

NFU evidence to Efra committee inquiry: Wildfire risk and response

Summary

1. The National Farmers' Union of England and Wales (NFU) represent 43,000 farmer and grower businesses and 70% of farming land across England and Wales. Our trade association is the largest farming organisation in the UK, providing a strong and respected voice for the industry
2. Wildfire is a rapidly increasing risk for England and Wales. The 2025 wildfire season saw nearly 48,000 hectares burned across the UK¹, seven times the annual average recorded between 2006 and 2024. More than double the earlier peak year of 2022².
3. The NFU's view is that England's increasing wildfire situation is predominantly a land management issue. Active vegetation management is, in our opinion, the most effective tool available for reducing wildfire risk. Agricultural and environmental policy must support active land management, not restrict it without providing workable and funded alternatives to managing wildfires.
4. The Heather and Grass etc. Burning (England) (Amendment) Regulations 2025³ were implemented without a full wildfire risk impact assessment and should be reviewed urgently.
5. The NFU recommends that the UK Government commit to developing and publishing a National Wildfire Strategy for England and Wales. This should set clear national standards for wildfire prevention, preparedness, and response, applying to all relevant bodies including the Fire and Rescue Services, local authorities, Natural England, the Forestry Commission and Highways England. The Strategy would also recognise the vital role farmers as land managers play in managing landscapes to minimise wildfire risks and the valued role they play in assisting emergency services when action is needed to resolve wildfires.
6. Furthermore, the NFU believes that;
 - a. Monitoring and data collection on wildfire cause, extent and impact remains inadequate. A standardised national dataset is urgently needed.
 - b. Emergency Services should be supported with dedicated wildfire training, equipment, and funding.
 - c. Public engagement on wildfire ignition risk must be consistent, sourced, and year-round including use of the Countryside Code as a means of public engagement.

How can land management techniques be best used at a regional level to prevent and control wildfires whilst balancing the needs of different land users? What evidence-gaps are there and how can they be filled?

Active, managed farmland is the most effective natural buffers against wildfire in England and Wales. The mechanisms through which farms reduce wildfire risk are well-established in practice, even where formal policy has been slow to recognise them.

¹ [Heather and Grass etc. Burning \(England\) \(Amendment\) R - Hansard - UK Parliament](#)

² [UK: wildfire area burned 2024| Statista](#)

³ [The Heather and Grass etc. Burning \(England\) \(Amendment\) Regulations 2025](#)

7. Grazing managements: Livestock grazing can stop dry, combustible vegetation from building up across uplands, heaths, and grasslands. Where grazing is reduced, vegetation ages and dries., potentially creating dense fuel loads that are very difficult to contain once ignited
8. Controlled burning: also referred to as prescribed burning or moorland/heath burning, involves deliberately setting fires on moorland to clear old heather and vegetation and reduce wildfire risk. Landowners must comply with strict legal requirements and codes of practice set by the government and outlined in local wildfire management plans.
9. Cutting and mechanical management: Cutting is an alternative to burning in some settings but carries its own limitations. Natural England's 2023 evidence review on vegetation cutting (NEER028)⁴ identified that little is known about its effects on peatland hydrology and ecology, and that it can cause peat compaction and damage to archaeological features. It must not be considered as a universal substitute for burning without a credible evidence base. Mechanical cutting is also limited by potential access difficulties – many areas of upland peat are inaccessible for the machinery required for mechanical management.
10. Track, firebreaks and water point maintenance: Working farms maintain tracks, field boundaries, access routes, and water infrastructure that perform critical firebreak and fire-response functions. These are often the decisive factor in whether a wildfire is contained or allowed to spread.
11. Farmer presence and early detection: In lowland settings, farm workers are present on the land daily, providing early warning and first-response capability. They provide detailed knowledge of the area that can be passed on to the Fire and Rescue Services (including access points, vegetation risk, water sources, boundaries, local machinery that can assist in suppression, community contacts, knowledge of public risk areas and infrastructure risk areas and hindering land topology).
12. Common graziers and shared management: Commons present a particular governance complexity for wildfire management. Where an agri-environment agreement is in place on a common, it must include all those with a legal interest, and irresponsible burning by any one party can result in Rural Payments Agency penalties being applied across all graziers.
13. Tenant Farmers: Tenants ability to manage vegetation on high-risk holdings is frequently constrained by landlord consent requirements under Farm Business Tenancy and Agricultural Holding Act arrangements, or by the landlord preferring to manage the vegetation themselves.

