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Proposed Scottish Climate Change Bill

Though patterns in our climate appear to be changing and the effects of climate change may in the future be felt throughout Scotland, research conducted to date on matters such as changes in bird breeding dates is equivocal. Likewise we are only at the beginning of research, particularly experimental research, into the role of land management and carbon storage and release. However most Scottish ecosystems have some potential to uptake and store carbon. As many ecosystems are maintained and modified for sporting management advising on protecting and enhancing their operation and management is something the Trust is well qualified to do.

The majority of the questions laid out in the consultation are not within the Trust's competence. However there are three questions to which we can respond for the public benefit:

Q 25/26: Should the Bill contain enabling powers to introduce statutory guidance for certain public sector bodies (i.e. local authorities and large public bodies) on specified climate change or other environmental measures? Why?

The uplands uptake and store a very large quantity of carbon as peat. Most peatlands are un-forested and these open peat habitats have been created by and are maintained by management of habitat through grazing and fire for sporting purposes, notably red grouse and deer, and sheep stocking. Though likely to bring beneficial responses for biodiversity in many areas, the Trust believes that the current Scottish Forestry Strategy could lead to a loss of carbon storage potential as a result of a general aim to increase Scotland's tree cover, notably onto current peatland areas. We would suggest that guidance is introduced such that Forestry Commission Scotland avoids disturbance to and loss of peat producing soils through tree regeneration and planting.

Q 30. Are there any provisions to help Scotland adapt to the impacts of climate change which should be included in the Scottish Climate Change Bill?

There are a number of issues which will be difficult to promote through direct legislation but which a Climate Change Bill could enable and support through incentive. Notably there are number of areas of research which are needed in order to inform best practice in the future. The Trust seeks support for research into the best practice activities of muirburn and grazing that will maintain and enhance carbon storage in moorland ecosystems and allow the species associated with these upland areas to adapt to climate change. We would urge support for research into wildfire risk scenarios, agreement on best practice managed fire regimes to reduce wildfire risk and the

development of enhanced public awareness strategies such as media based alerts with the aim of reducing uncontrolled fires that can seriously damage peat accumulating systems.

Provisions to support SRDP would have a useful role in helping Scotland adapt. In the lowlands trees can be significant carbon sinks and stores and the role here of sporting activities is significant; some studies suggest 80% of tree cover on land below 300m has been planted and managed for its sporting value. Support within the Bill for making the SRDP Options which encourage the best practice management of all carbon sinks such as muirburn, drain blocking, small scale woodland creation more accessible (many are currently Tier 3 options) would be a significant contribution to allowing Scotland to adapt to Climate Change.

Biofuels are an active area of research and debate. The Trust's research has shown that short rotation coppice can contribute, when done sensitively, to both carbon neutral fuel production and bringing the greatest net biodiversity gain of any row-crop. We suggest the Bill incorporate sensitive promotion of this land use for both carbon emission reduction and biodiversity benefit.

Q 33. Is there any existing legislation within the competence of the Scottish Parliament (devolved) which needs to be amended so that appropriate action on climate change can be taken by sectors in society?

The Hill Farming Act 1946 is the most relevant legislation to carbon protection in the uplands as it regulates muirburn. The process of understanding the relationship between fire and carbon storage is in its infancy but it is clear that very hot fires in very dry conditions can rarely lead to damage to peat soils and a loss of previously stored carbon. The conditions which such fires occur under are rare during well managed muirburn. But regulation of when burning is permissible in relation to preceding and prevailing weather conditions may be useful in order to prevent damaging wildfires. When suitable research has been conducted, which it is agreed is better than the management community at accurately predicting climatic, habitat and soil conditions which would pre-dispose towards damaging wildfire, we would support an amendment to the Act which would allow temporary local suspension of burning rights for environmental protection.

Sporting and agricultural land management already has a significant positive effect on Scotland's ecosystem services. With development and support, current best practice could be further enhanced with particular regard to factors which could influence our climate.

AAS
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