Written evidence submitted anonymously (CWR0244)

I. In my experience as an upland land manager over the last decade (involving some 100,000acres), I have seen concerning changes in attitudes towards wildfire management and the means to deliver it. Although I have completed EWW Forum Wildfire training, assisted in the drafting of wildfire plans, responded to wildfires and seen firsthand how other countries (III) approach the topic. I don't consider myself an expert in fire modelling or behaviour but provide responses based on embedded knowledge of land management and the communities involved.

II. The overwhelming evidence available globally (Civil Protection Knowledge Network CPKN) and nationally means this consultation is not a question of 'what could we do' but 'what should this government have already achieved?'. Instead, we have cross-government departments treading on each other's toes, avoidance of responsibility, regulation creating unintended impacts on wildfire risk. No single body in the UK is granted both responsibility and the exclusive means to deliver wildfire management. In the current legislative landscape if a single organisation were granted authority, it would be restricted by many pieces of conflicting regulation. Wildfire management has, to date, been inevitably ineffective due to diverging motivations from different NGOs. This supports the UK's need for primary legislation with wildfire actions/processes included, something over half of G20 countries already have.

III. Where practices compliment wildfire management, value should be acknowledged. The potential costs of replacing these process considered - if the social or economic framework that supports them is undermined. Historic grazing of Segureña sheep in Sierra Segura and Morrena show wildfire benefits through multiple studies (CPKN). They follow, mainly on foot, the seasonal greening of grass at different altitudes preventing dead litter being left behind. But what is more important to government strategy is the culture that surrounds them. The transhumant nature of the process means that there is a symbiotic and self-sufficient relationship with shepherds and their herds. For this reason the herds include sheep, goats, and cows which breakdown different structures of vegetation. The 100km route has been covered for nearly 2,500 years meaning that most current settlements in the area naturally fit around the system and the seasonal environmental risks it controls. A short review of placenames in the UK will uncover that a large proportion have grazing based meanings hidden in norse or celtic naming conventions. The Segurena's route has been offered statutory protection since 1273 and in more recent times their products awarded geographic distinction and national recognition in compliance with Spain's UNESCO participation. Despite that, the number of herds, shepherds and herd sizes are declining. This is due to an erosion of modern pressures and the fact that very little was understood about the role women have played in maintaining the culture over thousands of years. The length of the migration is unusual in that

it means women would need to perform lifecycle events whilst also moving large distances and altitudes. Because of this women are pivotal in transferring knowledge and skills in a fashion not possible where spouses do not share occupation. In a culture reliant on co-ownership, male bias introduced by early legal ownership structures was a fundamental issue in incentivizing the required multigenerational structures. In 2011 Spain introduced specific legislation on co-ownership to address this. It is easy to see how this cultural system could be extinguished by changes in society or unintended impacts of legislation which bare no relevance to sheep farming or wildfire.

IV. Whilst in Andalucía we observed the donana national park was disproportionately unaffected by wildfire. The landscape allowed ancient transit from the coast to the plains of Seville. It features avenues of tall shaded trees, wet marshes, breaks in vegetation type and seasonality created by a history of grazing and burning. Biodiversity supported by comparatively recent medieval Spanish royals for hunting purposes. Reliant on traditional human occupation and stewardship which provides intangible wildfire management benefits. Management by controlled burning has been reinstated and studies (Romero-Toribio et al) show ecological impacts of prescription burning in the park are short lived and unlikely to affect long term ecological performance. Comparatively we spent two days avoiding a fire south of Jerez which left the city of Cadiz without power 6/08/23. A lasting impression was seeing a resident elderly couple pouring bottled water on the ground around their property while a convoy of helicopters took seawater to the front over their heads. Before temperatures rose the following day we exited the peninsula. Balancing a decision between running out of fuel by following detours or standing over a fuel tank temporarily. We elected to stop at a respol just off the E5. Whilst I refuelled the attendant sprayed the forecourt using the car wash lance. He pointed at smoke rising about 500m away in the scrub. We didn't see plumes of smoke again until being on the other side of donana, in Huelva. The value of collective culture is normally most visible in response to wildfire whether bottle, car wash, or helicopter but is easy to ignore or unintentionally disrupt when it comes to preventative measures over time.

V. Reactions to environmental risks are often deep routed in cultural practices. Listed specifically as grounds for UNESCO Intangible Cultural Heritage (ICH) designation. Comparisons to avalanche risk management are relevant. Methods change over years and by geography but without protecting the cultural asset the outcome would be very different. One outcome of the designation was to raise awareness, in itself a mitigation of avalanche impact.

VI. Technology can be used to manage ongoing situations. Reducing impact after a fire has started. Andalucía's wildfire watch app provides semi-live information about active fire fronts but we found more appropriate for onlookers than those

directly affected. Remote detection was a useful and an appropriate technology in Spain but has less application in the UK where land managers are present across most land as an existing detection, mitigation and response resource.

