



The Moorland Association

Marian Spain
Chief Executive
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1-2 Peasholme Green
York YO1 7PX

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

2 July 2026

Dear Ms Spain and Mr Kissack,

Subject: NEER155 - Natural England's evidence review on managed burning: continued use of "rigorous peer review"

Thank you for your letters of 1 July 2026, responding to my correspondence of 6 May 2026 concerning NEER155, Natural England's evidence review on the effects of managed burning on upland peatland biodiversity, carbon and water.

I note Natural England's continued confidence in the process followed to produce NEER155, and Defra's position that it does not intend to enter into further correspondence about the peer review of NEER155.

However, the 1 July responses do not answer the central issue raised in our correspondence. The Moorland Association did not ask simply whether Natural England had received external expert comments, nor whether Natural England remained confident in NEER155. The question was whether the public assurance that NEER155 underwent "rigorous peer review" can be substantiated by a retained, auditable record showing:

1. what reviewers were asked to do.
2. which versions or materials they reviewed.
3. how their comments were assessed and addressed.
4. how independence and conflicts were managed.
5. when the external review stage was completed and signed off.

Your responses do not identify those records. They restate the existence of external expert scrutiny, internal technical review and governance sign-off, but they do not provide the retained audit trail needed to substantiate the stronger public assurance of "rigorous peer review" in ministerial, Parliamentary, regulatory or legal contexts.

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For the avoidance of doubt, the Moorland Association does not suggest that no external expert input occurred. The narrower and important point is that external expert input or external review is not the same as a “rigorous peer review” process capable of being substantiated on the retained record.

We therefore maintain our position that the phrase “rigorous peer review” remains unsubstantiated on the records Natural England and Defra have identified to date. We ask that any future public, Parliamentary, regulatory or legal references to NEER155 distinguish accurately between external expert input or external review, and a rigorous peer-review process supported by a retained audit trail.

As indicated in our letter of 6 May, the Moorland Association will now place the relevant correspondence before the Environment, Food and Rural Affairs Committee and will consider any further Parliamentary, departmental or information-rights steps as appropriate.

Nothing in this letter should be taken as withdrawing, narrowing or superseding the concerns set out in our correspondence of 18 February, 10 April and 6 May 2026. The Moorland Association reserves its position in full.

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) Rt Hon Alistair Carmichael MP, Chair of the Environment, Food and Rural Affairs Committee.
- 4) Clerk of the Environment, Food and Rural Affairs Committee.

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