



## The Moorland Association

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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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