

## **WILDFIRES IN NI – DRAFT STRATEGIC WAY FORWARD**

### **Consultation response from Ulster Wildlife**

Ulster Wildlife welcomes the consultation on wildfire in Northern Ireland. Wildfires pose a big risk to some of our most fragile habitats and species, damaging or destroying vegetation, wildlife and soil structure and releasing carbon and other pollutants into the atmosphere, thereby contributing to climate change.

### **CONSULTATION QUESTIONS**

#### **Do you agree with the 5 Strategic Goals?**

The 5 Strategic Goals are a solid core around which to build the strategic way forward. One area we feel needs to be included as a goal rather than simply in the themes is around monitoring and evidence. It should be a goal to build a broad body of evidence and support research and monitoring on which to inform policy and guidance. We realise that this then feeds into the other goals but still believe it merits its own specific goal.

We feel that it would be helpful to include a goal around changing attitudes to wildfires to make it much more socially unacceptable

#### **Do you have any comments to make in relation to the 5 Strategic Goals?**

The goals are very general and lack sufficient detail, therefore it is more difficult to provide specific comments. The first Strategic Goal for example could at least be better defined as 'to significantly reduce the number and scale of wildfires'.

The second Strategic Goal could include a reference to climate.

#### **Do you agree with the 6 Strategic Themes?**

Yes

#### **Do you have any comments to make in relation to the 6 Strategic Themes?**

Yes

Also see our comments under 'Recommendations for Action'

#### **Land Management**

While this is a complicated and sometimes controversial area in relation to wildfires, the points underlying this section could be expanded. While it is true that a balance may need to be struck between conservation features, agricultural productivity and wildfire, there are many instances where this is simply going to be impossible to achieve. Making concessions in one area may significantly hinder the prospects in another. Rather than having landscapes that are thriving, they are simply hamstrung as a matter of caution or otherwise. We may manage areas to prevent wildfire but that may mean that certain species will never be able to persist or expand.

It seems noticeable by its absence that land management practices that are becoming increasingly more common including peatland restoration and afforestation are not noted here. The widespread coniferous plantations in the uplands are a significant factor in the context of wildfire and peatland restoration and the planting of broadleaved trees in upland settings is going to be a major factor in the resilience of landscapes to wildfire going forward.

Maybe there is a need for more integration between key stakeholders in these fields when it comes to developing guidance, advice, policy etc.

Protected landscapes and habitats would be less susceptible to burning if they were in favourable condition, for example through the re-wetting of bog land and peatland soils through restoration.

### **Do you agree with the Recommendations for Action?**

While many of the recommendations for action are admirable and great steps forward there is still room for expansion and additions. While actions around evidence and research are included there is a need to expand beyond assessing the gaps and needs. Actions should be outlining how research and monitoring will be funded, and will be constantly used to inform guidance, advice and policy. These goals may be an initial effort but this strategic way forward should be all encompassing even at this stage.

Again on the whole the recommendations are all admirable but at this level actions may be more useful if they are more detailed. For example, under “Response” the actions for “Develop Interagency Response” is very broad. There is much experience and knowledge amongst the strategic and stakeholder groups to have more specific goals around this overarching aim. For example, investigating and developing mechanisms for shared use of wildfire and land management resources, investigating frameworks, and policy for insurance, liability and responsibility in relation to shared wildfire resource and response, developing communication channels amongst land managers and responders etc.

### **Do you have any comments to make in relation to the Recommendations for Action?**

We have highlighted particular points within the recommendations for action here and made comment on them specifically.

#### Governance

- As it stands the stakeholder forum appears more of a traditional forum rather than a proactive group driving the development of action plans on the ground so to speak. Is this the aim or is there some rejigging of wording and framework here?
- Does the wildfire stakeholder group “oversee” the local groups or simply provide a forum for them all to coalesce?
- How will the strategic action plan translate to action on the ground? We assume it will provide a basis for the drawdown of funding but is there more detail at this stage?

