

BIODIVERSITY

Background

The current rate of loss of land, freshwater and marine biodiversity is more rapid than at any time in human history¹. Globally, three-quarters of commercial fish stocks are fully or over-exploited, and deforestation for products including wood, palm oil and soya, threatens the habitat of 80% of the world's terrestrial species².

In 2010, the landmark The Economics of Ecosystems and Biodiversity report was published, estimating that an investment of £29 billion could secure a global network of protected areas whose services are worth more than £3.2 trillion annually³. A renewed political commitment has followed, and the Nagoya Biodiversity summit secured an agreement to form a network of protected areas comprising 17% of the world's land surface, and 10% of the oceans, by 2020⁴.

Materiality and strategy

The Co-operative exerts a significant impact on biodiversity via the products offered by the Food business, which contain raw materials sourced from across the world. As the UK's largest farmer, The Co-operative has a direct impact on the UK's biodiversity, and The Co-operative Financial Services recognises that, unless closely monitored, its provision of finance and investment may have a detrimental impact on biodiversity.

Biodiversity is identified within the new Ethical Operating Plan (page 13) as an environmental priority. The food business works, where possible, to established certification schemes, including Forest Stewardship Council (FSC) (wood), Marine Stewardship Council (MSC) (fish) and Roundtable on Sustainable Palm Oil (RSPO) (palm oil), and a Responsible Fish Sourcing Policy governs the purchase of fish. The Co-operative Farms works to Defra's Environmental Stewardship scheme.

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Targets 2010	Progress	Targets 2011
Indicator: MSC-certified fish species sold (Performance benchmark and recognition page 83)		
Ensure all own-brand fish products are labelled as 'responsibly sourced'.	✓ All own-brand fish products now carry a 'responsibly sourced' label (page 82).	EOP Maintain position as one of the UK's most responsible retailers of fish.
Ensure no own-brand products contain fish from the Marine Conservation Society's (MCS's) 'Fish to Avoid' list.	✓ No 'Fish to Avoid' products sold (page 82).	Ensure all own-brand canned tuna is 100% pole and line caught by 2011.
Indicator: FSC-certified timber products sold		
		EOP Aim to be the UK's leading retailer on forest protection, including maintaining leading work on wood and paper.
Achieve FSC certification for The Co-operative Food's greaseproof paper during 2010.	✗ Work is underway with suppliers, however, at present, supplies remain unavailable (page 83).	Achieve FSC certification for The Co-operative Food's greaseproof paper during 2011.
Pursue 'Graduate Status' for The Co-operative Food within the WWF-FTN in 2010.	✗ 'Graduate Status' not yet achieved; will continue to be pursued during 2011 (page 83).	Attain WWF-UK Forest and Trade Network 'Graduate Status'.
Ensure 90% or more of The Co-operative Travel's point-of-sale material remains FSC-certified during 2010.	✓ FSC certification achieved on more than 90% of point-of-sale material (page 84).	
Indicator: Use of palm oil in own-brand products		
Ensure palm oil used in all own-brand products is 100% certified sustainable palm oil (CSPO) by 2015.	= Target on track, and timeline brought forward (page 84).	EOP Palm oil used in all own-brand products to be 100% certified sustainable palm oil (CSPO) by end of 2011.
Complete the conversion of at least 15 own-brand products to CSPO during 2010.	✓ 268 products now made with CSPO (page 84).	

(continued over)

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🎯 Targets 2010	Progress	Targets 2011
Indicator: Use of soya in own-brand products		
		EOP Move soya sourcing to a sustainable footing by 2015.
Indicator: Biodiversity initiatives		
Progress wildflower seed trials on The Co-operative Farms' sites, as part of Plan Bee, during 2010.	✔ Over 850 hives established, and research is due to conclude in 2012 (page 86).	EOP Extend Plan Bee campaign and seek to address the decline of additional 'at risk' pollinators.
Raise, through the RSPB credit card, £400,000 for Britain's threatened wetlands during 2010.	✔ £398,000 raised (page 87).	