VII. Nature-based solutions can be used but not relied on independently and focus should be on significance. For example, recent fires in the North York Moors were severe enough that they could have caused multiple fatalities. This example was brought into regulator's discussions about future controlled burning licences - as to whether some very small re-wetted areas didn't burn. 2025 licencing to burn assessments suggested that applicants must evidence that re-wetting has taken place before fuel load could be permitted to be managed under a licence. Re-wetting **did not:**

- reduce the severity of the fire
- prevent ignition
- prevent unexploded ordinance being detonated
- prevent the risk associated with required operational activity (felling trees, digging trenches etc).
- limit the fuel load
- prevent the risks to human health
- reduce the cost of response

There was nothing within the evidence that suggested that re-wetting needs to be considered in isolation as the only wildfire management tool. Science contradicts that broadcast re-wetting is possible or the best solution ecologically. It is plain to anyone that any measure to reduce risk that can be implemented should be implemented not deferred. Yet the current regulatory processes are more interested in demonstrating that one activity is wrong than they are in ensuring outcomes are effective.

VIII. Scientific experiments into nature-based solutions and broader modelling work are useful to progress understanding but their limitations should be understood for decision making processes. Models and experiments ignore principles of responsibility. Evidence gaps will always appear. Regulatory processes need to be tolerant to missing or conflicting evidence. For example, a recent publication (DEFRA Sept 2025) suggested that DEFRA's decision to 'ban' controlled burning was based partially on the fact that 'Burning on peatland releases harmful smoke ruining local air quality'. It is scientifically undisputable that smoke reduces air quality. Statistically it is likely that controlled burning produces smoke. However, this is not a relevant and proportional basis of decision on controlled burning as a wildfire management tool. Proportionally wildfire (Winter Hill, Saddleworth, and NYM) poses a much larger and far reaching health risk. Wildfires which burn into peat release a legacy of bioaccumulated pollutants such as heavy metals whereas prescribed cool burns do not burn into the peat. Stamford University

showed that prescribed burning reduces the severity of wildfires by 16% and in those fires, reduces pollution by 14%. Evidence from peat cores taken by York University show that evidence of fire is visible in peat layers spanning thousands of years. Whether these are wildfires or human ignited is irrelevant, as it shows that smoke is inevitable. Whereas Yale University has shown evidence that controlled burning has been used by humans as a form of eco-engineering for up to 92,000 years. Continued practices of controlled burning over such a long time demonstrates the benefits controlled burning has to humans must outweigh the shorter-term impacts. It shows that controlled burns are unlikely to be significant contributors to climate change - within this time frame the earth cooled to Last Glacial Maximum and experienced what is accepted as being the most climatically stable interglacial period. DEFRA continues to suggest that smoke and GHG fluxes from controlled burns support their limitation of controlled burning, despite being shown contradictory long-term data and the evidence in other countries. This has the logical equivalence of suggesting New Zealand lost the rugby world cup in 2023 because they are likely to wear black shirts, as statistically inevitable as smoke. Or because they won their quarter and semi-finals. Both are correlations with no causality. Even if causality might be proved, it would be obvious to anyone that these factors would be relatively insignificant to the fact they scored less points than their opponents in the final. The three facts don't need to be disputed in isolation, existential debate is not required and is a waste of public money. It demonstrates DEFRA have no interest in significantly reducing wildfire risk because our legislative landscape allows it not to.

IX. Further to the above points on scientific approach. It is accepted that robust process and scientific rigger should be applied to expanding the evidence basis on wildfire. This should be a collaborative process designed in at a structural level.

X. The context of ecosystems, climate adaptation and human behaviour spans a much longer timeframe than modern scientific process. The issues surrounding fuel load, performance of re-wetting, changing vegetation dynamics will not be concluded with any degree of certainty within the timeframe that decisions on wildfire policy need to be made. It is therefore not an acceptable approach to wait for modern scientific process to catch up with 1000s of years of human behavioural knowledge or for scientific experiment to be conclusive in absolute measure. Other countries have already accepted this and Australia is set to invest $2.3million into indigenous fire management. Delivering high value for money when you consider the $2 billion outlined in the National Bushfire Recovery Fund. Other countries are following this pattern with Canada looking to invest an initial $100m per year scaling to $300m per year in indigenous ecosystem solutions.

XI. A justification for providing indigenous groups the means to manage wildfire is that they are disproportionately effected by it. In Canada over 42% of evacuation in the last 40 years have been indigenous groups. Their displacement can have long lasting economic and social consequences. Over 90% of smoke related evacuations were in settlements where indigenous communities represented over half the population. In Australia 10% of children affected by the 2020 fires were indigenous despite having only a 2.3% representation in the national population. People dependant on land for their livelihoods, community and culture are disproportionately effected by wildfire.

XII. The consultation references the frequency of fires occurring in built up areas. This is a poor indicator of the issue or the performance of attempts to manage risk. There is sense in prioritising the defence of infrastructure and large settlements. Exactly the reason land managers should represented at decision making level, to facilitate societal benefit. But what will government be doing to make sure that the groups most effected by wildfire are not under-represented and disproportionately effected in this process of reviewing national strategy? A standalone committee is insufficient in delivering that end.

