



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Preparing for a Changing Climate: Second Consultation to Inform Scotland's Climate Change Adaptation Framework (www.scotland.gov.uk/Publications/2009/04/23145206/0)

The Mountaineering Council of Scotland (MCOFS) is recognised by the Scottish Government as the representative body for hillwalkers, climbers and ski-tourers. We have 10,000 members and aim to represent the interests of all the estimated 400,000 regular Scottish mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment. The MCOFS is supportive of addressing climate change urgently, but in a responsible manner. Among other actions, the MCOFS promotes sustainable transport use to our members. Our website at www.mcofs.org.uk/access-and-conservation.asp has a copy of the MCOFS position statement.

The MCOFS would like to congratulate the Scottish Government on the recognition of the highly vulnerable nature of Scottish biodiversity in the mountains in section 1.1 addressing natural environment and resource management. We welcome the prominence given to this environment and the, "potential loss of distinctive Scottish biodiversity (e.g. mountain habitats); biodiversity which helps to regulate the climate (e.g. peatland), reduces vulnerability to flooding (e.g. wetland and machair), and provides other ecosystem services (e.g. grouse moors)."

Mountain environments experiences very high levels of vulnerability to climate change. This is because there is little capacity for adaptation through migration or habitat (re)creation. Actions used to address climate change challenges to other habitats, such as woodlands, often are not applicable to the mountain environment partly due to the fact that climate change is likely to reduce the overall total potential area of land in Scotland where these types of habitat can exist. This is because the upland habitats dependence on the prevailing extreme weather and soil conditions that advantages specialist biodiversity that are adapted to these challenging conditions, but disadvantages widely distributed generalist species, and therefore usually more common species. These specialists are less effective at competing with the generalist, which are the species that are, with climate change, able to migrate into the areas.

The above point relates to the stamen in 1.5 that states, "When a subject (whether a species, a service or community group) is already under considerable pressure, there may be fewer options available for the subject to adapt, essentially creating a barrier to effective adaptation. For example, there will be fewer adaptation options open to Scotland's valuable biodiversity if it also faces significant additional pressures from pollution and habitat loss." This needs borne in mind when policies and actions are formulated to tackle climate change and its consequences. This includes policies driving the spread of renewable energy developments and associated infrastructure. It should also be considered the impacts on resources other than biodiversity or services. This includes the landscape.

Section 2.1 on Climate change adaptation states that, "without adequate planning, adaptation is likely to be ad hoc, responsive, and lead to worse outcomes than could have been achieved." This is not purely in terms of climate change outcomes but also may include "worse outcomes" in terms of

other resources such as services, biodiversity and landscape. For this reason, a Scotland-wide strategic plan is urgently needed for energy developments in order to maximise adaptation of our energy sources mix without incremental loss of landscape, wildness characteristics and biodiversity. This should be part of the Action Plan in the Annex as necessary to equip decision makers with a country-wide strategic approach to maximize the positive outcomes and minimize the negative outcomes.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus
Access & Conservation Officer