Marine stewardship



The Co-operative Food's Responsible Fish Sourcing Policy⁵ was launched in 2008, and governs the sourcing of all own-brand wild and farmed seafood. The Policy is underpinned by a checklist, which examines individual species based on the fishery location

and method of catch; species' resilience to fishing; fishery by-catch estimates; and whether species are noted as critically endangered or endangered on the IUCN Red List, as well as stock assessments from NGOs, such as Greenpeace. The full Responsible Fish Sourcing Policy is available online [▶](#).

🎯 All own-brand fish products have a 'responsibly sourced' label, and the number of MSC-certified fish products sold has increased from 18 to 28⁶ in 2010, representing 25% of the range.

🎯 The Co-operative sells no products identified by the Marine Conservation Society as 'Fish to Avoid', and also commits to the following sustainability initiatives:

- **Tuna** Own-brand tuna is caught by methods that conform to the Earth Island Institute (EII) dolphin-safe standards⁷. Drift nets are not used to catch tuna⁸, nor are fish caught using the method known as 'setting on dolphins'⁹.
- **Salmon and trout** Conventional and organic farmed fish (representing the majority of fresh salmon and trout) is produced to strict codes of practice. The Co-operative Food was an early promoter of humane stunning prior to slaughter for farmed fish; a standard that is now widely accepted across the industry.
- **Prawns** All warm-water prawns are sourced from well-established farms in Indonesia and Thailand, which are Global Aquaculture Alliance (GAA) certified. Farms in areas of mangrove forest depletion are not used.
- **Cod** Own-brand cod is sourced from well-managed Icelandic and Norwegian stocks that are either MSC-certified or currently undergoing MSC assessment.
- **Haddock** Own-brand Scottish haddock is sourced from well-managed MSC-certified fisheries, and all other Co-operative Food branded haddock is line caught from Icelandic or Norwegian stock that is MSC-certified or currently undergoing MSC assessment¹⁰.

▶ Support for UK fisheries

In 2008, £200,000 was made available to fund the certification of UK fisheries to the MSC standard. Twelve projects are currently underway: one fishery is currently undergoing MSC pre-assessment, the Sussex

inshore fishery (including 26 separate fisheries) has completed its pre-assessment, nine fisheries are currently undergoing full MSC assessment and the North Menai Strait Mussel has gained MSC accreditation.

"By funding fisheries like Bangor Mussel Producers through assessments, The Co-operative is taking direct responsibility for ensuring that fisheries are certified as sustainable, and making a significant difference towards changing the global seafood market to a sustainable basis."

Toby Middleton, Marine Stewardship Council



MSC certification 2010

28 MSC-certified fish products sold
2009: **18**

Performance benchmark

The Co-operative Food was ranked first out of eight retailers in the Marine Conservation Society (MCS) 2009 supermarket survey. The Co-operative was praised for eliminating all fish from MCS's list of 'Fish to Avoid' from its shelves; for selling the largest volume of seafood from the 'Fish to Eat' list; for its campaigning work to bring about marine reserves; and its financial support to enable UK fisheries to become more sustainable.

Performance benchmark

In early 2011, The Co-operative Food was ranked fourth of nine retailers in the Greenpeace Tuna League Table. The Co-operative was praised for only stocking those tuna species more resilient to fishing and for its public advocacy work with the MCS. Although The Co-operative has a strong commitment to sourcing only pole and line caught tinned tuna by the end of 2011, at the time of the survey, some own-brand tuna was sourced from fisheries utilising fish aggregating devices and purse seine nets, a combination which is associated with increased levels of by-catch.

Performance recognition

In early 2010, The Co-operative Food was named as a 'Seafood Champion' by the Seafood Choices Alliance, a US-based organisation that campaigns to improve the sustainability of the global seafood sector. The award provides international recognition for outstanding leadership in promoting environmentally responsible seafood.

