while declining to identify the retained records that would substantiate it.

### **Underlying scoring material**

This concern is compounded by Natural England’s repeated refusal to release the underlying study-quality and validity scores for NEER155, notwithstanding their importance to understanding how evidence was appraised, weighted and synthesised. That matter is already with the Information Commissioner. The Moorland Association also reserves its position in relation to any further information-rights issues arising from the 27 April responses. In our view, the combination of a public assurance of “rigorous peer review” that remains unsubstantiated on the retained record and continued refusal to disclose the underlying scoring material creates a serious transparency issue for a document being relied upon in policy, Parliamentary, regulatory and legal contexts.

### **Relevance to EFRA’s wildfire inquiry**

This issue is now directly relevant to Parliament. The EFRA Committee has launched an inquiry into the growing threat of wildfires and is seeking evidence on how wildfire risks are mitigated through land management, monitoring, and the responsibilities and oversight of government agencies. NEER155 is part of the evidence base relied upon by Defra and Natural England in relation to controlled burning policy, including policy choices that affect fuel management, wildfire mitigation and upland land management.

These are practical concerns, not abstract process points: NEER155 is being relied upon in decisions that affect controlled burning, the practical management of upland vegetation, wildfire risk, stewardship arrangements and rural businesses.

The Moorland Association supports evidence-led policy, but evidence that is used to justify restrictions on land management must be open to proper scrutiny.

It is therefore important that the Committee, Ministers and Parliament understand whether public assurances about the review’s “rigorous peer review”, and the underlying scoring and appraisal material on which its conclusions rest, are substantiated and available for scrutiny. We consider this material relevant to the Committee’s assessment of how evidence is generated, assured and relied upon in wildfire-related land-management policy.

### **Next steps**

We note Natural England’s indication that it does not intend to comment further, and Defra’s indication that it will not enter into further correspondence. That is a matter for you. However, it does not close the substantive issue.

We remain willing to resolve this constructively if Defra or Natural England can identify the retained records on which the public assurance rests. The Moorland Association reserves its position and will now consider appropriate further steps, including raising the governance and public-assurance issues through Parliamentary and departmental accountability channels and pursuing any further information-rights issues as appropriate.

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We also intend to publish the correspondence in the interests of transparency and to submit the relevant correspondence bundle to the EFRA Committee's wildfire inquiry, together with a short explanation of why we do not consider the 27 April responses to answer the questions asked.

In the meantime, we ask that Defra and Natural England ensure that any future public, Parliamentary, regulatory or legal references to NEER155 accurately distinguish between "external expert input / external review" and a "rigorous peer review" process capable of being substantiated by the retained record. Please ensure that this distinction is reflected in any future ministerial briefings, Parliamentary answers, regulatory decisions or legal references to NEER155.

Yours sincerely,

**Andrew Gilruth**

Chief Executive

Moorland Association

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**Cc:**

- 1) Mary Creagh CBE MP, Parliamentary Under-Secretary of State (Minister for Nature), Department for Environment, Food and Rural Affairs.
- 2) Professor Anjali Goswami, Chief Scientific Adviser, Department for Environment, Food and Rural Affairs.
- 3) Clerk of the Environment, Food and Rural Affairs Committee.
- 4) Rt Hon Alistair Carmichael MP, Chair of the Environment, Food and Rural Affairs Committee.

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