

Written evidence from the Scottish Moorland Group (SMG)

Introduction

The Scottish Moorland Group (SMG) is part of Scottish Land & Estates (SL&E) and echoes all the comments made by SL&E in respect of the wider aspects of the LRRG report. This briefing is an initial response to those parts of the LRRG report relating specifically to managed moorland (Part Six, pages 151 – 172).

The Scottish Moorland Group welcomes the focus on sporting estates and in particular grouse moors. They are an important part of the Scottish upland environment, economy and culture. Grouse moors cover between 1 million and 1.5 million hectares, equivalent to 12-19% of Scotland's land mass. They ensure 2640 full time equivalent jobs and bring in around £30 million pa to the Scottish economy. They generate significant capital investment in housing and infrastructure in fragile remote areas and are recognised by Visit Scotland as bringing in valuable tourism revenue from the UK and abroad. Grouse shooting is a unique sport, highly valued around the world.

Scotland's grouse moors are seeking a clear indication of support from the Government to give confidence for future investment and employment in the upland economy, and SMG is working with Government, its agencies and other stakeholders to achieve that supportive legislative framework.

SMG recognises that the LRRG remit was to suggest a menu of radical ideas for Government to develop in years to come, and the clear acknowledgement (page 17 paragraphs 17 and 18) that issues cannot be covered in any detail and the LRRG is not an expert group.

Therefore, it is a real concern that the overall tone of the LRRG report is negative about traditional land management such as grouse moors, and that it appears to go beyond its expertise by proposing very specific land use changes.

Flexibility

Part Six of the report leads with the idea that landowners have "*considerable flexibility in how they choose to use their land*" implying that land use decisions are made on a personal whim and could easily be switched. However, especially in remote parts of Scotland, options for viable use of any particular area of land are strictly limited by altitude, terrain, soil and climate. The LRRG report does not make the case convincingly either that grouse moor is an inappropriate use or that forestry is somehow more appropriate.

Current moorland uses have developed organically over centuries; they have been honed by successive generations of farmer and keepers, developed local markets and shaped communities. Upland land uses will continue to evolve as circumstances change, but there would be massive repercussions if a centralised policy was to force dramatic change.

Grouse management does not need subsidy because it has a strong international market, but any move away from that will mean that more public funding would be needed for management of the land and provision of public benefits, and private investment would be lost.

Many of the ideas in the LRRG report will struggle to stand up to serious scrutiny but we are nevertheless keen to engage with the LRRG agenda to identify those which will enhance the public interest. As the LRRG have stated clearly themselves, this is meant to be a report to stimulate discussion and not to provide answers and so we will welcome that discussion. It should be added that we have not been consulted at all in the preparation of this report, either directly, or through the cross sector Moorland Forum and we consider that to be a significant weakness of this report and its approach.

Land Use Strategy

SMG agrees with the thrust of the report about the Land Use Strategy (LUS) giving a public policy framework for land use decisions, and look forward to working with other stakeholders as it develops.

Grouse moors are highly compatible with the three main objectives of LUS:

- Land-based businesses working with nature to contribute more to Scotland's prosperity
- Responsible stewardship of Scotland's natural resources delivering more benefits to Scotland's people
- Urban and rural communities better connected to the land, with more people enjoying the land and positively influencing land use

Grouse moor management also scores well on nearly all of the ten indicators set out in the Land Use Strategy Progress Statement June 2013:

- LULUCF Land use, land use change and forestry GHG emissions
- Gross Value Added GVA in agriculture and forestry
- Scottish tourism visits
- High nature value farming and forestry
- Natural capital asset index NCAI
- Water ecological status
- Terrestrial breeding birds
- Volunteering in nature
- Visits to the outdoors
- Community inclusion in land use decision making

We note that one of the core principles of the LUS is that it is a high level strategy and "*does not set out to provide a blueprint for how individual fields, hills or plots of land should be used*". However, in Section Six paragraphs 23-28 the LRRG report attempts to use LUS as justification for specific proposals to replace grouse moor with forestry. The reasoning put forward is that forestry is more in the public interest, when the reality is the other way around.

Public interest

Grouse moor management is strongly in the public interest in many respects. It provides habitat for a wide range of important birds which is recognised in SSSI and SPA designations.

Grouse moors score highly on the objective of multi-purpose management. A typical grouse moor will have two significant economic enterprises on the same land – grouse shooting and low density stock farming, which will provide the core income, employment and management capability. When managed well they are highly compatible – it is a resilient management model.

