Written submission from League Against Cruel Sports

Our main concerns is that there is little contained in the draft Plan on the role of the shooting industry in reducing carbon emissions. There has been considerable public debate and concern around this issue.

Muirburn normally occurs on driven grouse moors, and its use is increasing. It is done to provide green shoots for the grouse to eat, and to provide areas where grouse can hide from predators.

There is little evidence that it helps to control wildfires and there are examples of out of control muirburn requiring intervention from the fire brigade.

Muirburn itself directly releases carbon into the atmosphere. It also exposes peat. Although the effects vary over types of soil and intensity of burning, muirburn can also greatly hamper carbon sequestration on moorland.

Concerns have been raised by other agencies and academics on the effects of muirburn, including in publications by SNH, the EMBER study by the University of Leeds, the Committee for Climate Change and others. A report by Andy Wightman and Ruth Tingay which gives more detail and a bibliography, is attached.

Currently, the lack of regulation of the shooting industry makes it impossible to accurately determine how much land is affected by muirburn, although we know that large swathes of the country, particularly in North East Scotland, are run as shooting estates.

Although we are pleased the Government is examining peat moorlands as part of the Climate Change plan, there should be more work done on muirburn, rather than concentrating on giving grants to restore peatland.

Our suggestions for revision of the Draft Climate Change plan are:

- For the next version of the plan to include more information on the role of the shooting industry in reducing climate change
- A requirement for shooting estates to register as such; this overlaps with discussions to introduce shooting estate licencing to address other issues related to shooting estates.

A requirement for any landowner practising Muirburn to have the soil tested annually on a mandatory basis, to provide more data on carbon emissions. This would allow future consideration of withdrawing subsidies from landowners who manage their land unsustainably.

We would be grateful if this could be included for consideration with other responses to the plan.

Jennifer Dunn

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