

Consultation on Wildfires in NI

Draft Strategic Way Forward

Comments by

Northern Ireland Environment Link

20th June 2023

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 66 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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NIEL welcomes this consultation. According to the NI Fire and Rescue service there were more than 1,000 wildfires in the Mourne between 1 April 2016 and 31 March 2020¹ so that does not include the major wildfire on Slieve Donard in April 2021 so a strategy to deal with wildfires is therefore welcome. However, this consultation just outlines basic principles on how certain things should be done and lacks detail, in particular, SMART targets. For example, one would not expect any opposition to the proposed goal “To reduce the numbers of wildfires” or “To lessen the impact of wildfires on the environment, society and the economy.” However, what is missing from these goals is the detail as to what those goals mean in practice, how the department is proposing those goals are to be achieved, what will be done, by whom and by when. This lack of detail also limits the feedback that can be provided on this consultation. NIEL would recommend that the department should provide greater clarity on what will be done, by whom and by when and how all of the proposed actions are to be implemented.

Section 1.2 of the consultation refers to the role of human activity in causing wildfires and echoes the views of the NI Fire and Rescue Service (NIFRS) which stated in a press release in April 2023² that the NIFRS dealt with 1,239 wildfires in 2022 and

“All of these wildfires were caused by human behaviour and are preventable if everyone is vigilant to the risks of wildfire.”

This also makes the point that working with communities is a very important part in reducing wildfires, as illustrated by work to reduce wildfires in Castilla y Leon Spain³. However, ignition sources are not the only human factor to be accounted for. The strategy correctly identifies that much of our landscape has become much more susceptible to fire, largely as a result of longer term human (mis)management including increased drainage and over grazing but it is important to account for other management practices that can help reduce the threat from wildfires and not just the potential sources of the wildfire.

Given the particular prevalence of wildfires in upland areas, as acknowledged in the draft document, and the overlap in wildfire prevention and control measures with habitat and biodiversity management, any wildfire strategy should take account of the wider policy and practice context for upland land management. This would set wildfire prevention efforts in the appropriate context of multi-issue land management, where the former is just one threat or disturbance that land managers are dealing with along with issues like habitat enhancement and recreation management. As it stands, the document deals with the wildfire issue in a rather isolated way when it ought to be dealt with in a more integrated manner given the range of land management practices that will affect the susceptibility of our uplands to wildfires.

The recognition in section 1.3 of the increased threat of wildfires and associated impacts as a consequence of climate change and changing weather patterns is welcome.

NIEL believes that it would be essential to also address wildfire issues in other relevant strategies such as a land management strategy.

The draft strategy is quite scant on specifics, and suggests this detail will be in the implementation plan, meaning that it will be the implementation plan that will require and benefit most from appropriate feedback from stakeholders and the public. It is suggested that the strategy includes a clear 'plan do and review' process for the NI wildfire implementation plan but this must surely include a transparent mechanism for stakeholder engagement.

3. Consultation Questions

3.1 In relation to the Strategic Way Forward outlined. Do you agree with the 5 Strategic Goals? Do you have any comments to make in relation to the 5 Strategic Goals?

As outlined in paragraph 2.1. of the consultation document the 5 Strategic Goals are:

- To reduce the numbers of wildfires.
- To lessen the impact of wildfires on the environment, society and the economy.
- To have a framework for partnership working and shared resources for wildfire prevention, strategic planning and interagency response.
- To build resilience into those landscapes and habitats most susceptible to wildfire and reduce the risk and/or severity of wildfires.
- To have communities that are aware and prepared for wildfire events.

NIEL broadly agrees with the five strategic goals but would question the need for the first goal (to reduce the number of wildfires) in light of the second goal (to lessen the impact of wildfires). Perhaps the first two goals could be combined in a goal "*To reduce the incidence, scale and impact of wildfires*".

As regards the impacts, in addition to the air quality and water quality implications and economic costs, wildfires can have serious impacts on human health though there was little or no reference to that in the consultation document. Smoke from wildfires can pose serious health risks as many of the particles in smoke can be small enough (PM_{2.5}) to get deep into the lungs and pass directly into the bloodstream. The health risks are especially high for firefighters. In fact, the WHO International Agency for Research on Cancer (IARC)⁴, classified occupational exposure as a firefighter as carcinogenic to humans (Group 1), on the basis of sufficient evidence for cancer in humans. In other words, occupational exposure as a firefighter causes cancer.

None of the five strategic goals has SMART targets associated with it and this needs to be addressed.