In addition, legal predator control protects a wide range of other wildlife, much of it rare and declining elsewhere. Grouse moors are bastions for breeding waders such as curlew, lapwing, golden plover dotterel and redshank, and other declining birds such as ring ouzel. This is a hugely important public benefit, proven by science and well recognised by all bird conservation bodies. Predator control also protects mammals such as the Mountain hare which breed prolifically on many grouse moors because of the predator control.

The process of rotational muirburn prevents the build-up of high fuel loads which cause damage to peat if there is a wildfire. Moorland estates provide a free resource to help with firefighting, something well recognised and appreciated by the Fire and Rescue Service (FRS) in Scotland. Rotational muirburn provides a mosaic of different aged heather which keeps a healthy purple landscape, unique and highly valued by visitors to Scotland. The management of sheep, deer and hares controls the amount of tick which are becoming an increasing human health issue with Lyme Disease. Roads on moorland managed for grouse and agriculture are often used for public access, especially by less able people and mountain bikes.

There is an implication in the report that if an owner chooses a non-subsidised land use such as grouse shooting, he can somehow escape having to conform to the public interests which would otherwise be enforced by the conditions of a subsidy. In fact, public interests are already tightly woven into the whole process of grouse moor management, backed up by extensive legislation, regulation and codes of practice and administered by Government agencies such as SGRPID, SNH and SEPA.

Ecosystem services

The ability of the underlying peatland to lock up carbon, provide clean water and regulate flooding is carefully preserved on a well managed grouse moor. There is emerging science that points to some negatives of careless muirburn as mentioned in LRRG, but that applies when the peat layer is damaged. That only happens at any significant scale where there is catastrophic wildfire, and is very definitely not in the interests of grouse moor management either. Burning regimes can be adapted if the science becomes more clear, and will be covered by the current Muirburn Code review being carried out by the Moorland Forum, and in which moorland managers are closely involved.

These risks are relatively low and manageable compared with the much greater risk to ecosystems if the land was to be used for intensive grazing which is one of the few alternative options. Viable grouse moor management effectively guarantees that the land will not be used for other purposes which can seriously damage those ecosystem services, such as commercial forestry or wind farms. In the north of England grouse moor owners have blocked up over 2000 km of ditches to re-wet moorlands which had been drained after WW2 and that process is under way in Scotland too

SMG believes that grouse moor management is highly compatible with LUS and support that process. Therefore the Land Use Strategy cannot be used as an excuse for widespread afforestation on grouse moors in the east of Scotland; one of the explicit proposals in LRRG, which would be highly damaging for Scotland's moorland. It must be remembered that open heather moorland, with its unique assemblage of birds is very rare in the rest of the world. The UK holds 75% of the entire world resource and most of that is found in Scotland. Therefore we have a duty to look after it.

Forestry on high value grouse moors

The LRRG report suggests that forestry delivers more in the public interest than the management of moorland for grouse shooting, arguing that it would help deliver the woodland creation target of 10,000 hectares a year to 2022. Such a view is, however, to create a black and white picture which fails to acknowledge the multiple benefits delivered by grouse moors.

We suggest that a much more sophisticated understanding of upland management is needed. The simple replacement of open moorland with forestry would result in the direct loss of many rare birds and a precious habitat, with a knock on effects all around forests due to increased fox and corvid predation. Bird conservation bodies make this argument too and it was all set out in the responses to the Woodland Expansion Advisory Group. It is therefore extraordinary that it is now such a central proposal of the Land Reform Review Group.

The climate change argument is used to justify forestry expansion, because trees lock up carbon, but in fact there is significant damage to the underlying peat from the drainage, roading and drying out associated with new planting. Moreover, most timber grown on land currently used for grouse moors would be low grade, likely to be used for wood chips, pulp or external uses – all of which result in the carbon locked up in the wood being released again. Therefore, there is only a temporary lock up of carbon anyway.

The lessons must be learnt from the last time when there was a massive policy swing towards forestry, particularly in the 1960s, 1970s and 1980s. In order to meet Government targets many plantations were planted in the wrong place – too high, too exposed to wind, unstable soils and poor vehicle access – in fact just the sort of ground occupied by grouse moors. The proposals of the LRRG would be to repeat all those mistakes; therefore we would very much welcome a better understanding of the evidence and assessment criteria they have used to formulate their specific recommendations in this area. For commercially viable forestry, the ground needs to be of higher quality and lower down the hill.

