



**Northern Ireland Environment Agency consultation on
reducing wildfires in the countryside**

**Response to consultation from Mountaineering Ireland
April 2018**

Introduction

As the representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland gains benefit from and has an interest in the management of mountain, hill and coastal land, much of which is susceptible to burning. Fire can be devastating, destroying habitat and thereby diminishing the quality of the recreation experiences that people enjoy.

Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both Sport Ireland and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 12,500 members, comprising 184 clubs and approximately 1570 individual members (December 2017).

Mountaineering Ireland welcomes NIEA's initiative in undertaking this consultation and we advocate that a strategic approach is taken to reduce the number of deliberate fires in the countryside. While there is need to ensure capacity to tackle fires, Mountaineering Ireland believes that initiatives to address this problem should be focused on the underlying causes of human-caused ignitions.

There is need to change how mountain, hill and coastal lands are viewed and described, with an emphasis on valuing these habitats and the ecosystem services they provide, and rewarding landowners for good practice more than penalising poor practice.

Question 4 - What do you think are the causes of wildfires in NI? Do you know any reason why fires in the countryside are being started deliberately or maliciously?

Mountaineering Ireland is concerned at the number, and extent of, uncontrolled fires in upland areas in recent years, it appears that much of the burning is done to meet the usual eligibility rules for the Basic Payment Scheme. Burning is a traditional land management technique, and used by some hillfarmers to stimulate the growth of new vegetation for grazing by livestock, particularly sheep. Many of these fires are unmanaged, due to lack of skill or labour and a proportion of the fires get out of control causing widespread damage.

The apparent conflict between agricultural policy and environmental policy should be addressed. Land eligibility rules should be examined from an ecological perspective to ensure there is not an incentive to destroy areas of environmental value. For example DAERA's 2017 Guide to Land Eligibility* highlights burning as evidence of agricultural activity, and accepts burning of up to 20% of a heather area as controlled burning.

A small number of fires may relate to pranks, and it is possible that some of these are inspired by the publicity that has surrounded hill fires in recent years. Mountaineering Ireland is concerned that in some places the incidence of fire has been attributed to recreational activity such as hillwalking, but without any evidence to support this - <https://www.agriland.ie/farming-news/wildfire-worries-could-halt-hill-walking-on-farmers-land-inhfa/> Such coverage is unhelpful, and could discourage hillfarmers from permitting responsible recreation activity on their land.

Mountaineering Ireland supports the argument made by Vincent McAlinden that the use of the term 'wildlife' suggests that gorse, heath and even forest are worthless, and also that 'wildfire' gives the impression that these fires start spontaneously when, as stated in the preamble to the consultation, most of these fires are started deliberately.

Mountaineering Ireland agrees that 'vegetation fire' seems a more appropriate phrase than wildfire, 'vegetation burning' might be even better as this indicates the deliberate action that underpins most of these fires.

*<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/2017%20Guide%20to%20Land%20Eligibility.pdf>

Question 5 - Do you know of any initiatives that could help reduce the number of wildfires in the countryside?

As stated above, a change in terminology might give a more accurate picture of what these fires are about – vegetation burning.

Public information, both preventative and news reporting, should emphasise that vegetation fires take firefighting resources away from house fires, road traffic accidents and other incidents, thereby putting human life and property at risk. News reporting of vegetation fires should include footage of burnt habitat, possibly even charred wildlife, nests etc and interviews with nature conservation authorities, Northern Ireland Water or others who can explain how the ecosystem services of the land is undermined by burning.

Separately there is need for advocacy in relation to the value of upland habitats, so that the public, including landowners, have a better appreciation of why it is important to care for the natural environment. The multiple benefits provided to society through sustainable management of upland areas include scenic landscapes, carbon sequestration, better water quality, flood mitigation, enhanced biodiversity and opportunities for high quality recreation experiences. **Mountaineering Ireland's vision for the future of Ireland's mountains and upland areas is that these areas will be valued and protected as environmental, cultural and recreational assets.** The vision is summarised in the attached article (see http://www.mountaineering.ie/files/2018125165120_a7c3a75d.pdf).

Question 6 - Can you suggest any locations that should be specifically targeted for actions?

