

## Section 1 – Licensing of Grouse Shooting

1 Do you agree that the licensing of grouse shooting should be introduced to deter raptor persecution and wildlife crime linked to grouse moor management?

Not Answered

2 If you answered 'No' to question 1, please state what other option/s you think we should consider (max 150 words).

If you answered 'No' to question 1, please give us your views:

3 Do you agree that the landowner/occupier/person responsible for or accountable for the management decisions and actions should be responsible for acquiring and maintaining the licence for the taking of grouse on a particular piece of land?

Not Answered

4 If you answered 'No' to question 3, please state what other option/s you think we should consider (max 150 words).

If you answered 'No' to question, please give us your views:

5 Do you think that the person wishing to shoot grouse on land that they do not own, or occupy, should be required to check that the person who owns the land has a licence which allows for the taking of grouse on that area of land?

Not Answered

6 If you answered 'No' to question 5, please state what other option/s you think we should consider (max 150 words).

If you answered 'No' to question 5, please give us your views:

7 If we introduce a licensing scheme, do you agree that NatureScot should be the licensing authority?

Not Answered

Other body (please specify):

8 Do you think that a licence should be granted for a maximum period of one year (renewable on an annual basis thereafter)?

Not Answered

9 If you answered 'No' to question 8, please state what other option/s you think we should consider (max 150 words).

If you answered 'No' to question 8, please give us your views:

10 Do you think that the civil rather than the criminal burden of proof is an acceptable test for the application of sanctions in relation to grouse moor licences?

Not Answered

11 If you answered 'No' to question 10, please state what other option/s you think we should consider (max 150 words).

If you answered 'No' to question 10, please give us your views:

12 Do you agree that record keeping or reporting requirements should be part of the licence conditions?

13 If you answered 'neither' to question 12, please outline why you believe this (max 150 words).

If you answered 'Neither' to question 12, please give us your views:

14 Do you agree that, where a person holds a valid licence, and there is sufficient evidence to show that, on the balance of probabilities a wildlife crime has been committed on their property, NatureScot should have the power to impose the following penalties:

Not Answered

15 If you answered 'no' to question 14, please outline why you believe this (max 150 words).

If you answered 'No' to question 14, please give us your views:

16 Please provide any further comments on the questions in this section here.

Please give us your views:

Whilst we consider the main purpose of the proposals to license grouse shooting (to address the on-going issue of wildlife crime and in particular persecution of raptors on grouse moors) to be out with the locus of Fisheries Management Scotland, the Code of Practice for grouse moor managers is described in relation to habitat and species management for protection of the natural environment and biodiversity has wide environmental implications for biodiversity. With that in mind we would offer the following comments in relation to the code. Consistent with our comments on the Muirburn Code below, we believe that full compliance with the code should be a condition of the licence.

As a range of land-uses, including management of grouse moors, can have a direct bearing on the water environment, we would be keen to be consulted on the Code as it is under development. It is important to recognise that Scotland's freshwater systems are highly vulnerable with aquatic biodiversity under intense pressure, and the Code should therefore cross reference to the Muirburn code but also cover aquatic, riparian and wetland management. This would include water quality protection (from chemicals/pharmaceuticals), land drainage interventions and protection of riparian habitat.

## Section 2 - Muirburn

17 Currently a licence is only required to undertake Muirburn outwith the Muirburn season. Do you agree that a licence should be required to undertake Muirburn regardless of the time of year that it is undertaken?

Yes

18 If you answered 'No' to question 17, please outline why you believe this (max 150 words):

If you answered 'No' to question 17, please give us your views:

19 If we introduce a licensing scheme, do you agree that NatureScot should be the licensing authority?

Yes

20 Do you agree that there should be a ban on muirburn on peatland unless it is done under licence as part of a habitat restoration programme approved by NatureScot?

Yes

21 Other than for habitat restoration, public safety (e.g. fire prevention), and research, are there any other purposes for which you think muirburn on peatland should be permitted?

No

22 Do you agree that the definition of peat set out in the muirburn code should be amended to 40 cm?

No

23 If you answered 'No' to question 22, please outline why you believe this (max 150 words):

Please give us your views:

This should be decided once the review of the definition of 'peatland' has been carried out, so a uniform approach across other sectors (e.g. forestry) can be ensured.

24 Please provide any further comments on the questions in this section here.

Please give us your views:

We are supportive of the proposal to make Muirburn a licensed activity regardless of the time of year. In doing so we consider that full compliance with the Muirburn code should be a condition of the licence. In particular, we consider that avoiding burning on steep slopes and right up to watercourse edges are of particular importance. Whilst these issues are covered by the Muirburn Code, our members feel that the occurrence of these practices is still all too common. Any licences granted should be subject to appropriate compliance checks by NatureScot.

In making the above comments we highlight how vulnerable freshwater systems are and that the current consultation is an opportunity to provide some protection to our freshwater environments in the light of the wild salmon crisis and wider biodiversity crisis. Our members are making huge efforts, often using government funding schemes, to restore riparian areas. These enhancements can be offset by damage to riparian zones in other areas and we think that all riparian zones should be afforded a high protection status and no burning should occur within them. This would need enforcing with a significant penalty system to avoid accidental encroachment of Muirburn into riparian zones.

## Section 3.1 Wildlife Traps

25 The Scottish Government proposes that a person operating a wildlife management trap must apply for a unique identification number which they must then attach to any traps that they set outdoors, do you agree that this proposal should apply to (select all that apply):

Other Traps (please specify):

26 The Scottish Government proposes that a person operating a wildlife management trap outdoors must successfully complete an approved course dealing with the relevant category of trap, do you agree that this proposal should apply to (select all that apply):

Other traps (please specify):

27 This question should only be answered if you agree that training should be required for at least one of the traps listed in question 26. The Scottish Government proposes that a person operating a wildlife management trap outdoors must undergo refresher training every 10 years, do you agree that this proposal should apply to: (select all that apply)

Other traps (please specify):

28 Do you agree that record keeping and reporting requirements should be part of the registration scheme?

29 Do you agree that an individual found guilty of the offence of:

Not Answered

30 If you answered no to question 29 please explain the reason for your answer (max 150 words):

Please give us your views:

31 Please provide any further comments on the questions in this section here.

Please give us your views:

### Section 3.2 Glue Traps

32 Do you agree that the use of glue traps designed to catch rodents should be banned in Scotland?

Not Answered

33 Do you agree that the sale of glue traps designed to catch rodents should be banned in Scotland?

Not Answered

34 Do you agree that there should be a two year transition period before the ban on glue traps comes into force?

Not Answered

35 Please provide any further comments on the questions in this section here.

Please give us your views:

### Section 3.3 Snares

36 Do you agree with the recommendations from the statutory review of snaring that operators should be required to update their records at least once every 48 hours, unless they have a reasonable excuse not to and that these records should be made available to the Police on demand if the police arrive at the location where the records are kept, or within 7 days to the police station?

Not Answered

37 Do you agree that a power of disqualification should be introduced for snaring offences?

Not Answered

38 Please provide any further comments on the questions in this section here.

Please give us your views:

### About you

39 What is your name?

Name:  
Alan Wells

40 What is your email address?

Email:  
general@fms.scot

41 Are you responding as an individual or an organisation?

Organisation

42 What is your organisation?

Organisation:  
Fisheries Management Scotland

43 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

44 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

45 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

46 Organisation's Sector

Conservation, including representative bodies

Other body (please specify):

Evaluation

47 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: