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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.”[1]

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[2][3]; 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 or 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

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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.

### 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)

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