As fires are planned in advance, prevention also needs to take place in advance. The records of fires over recent years should indicate areas that have been subject to a greater incidence of fires. Where there are AONB management bodies, landscape partnerships, or similar organisations in place, these should be used as vehicles for awareness raising. Community groups in affected groups are potential vectors for promotion of a fire prevention message. Publicity in the local press and on radio could also assist.

There is need for targeted messaging as well, working through the farmers' representative organisations and through the farming press and websites such as www.agriland.ie.

Question 7 - Do you know any legislation or permitting systems relating to the lighting of fires in the countryside? Is there a need to review and update or develop new legislation and permitting systems related to wildfire prevention? If so why and how?

As mentioned above, the place of burning within the Guide to Land Eligibility should be examined from an ecological perspective. The non-eligibility of bogland for area-based payments, and the use of umbrella term 'Marginal land' to cover land that may be designated by the EU as 'priority habitat' contributes to a view that such land is worthless. Yet this land provides a range of ecosystem services, these services need to be valued and rewarded in future farm payments schemes, possibly through an outputs-based payment scheme which rewards farmers based on the quality of the environment on their land.

The Game Preservation Act (Northern Ireland) 1928, which deals with the burning of vegetation, is concerned with the protection of cover for game, but seems to allow for burning to be 'carried out in the ordinary course of farming'. This suggests that it might be difficult to prosecute a farmer for vegetation burning. Prevention is preferable to prosecution, but prevention is only going to succeed if farmers believe that uncontrolled burning could have adverse consequences for them. For example, where farmers have burnt land are they required to show a management plan (as stipulated in the Guide to Eligible Habitats)? How many farmers seek consent from NIEA to the burning of designated land, and is there any follow-up to check that burning had adhered to the conditions of consent? Where consent is sought the names of those managing the fire should be provided to ensure that there is sufficient human capacity to deal with the fire. It is Mountaineering Ireland's position that there is need for enforcement of existing regulations.

Question 8 - Is the current level of law enforcement effort that is focused on wildfire incidents sufficient or should it be enhanced?

The fact that there were over 2,000 wildfires reported in 2017 and the absence of information in the public domain about successful prosecutions are both clear indications that the current enforcement effort is not sufficient.

While prosecution of a landowner for illegal burning could result in the landowner being portrayed as a victim, the pursuit of a prosecution in a small number of carefully selected cases could be helpful. Careful media management around such cases could assist with public understanding and also spread awareness of the potential penalties amongst those who may be considering vegetation burning.

Briefing workshops are perhaps first needed amongst those who are in a position to gather evidence which would assist with a successful prosecution (including NIFRS, PSNI, DAERA officers, NGO employees e.g. Ulster Wildlife Trust, Mourne Heritage Trust and members of the public).

Question 9 - Like the Mourne, would targeted management of vegetation fuel load / interrupting treatments be beneficial in others parts of NI? If so where and why?

The reference to habitat as ‘fuel load’ implies an acceptance of fire. As the fires in question are started by people, rather than natural processes, changing the landscape to mitigate the spread of fire is an attempt to control symptoms, however the root causes of the problem need to be addressed. The burning of vegetation is at least in part motivated by policy conflicts and a current farm support system which does not place a high value on quality habitat.

Mountaineering Ireland supports Vincent McAlinden’s assertion that the language around this issue also needs to change – this is about the destruction of valuable habitat; the pollution of drinking water; the emission of thousands of tonnes of carbon; and the diversion of scarce fire-fighting resources etc. away from accidental fires.

Question 10 - What initiatives would you recommend be used or developed to help manage fuel loads?

These are fire susceptible habitats, not fuel.

Vegetation burning depletes or degrades Northern Ireland’s limited stock of natural capital – which is made up of air, water, minerals, soils, fossil fuels and all living things. Mountaineering Ireland would like to see natural capital accounting used to inform action and decision-making in relation to Northern Ireland’s natural environment, including how to deal with vegetation burning. Putting a monetary value on that natural capital (e.g. the carbon storage, flood mitigation, biodiversity, recreation and other ecosystem services provided by fire susceptible land), could provide a better basis for decision-making, provided the approach is integrated across the policies and programmes of all relevant government departments.

Question 11 - Do you think wildfires would be better managed in NI if we had further weather research or warning services? If so what is required and why?

Again, it is important to consider that very few vegetation fires in Northern Ireland are accidental, so publicising times of high fire risk may encourage the lighting of fires rather than prevent it.

