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Gillian Martin
Cabinet Secretary for Climate Action and Rural Affairs
Scottish Government

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Cc. Jim Fairlie
Minister for Agriculture, Marine and the Islands
Scottish Government

Dear Cabinet Secretary,

We are writing in light of the recent wildfires across Scotland. Our thoughts are with the communities affected and with everyone involved in tackling these fires.

These events have led to new debate about muirburn and the new licensing system. While we recognise the seriousness of the wildfire risk facing Scotland, we do not believe the recent fires provide a case for weakening or reversing muirburn licensing, given that unlicensed muirburn has itself been the cause of several recent wildfires which have damaged our National Nature Reserves.

Wildfires are becoming more common across Europe as our climate changes. Longer periods of hot, dry weather increase the risk of large fires across a range of habitats and land uses. This is a challenge that will continue to grow in the years ahead.

The causes of wildfire are complex, and no single land management practice can remove the risk. Scotland's largest wildfire last year at Dava and Carrbridge burned across a landscape where much of the ground had been managed through muirburn. This shows that muirburn alone cannot prevent large wildfires.

It is recognised that some wildfires start as managed burns. Good regulation, clear standards and proper oversight help reduce those risks. Licensing should be seen as part of responsible land management, not a barrier to it. There also needs to be greater focus on preventing fires from starting in the first place. Public awareness, early detection, rapid response, robust and resilient landscapes and facilities, and good planning all have an important role to play.

Decisions about land management should reflect the objectives for a particular site. For some land managers, muirburn may form part of their approach. For others, especially those focused on nature recovery, peatland restoration or native woodland expansion, it may not. A range of management options exists and no single approach is suitable everywhere. The suggestion that widespread muirburn is essential for wildfire prevention is

not supported by experience across all land types. Many areas with high fuel loads are managed without regular muirburn. Reducing wildfire risk depends on good planning, preparedness and appropriate management for local conditions.

The new licensing framework must be a proportionate and necessary step towards improving oversight of an activity that can have significant impacts on peatlands, wildlife and carbon storage. We supported the draft muirburn code that came out of the Government's Wildlife Management consultation in October 2022 and are concerned that it may already be weakened before it is even implemented. As Scotland works to address the nature and climate crises, it is important that decisions continue to be guided by evidence and by the long-term public interest.

We encourage the Scottish Government to maintain an evidence-based approach to wildfire policy and to continue developing measures that strengthen Scotland's resilience to future wildfire risk.

Yours sincerely,
Deborah Long

Chief Executive
Scottish Environment LINK

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