Forest stewardship



The mark of responsible forestry

The Co-operative Food

The Co-operative supports Forest Stewardship Council® (FSC®) certification, the most respected independent standard for the certification of forest products. During 2010, 37,800m³ of wood and paper products (2009: 30,800m³) were purchased. All were of known origin, with credible evidence of legal harvesting, and 94% (2009: 93%) were supported by FSC certification, demonstrating a complete chain of custody from forests that demonstrate social, economic and environmental benefits¹¹. A further 2% (2009: 6%) were sourced from recycled post-consumer waste, 3% (2009: 0%) were from recycled pre-consumer waste, and 1% (2009: 0%) were from known, legal-source virgin material, such as that certified by the Programme for Endorsement of Forest Certification Scheme (PEFC).

Total percentage of own-brand Co-operative Food products supported by FSC certification

2006	2007	2008	2009	2010
36%	67%	96%	93%	94%

FSC certification 2010

94% of Co-operative Food wood and paper products FSC-certified, with a further 5% from recycled waste
2009: **93%**

FSC products sold include: barbecue charcoal, wooden kitchenware, bagged growing media, and household paper. Cork used in own-brand corked wines is currently being converted to FSC-certified cork, and five own-brand wines have been converted to date.

🔍 Greaseproof paper is currently PEFC-certified, and, working with suppliers, the product will be moved to FSC certification as soon as supplies are available.

As a member of the WWF-UK Forest and Trade Network (FTN), The Co-operative Food commits to tracing all timber and paper products back to forest sources and to improve forest sustainability in conjunction with suppliers. 🔍 During 2011, The Co-operative Food will continue to pursue Graduate Status within the FTN, which confirms and recognises the achievements of members whose trade by volume in forest products is consistently more than 95% credibly certified and/or recycled post-consumer material.



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CFS, The Co-operative Funeralcare and The Co-operative Travel

FSC-certified timber, or high recycled content MDF, was specified for the refurbishment of six bank branches and eight regional sales offices in 2010. Of the 92,000 coffins and caskets manufactured by The Co-operative Funeralcare, 45% (2009: 44%) were FSC-certified foil on chipboard, and the veneer coffin ranges, representing 48% of output, were converted to FSC in early 2011. The remaining 6% (2009: 7%) of coffins manufactured were from solid wood¹². During 2010, more than 90% (2009: 50%) of The Co-operative Travel's printed point-of-sale material was FSC-certified.

Palm oil

Palm oil is used as an ingredient in a wide variety of food and non-food products. As demand for palm oil increases, biodiversity loss from land-use conversions can be dramatic; palm oil plantations are now the leading cause of rainforest destruction in Malaysia and Indonesia¹³.

In order to tackle the deforestation associated with palm oil, the Roundtable on Sustainable Palm Oil (RSPO) was formed in 2004 to promote the growth and use of sustainable oil palm products through credible global standards and engagement of stakeholders. One barrier to the wide-scale uptake of RSPO-certified oil is the complexity of the commodity supply chain. In order to overcome this, The Co-operative Food has, since 2009, been a member of GreenPalm, an RSPO-endorsed platform, which negates the problem of segregation of sustainable and unsustainable oil by allowing the end user to purchase certificates directly from the producer to cover usage in products. These certificates can then be redeemed to show how a business is promoting the production of RSPO-verified sustainable palm oil.

During 2010, accounting systems were improved to determine the volumes and origins of palm oil used in The Co-operative Food's own-brand products¹⁴. In total, 5,090 tonnes of palm oil were used within 624 own-brand products, of which 2,343 (46%) were Certified Sustainable Palm Oil (CSPO), under one of the certification schemes developed by the RSPO¹⁵. A total of 268 own-brand products now use exclusively CSPO, considerably exceeding the target of 15 products set the previous year. The Co-operative Food has set the new target of ensuring its palm oil requirements for all own-brand products are fully covered by either CSPO or a certificated equivalent such as GreenPalm by the end of 2011. Additionally, it is intended that identity preserved CSPO will be utilised for all own-brand requirements by 2015.