Having people trained to assist the NIFRS in dealing quickly and effectively with vegetation fires would curtail the extent of the losses from such fires. Due to the nature of the terrain and the scale of vegetation fires, preparation and coordinated action are important.

Question 12 - Are there any areas that merit bespoke wildfire management plans in NI? If so why?

Areas with expanses of fire susceptible habitat such as mature heather, e.g the Mourne, Belfast Hills, Sperrins etc. Wildfire management plans should cover proactive fire prevention aimed at protecting landscape (based on its ecosystem services), as well as measures for the effective and efficient fire containment when a fire event occurs.

Question 13 - Are there any initiatives that would enhance collaborative and co-ordinated actions to respond to wildfires in NI?

The context provided with this question is largely irrelevant, because Northern Ireland does not have the type of wildfires experienced in the United States; our problem is fires started by people. It is too easy to simply blame landowners for the burning that occurs, the reasons for this activity must be understood, the policy conflicts addressed, and arrangements put in place to reward the sustainable management of Northern Ireland's natural capital. This will require honest engagement between all agencies involved and with farm organisations, trustees and individual landowners.

Question 14 - Do you think we need to develop a strategic direction for wildfire work in NI? If so how could this be achieved?

As there is risk, skill and a significant cost involved in the control of vegetation fires, in addition to the as yet uncalculated cost in terms of natural capital, it would make sense to have a planned and co-ordinated action plan to reduce habitat loss from deliberate fire events.

Question 15 - What would be your one-line vision for NI in relation to wildfire management?

The deliberate burning of hill and coastal vegetation no longer takes place because landowners are concerned with, and rewarded for, maintaining the quality of the habitat on their land.

Question 17 - How should success regarding wildfire reduction be measured or monitored?

The simplest metric is reduced reports of vegetation burning, and a reduced area affected.

In the short-term, while vegetation fires are still occurring, there will be need for leadership and co-ordination in how these fires are tackled, and how skills are shared. That might best be achieved through a task force, which also addresses measuring and monitoring.

In the short to medium term this requires an integrated solution, covering public awareness of the value of natural and semi-natural habitats, natural capital accounting, engagement with landowners, and the design of farm payment arrangements which reflect ecosystem services provided and environmental condition.

As agriculture and environment functions are now both within one department this should help in addressing the current policy conflicts and ensuring that Northern Ireland’s natural assets are valued and protected for the benefit of future generations.

In the medium to long term it should be possible to measure success through monitoring habitat condition, this could be complemented by records of increased natural capital values.

Question 19 - Who should be part of these management structures?

Farmers, farmer unions, DAERA (NIEA and agriculture), Forest Service, NI Water, AONB management groups, Northern Ireland Environment Link, the Education Authority (involving youth workers and teachers), National Outdoor Recreation Forum and Northern Ireland Fire and Rescue Services.

Regard should be had to the multi-stakeholder approach to the sustainable management of upland areas which is advocated by the Irish Uplands Forum (www.irishuplandsforum.org).

Question 20 - As wildfires do not recognise borders should we engage with our counterparts in the South in relation to wildfire initiatives?

Absolutely, not just because fires do not recognise borders, but also because there are similar problems with uncontrolled burning in the south and clear potential for shared learning. However, it will be equally important to have engagement with parts of the UK, to learn how the issue has been tackled there and how the transition can be made from rough grazing land being considered worthless to valuable habitat, the quality of which should be protected and enhanced in the public interest.

Question 21 - How important do you think each of the following wildfire initiatives are in NI?

	Very Important	Important	Slightly Important	Not Important
Development of a strategic direction for wildfire work		Yes		
Development of management model to address wildfires		Yes		
Undertake initiatives that could help reduce the number of wildfires	Yes			
Review and update/develop new legislation related to wildfire	Yes			

	Very Important	Important	Slightly Important	Not Important
prevention				
Review and update/develop permitting systems relating to lighting of fires in the countryside				Yes
Enhanced law enforcement efforts focused on wildfire incidents	Yes			
Increase targeted management of vegetation fuel load / interrupting treatments in specific landscapes			Yes	
Undertake research into wildfire fire behaviour and likelihood		Yes		
Develop bespoke wildfire management plans for parts of NI			Yes	
Increased collaboration and co-ordinated actions to respond to wildfires	Yes			
Monitoring of wildfire incidents	Yes			

Further information

Mountaineering Ireland would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

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