Although the year in which the Interdepartmental Group was established was not specified, the consultation does refer, in section 1.7, to the fact that after the wildfires of 2011 “a Northern Ireland Wildfire Stakeholder Group was subsequently established to address the wildfire issue”. Greater detail on what this group does and has achieved would have been useful as, for example, it is not clear from the consultation document what role that group played in developing the goals and themes which are the subject of this consultation. It is not clear for example, if that group would be responsible for developing a strategic plan for wildfires as outlined in section 3.2?

As regards building resilience into those landscapes and habitats most susceptible to wildfire and reduce the risk and/or severity of wildfires, NIEL would refer the department to the conclusions of the IUCN Peatland Programme. In its 2020 position statement on burning and peatlands⁵, the IUCN stated that

“the most effective long-term sustainable solution for addressing wildfire risk on peatlands is to return the sites to fully functioning bog habitat by removing those factors that can cause degradation, such as drainage, unsustainable livestock management and burning regimes.”

In other words, the best way to reduce the impact of wildfires on peatlands is to restore peatland hydrology and ecology through raising water levels (re-wetting). According to the IUCN UK Peatland Programme, the current body of available scientific evidence indicates that burning on peatland can result in damage to peatland species, microtopography and wider peatland habitat, peat soils and peatland ecosystem functions and concludes that healthy peatlands do not need burning for their maintenance. The IUCN also states that re-wetting and restoring will naturally remove the higher fuel load from degraded peatland vegetation⁶.

A large proportion of our uplands that are at risk of wildfires are within designated sites though much of this is in unfavourable condition, which could also make it more vulnerable to wildfires. According to DAERA’s Environmental Statistics Report 2023⁷, 75% of designated bogs and 86% of designated heathlands are not in favourable condition. In many cases, the hydrological integrity of those sites has been compromised and are drying out, making them more vulnerable to wildfires. These designated sites are home to many species of plants and animals of conservation concern. The restoration of designated sites must be a priority and the government has a statutory duty to ensure that these sites are kept in favourable condition.

3.2 Do you agree with the 6 Strategic Themes? Do you have any comments to make in relation to the 6 Strategic Themes?

As outlined in paragraph 2.2. the 6 Strategic Themes are :

- Governance
- Engagement
- Land Management
- Response
- Policy, Legislation and Enforcement
- Evidence

Generally these themes would be appropriate but there is a lack of clarity in relation to how and when they will be implemented in part due to a lack of SMART targets in the consultation document.

3.3 Do you agree with the Recommendations for Action? Do you have any comments to make in relation to the Recommendations for Action?

The recommendations for action are generally on the right lines, but again there is an issue with the lack of detail.

Many of the recommendations are relevant to and cut across more than one strategic theme and in that should be properly accounted for example by labelling each recommendation with the themes to which it is relevant.

Developing a 5 year action plan, as outlined in the first proposal, would be a welcome and necessary action and if and when that action plan is developed it is essential that it is built on appropriate SMART targets, currently lacking in this draft consultation document and that may well require further ongoing engagement with stakeholders.

The proposals for the Strategic Wildfire Group to report annually on the implementation of the Strategic Action Plan (proposal 2) and to undertake a 3 year review of the Strategic Way Forward and the Strategic Action Plan (proposal 3) are welcome.

Generally speaking, NIEL supports the remaining recommendations for action, but would make the point that a greater level of detail should be provided in relation to the proposal and recommended action. NIEL welcomes recommendation 21, to undertake a review of all

existing legislation concerning burning of vegetation to assess adequacy of legislation governing wildfires and prescribed burning as NIEL believes the existing legislation in this area needs to be updated. In addition to a review of the legislation in this area, there will need to be a greater emphasis on monitoring and enforcement, in this and other areas of environmental law. The lack of an independent EPA is a major issue and NIEL repeats its call for the commitment in New Decade, New Approach⁸ to establish an independent Environmental Protection Agency to oversee and enforce all relevant environmental legislation in collaboration with corresponding bodies across the UK and the Republic of Ireland, to be fulfilled as soon as possible.

¹ <https://www.bbc.co.uk/news/uk-northern-ireland-57663537>

² <https://www.nifrs.org/be-vigilant-to-help-prevent-wildfires-this-summer/>

³ Presentation by Dr Peter Moore at UK Wildfires Conference Belfast November 2022
<https://www.ukwildfireconference2022.org/presentations/>

⁴ https://www.iarc.who.int/wp-content/uploads/2022/07/pr317_E.pdf

⁵ <https://www.iucn-uk-peatlandprogramme.org/news/burning-peatlands-position-statement#:~:text=The%20most%20effective%20long-term%20sustainable%20solution%20for%20addressing,as%20drainage%2C%20unsustainable%20livestock%20management%20and%20burning%20regimes>

⁶ Ibid.

⁷ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2023.pdf>

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf