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Dear Karen,

Response to the Stakeholder Questionnaire

The Moorland Forum strives to achieve consensus between the different interest groups represented by the 28 member organisations (see Appendix 1), but it has not been possible, in the time available, to provide a detailed response to the questions to reflect the views of all members.

This response is submitted on behalf of all Forum members, and is based on the recent and planned activities of the Forum. It provides some general comments in support of the evidence gathering process being carried out by the Grouse Moor Management Group (GMMG), and includes some points about the grouse moor management practices under consideration.

General Comments

The Moorland Forum exists to promote partnership working and to deliver action founded on available evidence and consensus. This is set out in the Forum's document [Partnership for Delivery](#) that is available on the Forum's website.

There is a tendency for some interests to see grouse moor management as entirely bad. However, the benefits that can arise for habitats and species, beyond those directly connected to grouse moor management, should also be acknowledged.

The general acceptance of the principles of peatland management is an example of the willingness of the grouse moor industry to adapt to change. It is interesting to note that when the original [Principles of Moorland Management booklet](#) was published by the Moorland Forum in 2003, it contained only one reference to peat; how that has changed!

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The Principles of Moorland Management (PoMM) project is one of the current areas of activity for the Forum, and the original [Project Plan](#) is available on the Forum's website. This work provides an outlet for the expertise available to the Forum, and it seeks to develop guidance for practitioners on a range of topics with a view to steering management towards the use of best practices. The guidance also provides a baseline for assessing management that is taking place in an area.

Another important feature of the PoMM project is that it provides an opportunity for all interest groups to work together. This allows organisations to learn about different views and encourages the level of compromise that is necessary to reach agreement about the content of the guidance documents.

The PoMM guidance does not seek to establish a 'one-size-fits-all' approach. It is thought more appropriate to set out principles that can be adapted to suit the particular circumstances of a moorland area.

A further advantage of the PoMM guidance approach, is that subject to obtaining appropriate approval from the project's Steering Group, it is possible to adapt the guidance easily to take account of changes to knowledge from research or experience. This makes it more flexible and responsive to change than regulation.

A list of the completed PoMM guidance, and topics that are under development, is at Appendix 2.

Raptor Persecution

The [Understanding Predation](#) (UP) project demonstrated that the views of practitioners and researchers are more closely aligned than might have been expected. The project encouraged the belief that there is a way for stakeholders to work together, although it was recognised that some bold decisions and a willingness to compromise would be required.

Working for Waders (WfW) is a successor initiative, and by seeking to combine evidence and practice, it has adopted the principles established by the UP project. As this initiative gathers momentum it will become a focus for research, dissemination of good practice and above all, action on the ground. This initiative was set up with support from the Moorland Forum, but is now independent of it.

Predation Management

The Moorland Forum has not been as active on the topic of predation management, as the preference has been to leave this to those members with the necessary, specialist knowledge. However, there is general recognition that predation management is an integral part of moorland management, and it is essential that any management is carried out in complete compliance with current regulations.

There is a proposal that the Forum should assist SNH with the development of a Code of Practice for Trapping and members have expressed a willingness to contribute to this work. It is for SNH to decide if this Code should be developed, and if the work progresses, it will be carried out as part of the PoMM Project.

Muirburn

The revised version of the Muirburn Code was launched in September 2017. The project to review the Code followed a critique of the previous Code carried out as a separate project. Both phases of work were commissioned by the Scottish Government from the Moorland Forum.

The review of the Code is seen as only the first step in the process. The revised Code satisfies the requirement to set out the regulatory requirements but further guidance is proposed, in the form of Supplementary Information, to provide more information for practitioners that will encourage the adoption of good practices and better targeting of muirburn and cutting operations. It is not envisaged that the Code will need to be revised often, but it is intended that the Supplementary Information will evolve to reflect changes in evidence, techniques and equipment.

The overall aim of the Code and the Supplementary Information will be to ensure that burning and cutting operations are only carried out where they will: achieve clearly agreed objectives, add value and use good practices.

Heather Cutting was considered by a Forum working group and [PoMM guidance](#) was published in March 2018. The guidance compares the features of burning and cutting and promotes cutting as a viable alternative to burning. With modern, smaller, cutting equipment, it is possible to apply management techniques that were not available using older equipment. These techniques can be complementary to burning management, but they can also be applied independently.

