

## **Response to Cairngorms National Park fire management byelaw consultation Sep-Dec 2024**

The Cairngorm National Park Authority are seeking views on the draft wording of the fire management byelaw through three questions:

1. Do you agree with the wording of the byelaw as set out at Annex 1?
2. Do you propose any changes to the wording as set out at Annex 1?
3. Do you have any other comments on the proposed byelaw?

Considering the Fire Management Byelaw consultation document led us to identify two aspects:

- The implications of the wording in the proposed byelaw, and
- The implementation of the byelaw if approved.

Our response to the initial consultation in the spring of 2024 was a preference for enhanced communication and education, that creating a byelaw could be an expensive management tool, and that we believe it to be a measure of last resort.

Awareness of the potential impact and consequences of wildfires needs to be communicated to anyone starting a fire, be it recreational or for habitat management, so it seems sensible and sustainable to start with enhancing communications and education; to raise awareness of the challenges of open fires and to change the behaviour for recreational fire use and how to have a fire safely in the appropriate circumstances.

To answer the consultation questions:

1. Yes. The wording of the proposed byelaw is clear and brief. Mountaineering Scotland supports the acknowledgement of the use of camping stoves as they are normally used; the responsible use of camping stoves is often an essential part of hillwalking, climbing or wild camping.

We support the inclusion of both fireplaces in the definitions, where there is a cultural tradition of lighting fires in bothies for warmth.

2. No. Mountaineering Scotland proposes no changes to the wording as set out in the consultation

3. We support efforts to change the behaviour of people engaged in recreational fire use, and not merely enforce the regulations of a byelaw. Enforcement is a matter that is restricted to the Park Authority Ranger Service and the police, however there are other Ranger services within the Park boundary who may come across visitors with open fires. Their role will be advisory, not regulatory and how this difference is managed is important for public understanding and compliance.

A Communication Strategy is, in our opinion, an essential companion to the establishment of a byelaw for recreational fires. This would align the different Ranger services with a unified approach to engaging with visitors, and promote and reinforce responsible behaviour messaging.

For example, general awareness across the Park, and indeed throughout Scotland, of using a camping stove in times of high fire risk as determined by SFRS is necessary for visitors to understand. The relationship with muirburn regulated by licence is also important to communicate.

We note that there may be potential issues of interpretation if a portable wood-burning stove is used for cooking food. Currently not a very common means of cooking but awareness of how to manage this is important for countryside staff to know.

**4 December 2024**

