

Dr Adam Smith
Policy and Advisory Scotland
T: 01828-650543
E: asmith@gct.org.uk



Dear Minister

Muirburn Dates in Relation to Climate Change Adaptation

Despite a significant split in opinion seen in the recent consultation, we understand there remain suggestions that Scottish Ministers should receive the power to vary the permissible dates for muirburn as part of the provisions of the Scottish Climate Change Bill. It has been suggested that the principle areas this may help in are:

- By protecting carbon rich peat from damage if the climate becomes drier.
- By protecting ground nesting birds in the event their breeding become earlier.

However, we are seriously concerned that there is little evidence for a positive adaptive effect for these powers, while there is good evidence that restricting the season may be positively damaging. This is because our research suggests that:

- Shortening the muirburn season could increase the risk of inappropriate burning and decrease wildfire control options, thus promoting carbon loss.
- Shortening the muirburn season could lead to many moorland birds breeding less well as risks to breeding birds are naturally limited by the industry's self-interest.

Limiting muirburn dates could thus negatively affect climate adaptation in the future if the powers were not used wisely or without a solid evidence base. We recommend that the need for the powers to amend the season are considered as part of possible future legislation only after essential research has been conducted; such research should aim to create models which can accurately predict climatic, habitat and soil conditions which would pre-dispose towards damaging wildfire. We could then support an amendment to the Act which would allow temporary local suspension of burning rights for environmental protection.

There are also a number of other positive actions relating to muirburn that we would support that could help Scotland adapt to climate change. Ministers should be given powers to extend the muirburn season into September or powers to allow for license applications for muirburn season extensions. Consideration could be also given to a range of practical tools such as amending the Muirburn Code, supporting capital and fuel costs associated with the muirburn equipment which brings wildfire protection capability and the funding of work to establish reliable water supplies for firefighting activities on moorland and woodland areas.

We hope that these suggestions are useful to you in your deliberations.

With best regards,

Adam Smith
CC: Rural Affairs and Environment Committee

A handwritten signature in black ink, appearing to read "AASL".