So, to plant moorland, which in many cases supports an important economic activity in grouse shooting, with low grade Sitka spruce forestry would be a highly controversial policy. This is not to say, however, that there is no place for woodland in the uplands and the planting or regeneration of native non-commercial woodlands on the moorland edge is a more realistic objective and already being done in strategic places on many grouse moors.

Sporting rates

The LRRG makes a proposal to review the exemption of “shootings” from sporting rates. That would encompass all types of shoot – lowland, rough shooting, driven and walked up shoots, but it attempts to justify this policy by pointing to grouse moors only. The report tries justify this position by stating that that control of wildfires on grouse moors is a significant public cost.

The reality is that the vast majority of wildfires which the Fire and Rescue Service (FRS) have to deal with are around built up areas, tourist hotspots and in recent years the massive fires started by muirburn have been overwhelmingly in the far north and west of Scotland, well away from grouse moors. It is true that muirburn can get out of control on grouse moors, but there is a highly effective system in grouse shooting areas of estates helping each other. They have the right equipment, keepers are experienced in fighting wildfire and are able to get there quickly. In fact moorland estate staff and equipment is an important fire fighting resource much valued by FRS which is often used to help them with wildfires with other causes. If that private sector contribution was quantified and charged for, it could be a significant public cost. It is however something that grouse moor estates are happy to provide as a public benefit.

Further detail is provided in the Appendix to this statement - a summary of the wildfire position in the Grampians (the specific example quoted in LRRG) from the Chairman of the South Grampian Fire Group.

If the cost of fighting wildfires is the reasoning behind re-imposition of sporting rates on grouse moors, then it would not appear to be a robust argument. In addition, the introduction of these rates will have an impact on the ability for businesses to deliver unfunded environmental benefits and more generally will impact on the ability to deliver the aims of the Land Use Strategy. SMG is a willing partner in the delivery of LUS but imposition of additional costs without justification would undoubtedly reduce the ability of estates to provide public benefits.

Appendix

It is misleading and destructive to suggest that muirburn only creates problems for Fire and Rescue Services as suggested in the land reform review. Wildfires have many causes, Landowners give significant assistance to Fire and Rescue Services, and muirburn also helps to prevent even more dangerous and damaging wildfires occurring.

Grampian, the area given as an example in the review is a case in point. Grampian Fire & Rescue Service (GFRS) received substantial assistance suppressing those fires from estates, and also the other 2/3rds of fires, which had other causes. This

assistance was often an organised and effective response, through the estate's mutual assistance organisations, the South Grampian Wildfire Group (SGWG) and the North Grampian Forest Fire Protection Group working in support of GFRS.

The assistance included All Terrain Vehicles with specialist fire fogging units, helicopters paid for by the landowner, radios, four-wheel drive vehicles for off-road transport and collectively hundreds of skilled staff. All of these resources were operating within procedures agreed with the fire service in advance.

Indeed several of the fires in the 2011 – 2013 period were largely extinguished by the efforts of the private estates, because the equipment deployed was fit for purpose and the estate staff had the necessary skills and experience to extinguish this type of fire. Also the estates assisted the fire service with incident command and were on hand to receive control of areas shortly after knockdown, thus relieving the fire service of further responsibility and cost at the earliest stage.

An example is the response to the fire on Balmoral Estate in 2011, which was started by members of the public lighting a campfire, which burnt 120 ha (300 acres) in very inaccessible, steep and rugged terrain and lasted 3 days. GFRS made a limited response in terms of numbers but a crucial response in terms of Incident Command. Local estates including Balmoral Estate and other members of the South Grampian Wildfire Group provided over 60 staff, x4 ATV/fogging units, and the helicopter. Control of the fire was handed-over to Balmoral Estate after initial knockdown at the end of the first day. The fire re-ignited on the second day and was extinguished again by estate fire group members. Balmoral Estate then continued mopping up on the third day and fire patrols continued for several days afterwards.

Another example of the positive engagement of landowners and grouse moor managers on behalf of the community occurred in 2012 where there was a wildfire on Birse Community Trust (BCT) land. This fire started at around 4pm on a Friday evening, probably caused by a dropped cigarette, was spotted by neighbours. Ballogie Estate, a neighbour, organised the fire group call-out. GFRS were in attendance but it was largely put out by large numbers of neighbouring private estate staff, mostly Gamekeepers from nearby Grouse Moors with ATV/fogging units.