Regional variation and the need for tailored approaches

14. Wildfire risk and appropriate management responses vary significantly between regions and land types. The NFU recommends a risk-based, regionally differentiated management and response framework - informed by existing Land Classification data and that allows land managers to apply the most appropriate combination of techniques for their specific landscape context. Key regional settings to include:
 - a) Northern uplands (Pennines, North York Moors, Lake District, Peak District): High priority for vegetation management through a combination of grazing and rotational burning under license. High visitor pressures during warmer and drier conditions increase the potential for ignition sources.
 - b) Southwest uplands (Dartmoor, Exmoor, Bodmin): A mix of moorland and rough grazing land, with significant visitor footfall. Grazing management and firebreak maintenance are the primary tools; burning is more limited due to a higher proportion of common graziers but remains relevant in drier eastern moorland.

⁴ [NEER028 Edition 1 The Impacts of Vegetation Cutting on Peatlands and Heathlands - NEER028](#)

- c) Lowland Heather (Surrey, Hampshire, Dorset, Suffolk): High visitor pressure and proximity to residential areas create a distinctive risk profile. Grazing, cutting, and cool controlled burning are traditional wildfire risk mitigation activities.
- d) Lowland arable and fen (Fens, Somerset Levels and Moors, Cheshire Mosslands): Harvest period fire risk due to increased farm machinery temperatures and organic soil combustibility requires specific management responses. This includes crop residue management, firebreak creation, and water retention.

Evidence gaps and how to fill them

15. The NFU included our policy positions in our response to the government consultation on amendments to The Heather and Grass etc. Burning (England) Regulations:

Peatland restoration requires a mixture of interventions. The NFU is concerned that simply restricting burning will not deliver Defra's desired outcome to protect air, water, and wildlife, or rewet all peatland. The proposals outlined in the consultation will instead:

- Significantly increase the risk of wildfire in upland areas, putting people, livestock and the environment in danger.
- Undermine the sustainability and profitability of upland grazing livestock businesses by reducing productivity and threatening animal health and welfare.

The NFU asks the government to halt these proposals and address these important concerns before mandating a ban on burning.

In addressing these concerns, we ask the government to:

- Carry out a risk and impact assessment of these proposals on wildfire risk, food production, and upland farm business viability.
- Fund research into cool burning to understand its impacts on our environment and its importance in managing wildfire risk. Cool burning could be an alternative to the burning ban proposed in this consultation.
- Assess all moorland in England as to its potential for rewetting and becoming a fully functioning bog.
- Ensure that there is adequate government funding for national roles in wildfire prevention that will support national wildfire preparedness.

If the government proceeds with the proposals, despite NFU concerns, it must ensure that:

- Accredited training courses are only mandatory for supervisory practitioners of burns. This is subject to access and availability of training.
- There is a review of the regulations in three years' time to assess whether the proposals have resulted in a further increase in wildfires.
- Cool burns can be carried out without the need for a licence.
- Research burning licences are only granted when there is obtained consent from the farmer/land manager/landowner and an impact assessment.

What role do nature-based solutions, such as improving biodiversity and more resilient landscapes, have in the prevention and control of wildfires?

16. The NFU broadly supports the principle that healthy, functioning, biodiverse landscapes can be more resilient to wildfire than degraded ones. Wet, structurally diverse ecosystems are inherently less combustible than dry, homogenous, degraded habitats. However, it must be acknowledged that many farmers hold a deep-seated distrust of nature-based initiatives, viewing them as a threat to cultural heritage, land ownership, and food production.
17. The NFU makes two critical qualifications. First, nature-based solutions require time to deliver meaningful wildfire resilience benefits. In the interim, the landscapes most in need of nature-based restoration are typically those that carry the highest wildfire risk. Management tools that actively reduce fuel loads in the short terms must not be removed based on long-term restoration

plans that have yet to be delivered. Second, nature-based solutions are most effective when they are co-designed and delivered through active farming and land management businesses. Approaches that bypass farming communities risk creating landscapes that are less managed, less resilient, and more combustible in practice.