Certified palm oil 2010

268 own-brand products made exclusively with certified sustainable palm oil

Soya

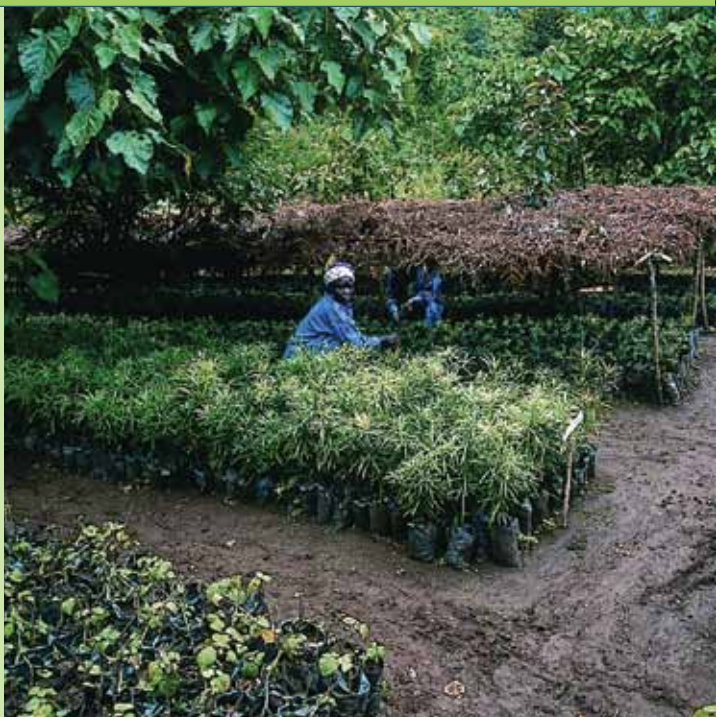
As a high-protein, low-fat and low-cost bean, soya is a versatile and prevalent ingredient in many foods, however the vast majority of the global soybean crop is used as a foodstuff for livestock and poultry¹⁶. In 2009, nearly half of all soya originated in South America¹⁷ and its production has been linked with deforestation of the Amazon and destruction of other ecosystems¹⁸.

Carbon offset, reforestation and forest protection

In 2010, reforestation, again, accounted for 20% of The Co-operative's carbon offset programme (page 67), and will continue to do so, given this is the commonly accepted level of CO₂ emissions attributable to deforestation and land use change. During the year £173,500 (2009: £251,000) supported reforestation in Kibale Forest National Park, Uganda and £187,000 supported a Reducing Emissions from Deforestation and Degradation (REDD) project in Kasigau, Kenya.

In Kibale, the areas planted on behalf of The Co-operative have attracted primates, including chimpanzees, and

forest elephants, and the programme provides seasonal work for up to 400 people. Further details of work with villagers living near Kibale are given on page 29. The Kasigau Corridor project in Kenya provides education and employment to local communities in areas such as conservation and sustainable charcoal production, creating an economic alternative to forest clearing for agriculture. The area protected is also a wildlife corridor between two national parks, supporting many species including lion, cheetah, African elephants and the endangered Grevy's Zebra.



Due to the wide breadth of soya use across the food chain, the development and maintenance of accounting systems to gauge and monitor soya use in own-brand products is challenging. However, in 2011, The Co-operative Food will develop accounting systems to measure soya use within the Elmwood product feed chain (higher-welfare pork, chicken and turkey) and by 2015, soya in the feed chain of own-brand meat products will have a sustainable footing which avoids deforestation and other habitat destruction, providing adequate supplies of sustainable soya are available.

Peat

Peat is the major constituent of most horticultural growing media in the UK, however its removal from bogs in Britain threatens wildlife habitats and degrades carbon sinks. The Co-operative's long-term goal is to meet the Government's target to completely phase peat out of the amateur gardener market by 2020. To comply, annual dilution targets for peat have been established, and in 2011, all growing media sold will contain no more than 20% peat.