XIII. In recent years in the UK we have watched individual fires consume 20 or more square km, taking more than 20,000 man hours each to extinguish over more than a month at a time. These fires are taking place repeatedly with no change in strategy from government. Will NGOs continue their inaction until there is a fatality from a UK wildfire? Or until the wildfire policy can win votes in more populated areas? In 2018 over 100 people died in Greece's Attica fires. The Attica fires were approximately 25% of the size of just one of the 66 fires that took place in the same year in the UK.

XIV. In the 8 years since these events Greece has redesigned its approach to wildfire. Between 2018 and 2021 they focused on warning systems, evacuation technology and fire fighting response. In 2021 after considerably larger fires (50,000ha) Greece accepted that and they had neglected prevention in their plan. They immediately resourced 25 million euro of fuel load management. They accepted that their Ministry for the Environment had been ineffective when it came to fuel load and delegated powers to the Ministry for Climate Crisis and Civil Protection. Who, unincumbered by the local influence and ineffectiveness of NGOs cleared 8,000ha of fuel load, built 17km of new tracks, and 1,600 kilometres of fire breaks (ANTI-NERO plan) within months. They changed their response system to allow early deployment with an 'attack' model to extinguish small fires. In 2024 Attica was struck by extreme wildfires again over a larger area than in 2018, 1 person died.

XV. From the global picture this committee could conclude that preventing wildfire or preventing loss of life from climate crisis are unachievable goals. However, no matter where you look for case studies the following are significant:

- Wildfire management relies on Response and Prevention. There is no suggestion their merit or weighting should be compared.
- No other country has concluded that the principles of fuel load management should be deferred to a later date or after other practices have been trialled. Evidence in Greece suggests the opposite.
- Reality of wildfires exposes unpredictable events that cannot be modelled.
- After events, most countries conclude that delegated power and responsibility needs to be central with clear structure.
- In Greece, Australia, Canada and US the cost of implementing prevention is a small proportion of the cost of response or damage. Prevention measures will reduce the cost of response longer term even where they do not reduce risk to 0.
- Australia, Spain, Canada have been able to demonstrate the value of existing management or traditional activities which contribute positively to wildfire management.

XVI. Comparatively since 2018 DEFRA and our government has responded in the following way:

- 2 statutory instruments to prevent the effective reduction of fuel load
- Allowing land-owners to recklessly increase moorland fuel load. Even where that same land-owner has hosted multiple wildfires.
- Proposed closure of rural fire stations (most recently in Dorset & Wiltshire)
- Introduced a reduced stocking rate expectation on new agri-environment schemes. NE advisors pursuing stocking rates below viable rates for hefting to continue without any assessment against fire risk short or long term.
- Recklessly withdrawn financial support for some of the most vulnerable and influential upland land managers.
- Had the opportunity to review the countryside code (2025) and chose to provide instructions on how to have BBQs even though they are already not permitted on any form of public right of way or open access land.
- Advised its staff not to put out fires and to evacuate carelessly if over 50cm flame length. This advice omitted most of the relevant responses to wildfire, such as understanding being ‘in the black’.
- Introduced regulatory uncertainty to upland communities who can deliver management and response. Creating risks around a lack of skills, presence, community and replacing a culture of stewardship with a ‘passing through’ mentality.
- Prevented the implementation of agreed and licenced wildfire management plans by delaying site consent or providing unusable terms.
- Reduced funding to rural communities, even those affected by high volumes of outside visitors such as the lake district where local authorities (Westmorland) have had budgets slashed by up to a third.

- Introduced taxes which encourage land owners and farmers to carry less assets. Meaning equipment which would deliver more public good than day to day business benefits is unlikely to be kept. Restrictions on burning mean that some managers are now likely to get rid of their equipment if they think it won't be used annually for controlled burning.

XVII. *In light of overwhelming global evidence to expedite fuel load management; to utilise and support those communities under-represented democratically and disproportionately affected by wildfire; to prepare fast cohesive and well drilled emergency response; and, of course, to accept reality does not follow models. When will this government and its delegated authorities stop their frequent and nameless maladministration; drop their policies of oikophobia; and abandon their 'leave them where they lie' attitudes to rural communities? DEFRA have proven themselves ineffective, legislation has proven itself contradictory. Primary legislation should appoint a central body with clear responsibilities unburdened by NGO ineffectiveness. This instrument needs to be unburdened by the current statutory need to devoid itself from compelling reality for the sake of isolated scientific experiment or unrationalised micro-ecological justifications. This body should have appropriate representation that extends widely, allowing for efficient transmission of public money into management outcomes supported by a range of partners in key emergency services and beyond the public sector. Above all else it should appoint clear accountability vertically, the chain of command and integrity we would expect from our civil protection services (fire, police, defence) and not the platitudinal 'flatarchies' of whitehall working groups who's lanyards transmit little but meaningless job titles and a self-appointed power to obfuscate.*

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