Mountain Hares

[PoMM guidance](#) was published in March 2018; it aims to provide the owners and managers of land with:

- Sufficient understanding of the issues to make an informed decision about how they wish to approach their mountain hare population;
- An understanding that over-exploitation of mountain hare is to be avoided at all costs;
- Guidance about how to establish a sustainable management plan, including the techniques to employ to monitor the impact that their management plan is having; and
- A template for a management plan.

The guidance does not assume that any management is required, but if it is decided that some management of the mountain hare population is appropriate, the guidance seeks to ensure that the management is sustainable in the short and long term, and over large areas.

Further work is planned to provide guidance about monitoring mountain hare populations and to provide additional background information relevant to the management of this species.

Medicated Grit

[PoMM guidance](#) was published in March 2018; it aims to provide the owners and managers of land with a population of Red grouse with:

- Sufficient understanding of the issues to make an informed decision about whether or not to implement a worm control programme,

- Sufficient knowledge to carry out disease control in a legal, responsible and sustainable manner, and
- Information about the different techniques that can be used.

The guidance encourages a careful consideration of the risks, costs and potential benefits before implementing a worm control programme.

Regulation, Licensing and Codes of Practice

This is an area of the questionnaire that it is difficult to reflect the views of all Forum members without being able to canvass their views, however some general comments are made:

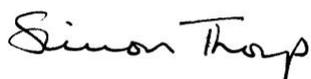
- Enforcement of existing laws and Codes of Practice.
 - The development guidance and codes of practice with input from all stakeholders is an approach that has been supported by members of the Forum.
 - At the start of the PoMM project, a schedule of potential topics was prepared with a view to covering these in events as part of SNH's Sharing Good Practice programme. Such events could be a good way to explain guidance / codes of practice to practitioners.
- Licensing
 - If it is decided to consider licensing of grouse moors, it is anticipated that Forum members would be willing to assist with a review of the proposals and alternative options.

Summary

The guidance produced by the PoMM project is seen as being an important tool for influencing moorland management and for establishing good practice.

The Moorland Forum stands ready to support the review process being carried out by the Grouse Moor Management Group and would be pleased to ask its cross-sector membership to evaluate draft recommendations.

Yours sincerely



S P R Thorp
Director

Appendices

1. Members of Scotland's Moorland Forum
2. Principles of Moorland Management Guidance Topics

Members of Scotland's Moorland Forum

<i>Association of Deer Management Groups</i>	<i>National Trust for Scotland</i>
<i>British Association for Shooting and Conservation</i>	<i>Royal Institution of Chartered Surveyors in Scotland</i>
<i>British Deer Society</i>	<i>Royal Society for the Protection of Birds Scotland</i>
<i>British Trust for Ornithology (Scotland)</i>	<i>Scottish Association for Country Sports</i>
<i>Cairngorms National Park Authority</i>	<i>Scottish Countryside Alliance</i>
<i>Confor</i>	<i>Scottish Environment Protection Agency</i>
<i>Crofting Commission</i>	<i>Scottish Gamekeepers' Association</i>
<i>Forestry Commission Scotland</i>	<i>Scottish Government</i>
<i>Game and Wildlife Conservation Trust</i>	<i>Scottish Land & Estates</i>
<i>Heather Trust</i>	<i>Scottish Natural Heritage</i>
<i>James Hutton Institute</i>	<i>Scottish Raptor Study Groups</i>
<i>John Muir Trust</i>	<i>Scotland's Rural College (SRUC)</i>
<i>Loch Lomond & The Trossachs National Park Authority</i>	<i>Scottish Water</i>
<i>National Farmers Union Scotland</i>	<i>Scottish Wildlife Trust</i>

Principles of Moorland Management Guidance Topics

Guidance published

Topic	Lead
Heather Cutting	RICS
Mountain Hare	GWCT
Worm control in Grouse	GWCT

Guidance under-development

Topic	Lead
Trapping code of practice	SNH
Sheep tick guidance	GWCT
Mountain Hare monitoring	GWCT
Wader Management	WfW
Muirburn Code – Supplementary Information	Moorland Forum
Fire Danger Warning	Firebreak Services
Open Land	TBC
Uplands Manifesto	Moorland Forum
Commons Grazing	SRUC
Herbivore Impact Assessment	SRUC