Of the 8,741m³ of peat-related products sold in 2010 (2009: 9,072m³), 68% was peat¹⁹ (2009: 36%). The substantial increase in the average peat content was predominantly due to the short-term removal from sale of low peat own-brand growing media (40% peat).

During 2010, plant baskets and tubs successfully used composted flower waste as growth media. The Co-operative was the first major retailer to stock peat-free salad cress, which, rather than being sold in peat-lined punnets, is grown on special matting made of 100% biodegradable material.

Moors for the Future

The blanket bog areas on the high moorland plateau of the Peak District contain some of the oldest peat deposits in the UK. They are internationally recognised, providing a home for populations of breeding birds, such as merlin and golden plover²⁰, and nationally rare and significant plant communities. Moors for the Future is Britain's largest upland conservation partnership project, implementing conservation, research and awareness-raising work in the Peak District. In spring 2009, The Co-operative Foundation (page 19) provided £78,290 to Moors for the Future for a project to develop a method for large-scale cultivation and spreading of Sphagnum

moss²¹. The loss of Sphagnum, predominantly due to historic pollution, over-grazing and fire damage, has been a major factor in the erosion of blanket peat in the South Pennines²². The final results of the project will be published in 2011, however initial results show that Sphagnum is suitable for large-scale reintroduction via aerial spraying, and survival rates are sufficiently high to enable re-colonisation.

"The work on the Sphagnum propagation project is probably the most important project to have been undertaken in restoring moorland. It would not have happened without The Co-operative Foundation."

Matthew Buckler, Moors for the Future

Land stewardship: The Co-operative Farms

In 2010, The Co-operative Farms managed a total of 17,541 hectares (2009: 20,726 hectares) of land on a variety of different agreements. Of this land, 11,133 hectares (2009: 10,699 hectares) were owned/tenanted by The Co-operative. Of land farmed as The Co-operative Farms, 10,674 hectares (2009:10,070 hectares) were intensively cultivated and 459 hectares (2009: 262 hectares) were either unintensively cultivated or left fallow.

All farms are assessed annually against an environmental management system (EMS), which checks for best practice and legislative compliance, and identifies areas for environmental improvement. In 2010, 93% (2009: 94%) of the eligible owned/tenanted and intensively farmed land was managed in accordance with the Natural England Environmental Stewardship Scheme 'Entry Level', and a 'Higher Level' Stewardship Scheme commenced on the Stoughton Estate²³. Farms are compliant with Good Agriculture and Environmental Condition standards and Statutory Management Requirements on soil, ensuring a base level of protection for soils, habitats and landscape features.

Hedges are only cut every second or third year, and are cut in late winter. A number of grass margins and field corners have been established and maintained, and in 2010 these accounted for over 250 hectares²⁴ (2009: 243 hectares) of intensively cultivated land. These measures provide improved nesting sites for birds and chicks, and offer habitats for insects and small mammals.

Habitat heroes

In 2010, a national wildlife initiative, 'Habitat heroes', was launched at six Co-operative farms across the UK. Adaptations are being made to farmland to improve habitats and support endangered or protected species. Barn owls are expected to benefit from a Barn Owl Manor built on The

Co-operative's Down Ampney Farm and others have already been seen investigating the purpose-built holt on The Co-operative's Coldham Farm. Red squirrels, water voles, bats (17 species) and pollinators such as bees, butterflies and hoverflies, are all expected to benefit.