Peatland Restoration

18. Where rewetting is hydrologically feasible, rewetted, and healthy blanket bog can be more resistant to wildfire than degraded or drained peatland. A wet peat surface acts as a natural firebreak. The high moisture content of Sphagnum moss and other bog vegetation suppresses ignition and limits fire spread. The NFU recognises peatland restoration as a long-term objective and acknowledges the carbon, biodiversity, and water quality benefits it co-delivers. However, a considerable proportion of England's moorland will never rewet into fully functioning bog. Much of it sits on permeable substratum, meaning that water tables are not high enough for Sphagnum moss to be a dominant component. Rewetting cannot, therefore, be treated as a universal solution to wildfire risk and should not be used to justify the removal of active management tools before realistic alternatives are in place.

How best can Defra funding schemes be used to support land managers to adapt to the increased risk of wildfires?

The current funding landscape

19. The NFU acknowledges that the ELM schemes could in principle provide a route of rewarding wildfire-risk-reduction activities. However, given the current ELM budget pressures and the speed at which wildfire risk is escalating, the NFU does not consider it realistic to route wildfire prevention funding solely through ELM schemes in the near term. Further consideration is required for the management of fuel load in upland areas – particularly when deciding grazing levels.

The current state of wildfire monitoring in England and Wales

20. The NFU's view is that wildfire monitoring in England and Wales is fragmented and significantly below the standard required to underpin evidence-based policy. This means that fundamental questions such as whether the incidence and severity of wildfires is higher on managed or unmanaged land, whether controlled burning reduces the risk on subsequent wildfire or, what proportion of wildfire events originate from specific cause categories cannot be answered from available data with any confidence.
21. This monitoring gap has direct policy consequences. When the UK Government decided to extend the burning restrictions under 2025 Amendment Regulations, it did so without being able to draw on evidence on the relationship between burning management and wildfire incidence. As Natural England itself acknowledged in its evidence review: 'Evidence on the relationship between burning and wildfire in the UK context is limited, though out-of-control managed burns are a cause of wildfire⁵.'
22. Geographical bias: The majority of studies underpinning Natural England's evidence base is drawn from a small number of long-term experimental sites in Northern England, particularly the Northern Pennines. NEER004 (2013) characterised the evidence base on several key questions as weak to moderate; the 2025 update (NEER155) draws on an expanded body of studies, but gaps remain - notably on wildfire behaviour, fuel load dynamics, and conditions outside upland blanket bog. There is an absence of robust data from the South West of England and lowland settings which may experience materially different outcomes from burning under different soil

⁵ [An evidence review update on the effects of managed burning on upland peatland biodiversity, carbon and water - NEER155](#)

types, rainfall patterns, and vegetation communities. National policy cannot be credibly derived from a geographically restricted evidence base.

23. Short study timescales: Many of the studies cited by Natural England are short-term and do not span full peatland recovery or burning rotation cycles, which would typically run between 15 and 25 years. Long-term, multi rotational field data is rare, with the Hard Hill experiment ⁶ being the notable exception. Evidence from studies shorter than one full rotation cannot be used to draw reliable conclusions about the cumulative effects of rotational cool burning on peat condition.
24. Absence of evidence on cool controlled burning specifically: The NE evidence review acknowledged that it was unable to assess the specific effects of controlled cool burning as distinct from burning more generally. Yet the regulatory regime treats all upland burning as equivalent.

What improved monitoring should look like

25. The NFU recommends that a National Wildfire Monitoring Framework be established, covering the following elements:
 - a) Standardised incident reporting: All Fire and Rescue Services should be required to record wildfire incidents using common national taxonomy that captures location, area burned, habitat type, vegetation type, probable cause category, proximity to infrastructure and suppression resource requirements. This data should be reported to a national body – which could be the National Fire Chiefs Council (NFCC), the Environment Agency, or a new Wildfire Unit within Defra – and should be published annually.
 - b) Satellite and remote sensing integration: Satellite-derived burned area data should be systematically integrated with the national incident dataset. The UK Centre for Ecology and Hydrology and the Met Office already have relevant capabilities. These should be formally linked to the monitoring framework and the results used to reflect realities from Fire and Rescue Service incident reports, particularly for remote and hard to access locations.
 - c) Economic impact tracking: A systematic process for recording the economic costs of wildfire events. This should include agricultural losses, infrastructure damage, suppression costs, ecological recovery costs – and should be established and reported annually.