#### Engagement

- Possible this could be expanded on to say that methods of issuing alerts will be explored. How do they get sent out and to who? Maybe the reach needs to be significantly expanded.
- We realise that points 6 and 7 are purposefully broad but again we think there needs to be specific mention of the agricultural community here. Engagement with CAFRE, AFBI, UFU, NIAPA, EFS Groups etc.

#### Land Management

- What about trialling management techniques? Assessing impacts and informing points 11 and 12. This could be included in the evidence section or here.

- There should be an action that highlights how research, monitoring and evidence will be continuously used to redesign and reform advice, guidance and management rather than relying on “traditional” management
- One key action should be to investigate and develop a framework for prioritising actions on the ground based on variables such as priority habitats and species, agricultural productivity, and wildfire risk. This can help land managers steer management at a site level.
- Wildfire resilience could be built into new afforestation schemes. Consideration of different types of firebreaks could provide an opportunity to increase connectivity for nature and to provide habitats such as open water ponds and swathes of species-rich grassland within and between blocks of woodland. Deciduous trees are less susceptible than conifers to wildfires and at urban/rural interfaces, they are a better option.

### Response

- A shared wildfire resource list for NI is great but development of a mechanism and process for utilising and operating it has to be included. There is much that needs ironed out on this front re insurance, liability, storage, transport, training etc. It should be a recommended action to develop these aspects of a shared resource.

### Policy, Legislation and Enforcement

- It would be useful to examine how legislation in other jurisdictions has reduced the incidence of wildfires. Comparison should be made with the Republic of Ireland to determine if its legislation and agricultural requirements and restrictions have reduced the number and severity of wildfires in recent years.
- The sale and use of ‘sky lanterns’ should be illegal. Not only do they pose a high risk for wildfire, but can injure and kill livestock that consume the components.

### Evidence

- There is a need to identify and administer funding to carry out research, monitoring and trials. The monitoring and works on Slieve Donard following the 2021 fire were very useful but much more is needed and actions should be clear here to push that forward rather than simply identifying evidence needs.
- It would be useful to include here that the wildfire stakeholder forum should be responsible for driving, overseeing, updating and reviewing evidence and monitoring projects.
- Much effort is needed here to look at novel management and not just “traditional management”. This could include funding and space to investigate and monitor the impacts of different grazing regimes, GPS collars, tree planting, choice of tree species, rewilding, riparian restoration, peatland restoration etc.

### Further comments

Paragraph 1.2 states that the current wildfire problem is purely the result of human activity. We welcome that this has been included. It goes on to state that wildfires are preventable if everyone is vigilant to the risks of wildfire. This implies that most wildfires are the result of accidental ignition. While this may be the case in busy recreational and tourist areas, it is not likely to be the root cause of wildfires in the wider countryside or less visited forest and peatland areas. We feel that it would be a very useful exercise to research the likely cause of ignition of wildfires, which will in turn determine what other actions will need to be taken, for example, changing mindsets and culture to make lighting of wildfires more socially unacceptable.

Paragraph 1.3 identifies that the threat of wildfires may increase as a consequence of climate change and paragraph 1.5 reports on the financial cost of damage as a direct result of wildfire. Wildfires in themselves cause the release of carbon dioxide and other pollutants from burning vegetation and peatland soils, contributing adversely to climate change. Damaged peatland soils are unable to sequester carbon, so not only does it emit carbon dioxide, but is unable to capture it to its full potential. This also has a financial cost and reduces the ability of government to meet its climate change targets. Bare, exposed soil allows water to run off more quickly, leading to increased flooding and the deposition of silt into nearby watercourses.

Paragraph 1.5 could also include figures from other years, particularly 2017, to demonstrate that this is a persistent and ongoing problem.

Paragraph 1.6 should include reference to the loss of priority species such as common lizard and during the wildfires of 2017, Sliabh Beagh hen harrier nests were significantly disturbed or destroyed as a result. This bird is one of our most highly protected and rare birds of prey.