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Plan Bee



In January 2009, The Co-operative launched Plan Bee to highlight the decline of the honeybee population. Plan Bee is centred on taking action on pesticides (page 89), the funding of research into the causes of the decline in bee numbers, and encouraging Co-operative members to take action in their own gardens. As announced as part of the new Ethical Operating Plan (page 13), Plan Bee will be extended to other 'at risk' pollinators in 2011.

 www.co-operative.coop/planbee



Key activities include:

- The distribution of wildflower seeds to Co-operative members and customers. Since the campaign launched in 2009, over 900,000 packets of wildflower seeds have been distributed. The flowers, once grown, will provide nutrition for bees, as well as other pollinators.
-  Research into the wildflowers best suited to honeybees, being progressed at The Co-operative Farms. Seed mixes have been trialled since 2009 and the research is expected to be concluded in 2012. Land managed by The Co-operative Farms now has over 850 (2009: 500) hives.



- Development of a Plan Bee trailer for The Co-operative Good with Food roadshow, which toured UK county and royal shows during 2010. The trailer raises awareness of the decline in bee numbers and provides practical advice on supporting bees in gardens. In total, the trailer was shown at shows attended by two million people.

- Urban bee-keeping training workshops held in Inverness, Sheffield, Mid Antrim, Manchester and London. By the end of 2011, approximately 300 new beekeepers will have attended these workshops.



- Research to map native bee populations which may be better adapted to the UK climate. This project was expanded to include the rearing of native queens in 2010.

- Support for 'Honey', the street theatre production, which was featured at 12 festivals in 2010, engaging with over 1,900 people.

- A promotion on selected wines in The Co-operative Food stores, with a supplier donation of 5p per bottle to the Plan Bee campaign, raising £45,000.



- Sponsorship, by The Co-operative Travel, of a bee conservation project in Quintana Roo, Mexico, funding the planting of 570 trees and shrubs suited to honeybees, and the construction of a water canal to protect hives from ant invasion. Early signs indicate that this project is having a positive impact, with honey yields showing an increase of 87% on previous figures.



The Plan Bee campaign won the Chartered Institute of Public Relations Excellence Award for Corporate Responsibility in 2010.

Ethical finance

Bank screening of finance

During 2010, 55 finance opportunities (2009: 76) were referred to the Ethical Policy Unit in connection with biodiversity, of which two were declined (2009: two) at a cost of £306,000 in terms of estimated income foregone in 2010.

Biodiversity-related business declines 2010

	Estimated income foregone 2010
Timber merchants (two instances) In the first instance, £9m lending was declined for a business engaged in actively sourcing teak hardwood from Burma, as well as sourcing uncertified timber, including vulnerable species from West Africa, Asia and South America. In the other, banking facilities were declined for a business sourcing uncertified timber, including endangered species from Asia and West Africa.	£306,000

The Co-operative Asset Management (TCAM) overseas shareholder resolutions

In 2010, TCAM was presented with six overseas shareholder resolutions relating to biodiversity, all of which were supported.

Company	Resolution	Vote registered
Nordea Bank	To avoid investment in companies supporting unsustainable forestry.	Supported
Weyerhaeuser Corp	To report on FSC certification.	Supported
Valero Energy Corp	To report on impact of operations on rainforest sustainability.	Supported
ConocoPhillips, Exxon Mobil Corp	To aid in restoration of Louisiana wetlands damaged by companies' past activities.	Supported
R R Donnelley & Sons	To develop a sustainable paper purchasing policy.	Supported

RSPB credit cards

Wetlands are an important and productive habitat, but are under threat from the demand for water, poor land management, agricultural drainage and housing development. Between 1999 and 2010, over £5.6m was raised for Britain's threatened wetlands via the Royal Society for the Protection of Birds (RSPB) credit cards (£398,000 during 2010). Monies raised by the card are used for the creation and management of wetlands in the UK.

Woodland Trust credit cards

The UK is the least wooded country in Europe, with just 12% woodland cover, compared with a European average of 44%. Monies raised through the Woodland Trust affinity card will help the Trust reverse this trend and support a range of woodland protection and creation

projects, such as the 'Tree for All' campaign. Tree for All aims to plant 12 million trees – one for every child in the UK. Since 2007, the Woodland Trust credit card has raised over £124,000 (£32,262 in 2010), enough to help the Woodland Trust plant over 15,000 trees.