International examples and best practice

26. There are several international models that the UK could usefully draw from:
 - a) European Forest Fire Information System (EFFIS)⁷: The EU's EFFIS provides a pan-European platform for wildfire monitoring. Integrating satellite data, national incident records, and weather data to provide near real-time situational awareness and long-run trend analysis. England and Wales currently contribute incident data to EFFIS but do not make systematic use of the platform's analytical capabilities. Greater integration with EFFIS, including participation in its standardised reporting protocols, would significantly enhance England and Wales's monitoring capacity at minimal costs.
 - b) Scotland's Wildfire Monitoring Framework⁸: Scotland has made progress in developing a more integrated approach to wildfire monitoring through the Scottish Wildfire Forum, which coordinates data collection between the Scottish Fire and Rescue Services, NatureScot, Forestry and Land Scotland and land managers. The Scottish model of multi-agency data sharing should be adopted in England and Wales.
 - c) Australia's fire danger rating system⁹: Australia adopts a nationally standardised Fire Danger Rating System that integrates weather forecasting, fuel moisture modelling, and topographic data to produce daily fire danger ratings at landscape scale. The UK Met Office already produce Daily Wildfire Assessments through use of the Fire Severity Index, but these are not

⁶ <https://www.ecologicalcontinuitytrust.org/moor-house>

⁷ [EFFIS - Welcome to EFFIS](#)

⁸ [Home | Scottish Wildfire Forum](#)

⁹ [AFDRS – Australian Fire Danger Rating System](#)

used systematically by land managers or integrated into national warning communications in the way that the Australian system achieves.

- d) Republic of Ireland¹⁰: The Republic of Ireland's upland burning framework provides a model of how prescribed burning can be regulated proportionately without the barriers that characterise the current English licensing regime. Ireland distinguishes between managed low intensity burns and uncontrolled fires in its data collection, producing a more accurate national picture of fire cause and management outcome than England currently achieves. The NFU recommends that Defra commission a formal comparative study of the Irish model as part of the development of a future England's National Wildfire Strategy.

What resources and training do emergency services and local authorities need to respond to the increasing number of wildfires, particularly in rural and hard-to-reach areas?

- 27. The 2025 fire season placed unprecedented demands on Fire and Rescue Services across England and Wales as quoted by the National Fire Chiefs Council¹¹. Particularly in rural and upland areas where fires can cover vast areas of difficult terrain, access is limited and water supplies are absent or sparse. The Langdale and Fylingdales Moor wildfire on the North York Moors in 2025 illustrates the scale of the resourcing challenge that major wildfire events can create. North Yorkshire Fire and Rescue Services needed sustained deployment over multiple days across remote terrain with limited vehicle access and no mains water supply. Fire and Rescue Services in England are funded and primarily trained for structural firefighting in urban and suburban environments. Their capacity to respond to sustained and large area wildfires in remote rural landscapes is limited. Specialist wildfire training, appropriate equipment, such as adaptors to use on farm water bowsers, and the inter-service coordination protocols needed for major incidents have not been developed at the scale the growing threat requires.
- 28. In most rural wildfire events, farmers and land managers are the de facto first responders. They are on site before Fire and Rescue Services arrive. They possess the local geographic knowledge to navigate difficult terrain. They have access to heavy plant, agricultural water bowsers, and tracks that emergency services cannot use due to the nature of the terrain, and they understand the behaviour of fire in their landscape. The Langdale and Fylingdales Moor fire proved this. Local farmers and gamekeepers provided immediate on the ground response, using agricultural vehicles and local knowledge of the moorland tracks to support Fire and Rescue crews who were unfamiliar with this terrain. By working with the farming community, Fire and Rescue services can better understand and identify the risks in response.

Specific resource and training needs

- 29. The NFU identifies the following specific requirements for an improved rural wildfire response capability:
 - a) Joint farmer and Fire and Rescue Service protocols: Farmers and land managers have the local and specific knowledge of the land. They should be consulted on by the Fire and Rescue Service during ongoing events to ensure this knowledge is best utilised to stop the further spread of fire. Building on this collaboration can create better working practices in dangerous situations as seen in Dartmoor with common graziers often attending training to support the expansion of the Fire and Rescue Services knowledge.
 - b) Legal clarity for farmer first responders: Defra and Ministry of Housing Communities and Local Government (MHCLG) should jointly produce guidance clarifying the liability position of farmers who prevent wildfire spread on land they manage or adjacent land. The current uncertainty deters some farmers from acting promptly, with potentially profound consequences.
 - c) Wildfire Specific training for Fire and Rescue Services: All Fire and Rescue Services operating in rural and upland areas should be required to deliver wildfire specific training. This should cover fire behaviour in vegetation, safe approach and withdrawal tactics in open landscape,

¹⁰ [Draft Prescribed Burning Code of Practice](#)

¹¹ [Record numbers of wildfires are putting services under huge strain, warn Fire Chiefs - NFCC](#)

and the use of ground-based fire beating and water application equipment appropriate of rural terrain.