Michael Bruce Chairman of SGWG said "I was the senior land manager on-site at the fire on BCT land and had to co-ordinate the response from several different estates. The fire was largely put out by estate owned and operated ATV/fogging units, with some assistance from the fire service, especially with Incident Command. Once knockdown had been achieved control of the fire was handed over to land managers. I then organised the crucial mop-up and patrol phases. I was unable to contact any of the trustees or managers of the Trust but was really pleased that estate workers, who had just spent hours working extremely hard putting out this fire on community land, then volunteered to take shifts through the night to make sure that this fire was really out. They tackled a number of hotspots and smouldering areas. It could easily have re-ignited and become a major problem."

This practical, common sense, mutual assistance arrangement between the estates and the fire service in Grampian has been in place in for over 15 years. Estates across Scotland have shown willingness to develop similar arrangements with the new Scottish Fire and Rescue Service and estates representatives are active

participants on the Scottish Wildfire Forum. The sharing of resources has minimised risks to the public, the environment, and costs to the public purse.

A recent example of this co-operation in Grampian has been the development of a common digital fire mapping system, where crucial estate level information, such as the location of fire ponds or HGV passable tracks was collected, digitised and is then being lodged on the fire service control room maps. This has been achieved through partnership including SFRS, CNPA, SGWG and four local estates who contributed both some of the projects funding and the staff time to provide the information. The intention is now to roll this system out nationally.

Estates are also involved in many aspects of fire prevention at a variety of levels. At a local level in periods of high fire danger estate staff patrol known high risk areas and make sure inappropriate campfires and BBQs are extinguished. At a strategic level estates are involved through the Scottish Wildfire Forum developing national initiatives. It should be noted that there have been far fewer wildfires in 2014. The situation is improving.

Each tool or technique used for the suppression of wildfires is limited with the length of flames, the fire intensity, it can deal with. This even includes helicopters which can only cope with flames that are a maximum of 4m high. There are several examples of fires in the period 2011 – 2013 that had high fire intensities, were not caused by muirburn and were only able to be extinguished when the fire reached areas of previous muirburn with less fuel, where the flame height dropped sufficiently to become controllable.

This means that one of the biggest public benefits from muirburn is that it reduces fuel load hazards over wide areas. With less fuel to burn muirburn helps to reduce the intensity of fires and therefore make them easier to control in the future. Fuel hazard reduction using prescribed burning is a well-known fire prevention or reduction technique used by fire managers around the world. Carrying out prescribed burning is also acknowledged as being one of the best training opportunities for wildfire suppression.

The vast majority of muirburn is carried out successfully with no problems at no cost to the public purse. Improvements in technique can be made. Fire prevention activities, including muirburn, can be improved through the work of the Scottish Wildfire Forum, a revised Muirburn Code and training. The recently announced Scottish Government “Wildfire Operations Guidance” gives a clear indication of the importance the Scottish Government and the fire service give to working with land management partners.

The imposition of shooting rates on all estates, for the express purpose of paying for Fire & Rescue Service costs would appear to be a collective punishment that will have unintended consequences. Other countries, such as New Zealand have adopted different and far more positive solutions, for example providing a publicly available Fire Danger Rating System that helps prevent unwanted wildfires occurring in the first place.

Notes:

- Michael Bruce is owner of Glen Tanar Estate in Aberdeenshire, he has been a registered Lantra Awards trainer for forest and moorland fire fighting since 1997. He is also currently Chairman of the South Grampian Wildfire Group, Vice-Chairman of the Scottish Wildfire Forum and has been a member of the team of Forest Fire Experts of the United Nations ECE FAO since 2003.
- The South Grampian Wildfire Group was established in 1997. In 2013 the resources available to support GFRS/SFRS was as follows:

SGWG RESOURCES 2013

No.

Number of Estates / Agencies

64

Personnel

253

Fire Suppression Equipment

Fire fogging systems (ATV mounted)

23

Fire fogging systems (trailer mounted)

4

Fire Beaters (in fire sheds)

1000+

Small pumps

21

Foam Systems (medium expansion & fogging lance)

4

Knapsack sprayers

17

Portable dams

9

Trailer tankers & Slurry tankers

12

Back-burning kits (heather burners & drip torches)

45

Tractor driven chain swipes (cutters)

7

Chainsaws (operated by competent person)

17

Transport

4WD Vehicles, (Land-Rovers, Pickups & Jeeps)

123

All Terrain Cycles (Quad bikes & 6 wheel bikes)

23

4WD Tractors

44

Radios (with emergency frequency)

153