Bonus Account

The bank offers a youth account in support of animal welfare and conservation. Since 2003, the Bonus Account, in partnership with the Born Free Foundation, has provided £206,183 (£49,826 in 2010) of support to projects such as anti-poaching units in Zimbabwe and Kenya, Cameroon chimpanzee sanctuaries, and conservation projects for sea turtles in Tanzania and tigers in India.

Influence and action

Illegal timber

In April 2010 TCAM wrote to the European Parliament's Environment Committee in support of its proposals to introduce legislation banning the import of illegally logged timber into the EU. In July 2010 the vote to introduce the proposed legislation was successfully passed.

Accompanying notes

- UNEP, 2010 Advancing the Biodiversity Agenda – A UN System-Wide Contribution.
- www.teebweb.org
- Ibid.
- Ibid.
- www.co-operative.coop/food/food-and-drink/food/Own-brand-fish
- A full list of products is available online
- The Earth Island Institute monitors this claim. www.earthisland.org
- Drift nets are kept at, or below, the surface of the sea by numerous floats, and drift with the current. They may be used close to the seabed (eg, shrimp drift net) or at the surface (eg, herring drift net), usually across the path of migrating fish schools. Fish strike the net and become entangled.
- The tuna/dolphin controversy centres on the Eastern Tropical Pacific fishery where, unusually, schools of large yellowfin tuna associate with dolphins. In a practice that began in the 1950s, purse seiners maximise their catches of yellowfin tuna by chasing and setting their nets on herds of dolphins. This practice has resulted in very high numbers of dolphin deaths.
- The Co-operative Food's sustainable fish sourcing policy requires cod to be line caught from specific areas, such as Iceland or Norway, where stocks are deemed to be acceptable and well managed.
- FSC certification includes FSC mixed-source certification, which requires a timber product to contain a minimum of 50% FSC-certified material and the remaining materials to be from controlled sources.
- The majority of which are made using American red oak.
- UNEP (2007) State of Emergency: Illegal logging, fire and palm oil in Indonesian national parks.
- The product composition document requests that, for all new products and re-labelling of existing products, suppliers consider other types of oils, ideally from non-tropical sources, before palm oil, in the formulation of a product, where it does not have an impact on flavour or functionality of the final product. Some products may be allowed to use palm oil to fry strictly on permission of the Technical Manager, although, in these cases, sustainable palm oil will be a requirement.
- The Co-operative uses three different routes for CSPO accreditation. These are: 'UTZ certification' (3.8% of total palm oil use), where oil is traced using the RSPO official traceability partner; 'Segregated' (7.6%) where palm oil can be 100% CSPO traced from plantation to product, allowing the claim that this product contains RSPO-certified palm oil; 'identity preserved' (less than 1%) where oil is uniquely identifiable to the mill and its supply base, and is kept physically isolated from all other palm oil sources throughout the supply chain (including other segregated RSPO-CSPO sources); and GreenPalm (34.6%), as described within the main text.
- FAO (2006) – Livestock's Long Shadow.
- soystats.com/2010/page_30.htm
- Such as the Cerrado, the Pantanal, and the Atlantic Forest.
- Includes bagged compost and compost for household and bedding plants.
- www.jncc.gov.uk/default.aspx?page=2001
- Sphagnum moss is the fundamental building block of the world's peatlands. It creates waterlogged anaerobic, acidic conditions that prevent micro-organisms from growing easily and breaking down dead vegetation. This allows plant remains to accumulate at a faster rate than they decompose, thus forming peat.
- The degradation of Sphagnum moss, as a result of 250 years of industrial pollution, has resulted in the erosion of blanket peat. The erosion of blanket peat leads to the drying out and exposure of peat.
- www.naturalengland.org.uk/ourwork/farming/funding/es/default.aspx
- This figure varied throughout 2010 as a result of land sales.

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