- d) Specialist wildfire units: Considerations should be given to creation of regional specialist wildfire units, potentially modelled on Scotland's Rural and Wildlife teams, with dedicated equipment and trained personnel able to deploy rapidly to major incidents across a region.
- e) Local authority wildfire planning: All local authorities in high-risk areas should be required to include wildfire as a specific risk within their Local Resilience Forum planning. Dedicated plans covering access routes, water supply mapping, evacuation procedures, and community communication should be incorporated. Rural communities should be formally consulted in the development of these plans.

What are the most effective activities for tackling the human causes of wildfire ignition, for example public engagement and campaigns? How can the UK Government best support the delivery of these activities at both a local and national scale?

- 30. Almost all wildfires in the UK are caused by human activity¹². Unlike most other countries where lightning is a significant factor, UK Fire and Rescue Services only attend a handful of lightning-caused wildfires. The NFU understands that the primary human ignition sources in England are deliberate fire-setting (arson); carelessly discarded cigarettes and barbecue embers; campfire and disposable barbecue use by recreational visitors to open countryside; agricultural machinery during harvesting and prolonged dry periods; and fires escaping from garden bonfires, particularly at the rural-urban interface.
- 31. The NFU acknowledges that the UK-specific evidence base for effective wildfire public engagement remains limited. There are few published outcome evaluations of UK wildfire awareness campaigns that demonstrate measurable or sustained behavioural change, a gap that POSTnote 700 (April 2024)¹³ explicitly confirms. The NFU therefore recommends that any future national wildfire awareness programme includes a mandatory evaluation component from the outset, ensuring that the UK builds its own evidence base rather than continuing to rely on what can be inferred from international contexts.

What policies are in place, or are needed, to reduce the severity of wildfires and their socio-economic impacts on both agricultural land and at rural-urban boundaries?

- 32. England does not currently have a comprehensive or coherent national wildfire policy framework. Relevant policy is fragmented across multiple instruments, and no single body holds strategic responsibility for wildfire prevention and resilience at the national level.
- 33. The policy instruments most directly relevant to wildfire are:
 - a) The Heather and Grass etc. Burning (England) (Amendment) Regulations 2025: As mentioned under ToR1, these regulations extend burning restrictions without an adequate impact assessment of wildfire risk.
 - b) The National Planning Policy Framework (NPPF): While Climate Change Risk Assessment 3 (CCRA3) requires wildfire and climate-risk mitigation to be considered, the NPPF should explicitly recognise these proposals as circumstances where proportionate, solution-focussed decision making must apply. Agricultural buildings are often found next to areas identified in CCRA3 as having heightened wildfire risk. Proposals to include fire resilient measures should not lead to disproportionate planning requirements, and modest layout changes to reduce fire spread should be supported.

¹² [Wildfires: Nature's role in resisting the spark – Natural England](#)

¹³ [Wildfire risks to UK landscapes - POST](#)

Given that responsibility is spread across government departments and bodies (e.g. Defra, Forestry Commission, Ministry of Housing Communities and Local Government), how should the Government coordinate a cross-departmental approach to tackle the increasing risk of wildfires?

34. The NFU considers the fragmented governance of wildfire risk in England and Wales to be a significant weakness in the current policy landscape. Wildfire is a cross-cutting risk that demands a multi-agency response.
35. The NFU recommends that the UK Government commits to developing and publishing a National Wildfire Strategy for England and Wales. This strategy should:
 - a) Set clear national standards for wildfire prevention, preparedness, and response. This needs to apply to all relevant bodies including the Fire and Rescue Services, local authorities, Natural England, the Forestry Commission and Highways England.
 - b) Be subject to formal annual review by the EFRA Committee, taking evidence from across the relevant departments and bodies.

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