

From: [REDACTED]
To: [REDACTED]
Subject: RE: Wildfire guidance
Date: 25 June 2025 15:32:46

Hi [REDACTED]

Do you have a risk assessment / method statement / emergency procedures etc, that covers this activity, I'm willing to have a look at it for you / with you, to build a case for a new guidance / policy to be created or reviewed.

I would be interested in [REDACTED] opinion on this as he's the newly appointed wildfire lead, and if he finds that this policy supplement isn't relevant to the activities you're describing then it may need a review or something new created. Or advice on how to best implement the policy in to working practices.

In terms of what's now agreed policy, I can understand your frustrations about how this may not be the best approach to the situations you face, but our agreed policy on wildfires is that that no staff should be fighting fires that are larger > than 1m² (bonfires).

In my last role as a fire risk assessor and investigator for HMPPS. I can see why these protocols have been put in place, I have seen the effects of smoke inhalation and how only a few breaths can cause unconsciousness and even death. Whilst this is a low likelihood, the severity is very high. Also, I agree that measures need to be sensible and proportionate to the risk, and I don't think RPE (at the level required) would be a sensible control measure.

Best Regards

[REDACTED]

[REDACTED]

Health and Safety Senior Officer

Natural England

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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HealthandSafety@naturalengland.org.uk

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From: [REDACTED]

Sent: 25 June 2025 10:18

To: [REDACTED]

[REDACTED]

Subject: RE: Wildfire guidance

Hello [REDACTED]

[REDACTED]

The point is that these smoulders are slow and predictable – and if an incident was not slow and predictable the FRS would be dealing with it not us. They're much more like charcoal burning (an activity that takes place on some of our woodland NNRs) than the fires that people may have in their mind's-eye as a wildfire. Small peat smoulders are not associated with serious risks of burns and smoke inhalation. We quite obviously stand upwind if there's much smoke. All of us have been subjected to much higher levels of smoke when under the direction of the Fire Service during wildfires – and perhaps some sort of respiratory protection could be appropriate for all of these situations. The risk of getting burned is incredibly low. Yes, the peat surface may be hot and there may be some embers or even small flames – but we just pour water on the hot areas from a safe distance. We're used to working with hot surfaces as most of our machinery creates hot surfaces – we just don't touch hot things outside on the NNR or in the kitchen at the reserve base! We've never had to raise a near hit or incident in relation to this activity – and we would consider the greatest risk as being associated with manual handling of equipment such as pumps or knapsacks/buckets of water.

Is this guidance permanent or is there scope for reviewing it light of the reduced risks associated with smouldering peat? If so, how will we deal with the damping down in future after a large wildfire? We cannot demand that the Fire Service complete the damping down to an extent that all hotspots remaining when they leave site are <1m2? Do we just leave those hotspots to smoulder and slowly get larger burning and cratering the NNR? The consequences of this aren't just short-term – fires permanently reduce the restorability of peatlands. How much permanent damage to an SAC peatland is acceptable under these circumstances? Is there a risk of reputational damage to NE?

We do our best to nurture a positive Health and Safety culture at the Humberhead Peatlands – and I'm really proud of the way my colleagues approach their work in this regard. We've very much embedded it as the cornerstone of everything we do – which is exactly the way things should be. That culture depends on NE's approach feeling proportionate and sensible. This is hard to accept as all of us are trained and experienced in extinguishing peat smoulders safely and have been doing so for many years – and that approach has been backed by NNR Ops, both prior to and since the guidance was written, through the provision of funding and the purchase of machinery and equipment to do so. It may sound extreme, but if we hadn't been doing this – especially after the FRS have left site after the 2020 Hatfield Moors fire – then there would be very little peat left over significant parts of Hatfield Moors SAC. It would just have smouldered away.

Best wishes

[REDACTED]

From: [REDACTED] [@naturalengland.org.uk>](mailto:@naturalengland.org.uk)

Sent: 24 June 2025 17:18

To: [REDACTED]

Subject: FW: Wildfire guidance

Hi [REDACTED]

Please see [REDACTED] responses in red below, if you would like to discuss further [REDACTED] will be happy to arrange a call.

Kind regards

[REDACTED]

Senior Health and Safety Officer

Health & Safety Team

Tel: [REDACTED]

[REDACTED] @naturalengland.org.uk

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[REDACTED]

[REDACTED]

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From: [REDACTED] [@naturalengland.org.uk>](mailto:@naturalengland.org.uk)

Sent: 24 June 2025 14:38

To: [REDACTED]

[REDACTED]

[REDACTED]

Subject: RE: Wildfire guidance

Thanks [REDACTED]

For me this raises a lot more questions than it answers!

I would suggest that this does not cover peatland fires – which are not necessarily 'vegetation' fires as defined by this guidance. (this policy covers all types of wildfires, and

the definitions are more relevant to the size and output of the fires) At HHP NNR we have routinely extinguished peatland fires that in terms of extent would be defined as 'wildfires (small)' under this guidance. We're trained and experienced in doing so. After large fires the FRS routinely leave us with what this guidance may define as 'wildfires (small)' to finish extinguishing once they have left site. **This practice goes against the H&S Policy supplement for wildfires, our staff should not be risking smoke inhalation and burns no matter how trained and experienced they are. To fight fires of large or small classification they would need Breathing Apparatus or similar PPE to perform this task with a suitable and sufficient risk assessment in place.**

If we were only to deal with 'small fires' <1m², we could get rid of our fire-foggers and pumps, as buckets and knapsack sprayers would suffice – and we wouldn't need the wildfire training either. I suppose this would keep things simple, but we'd be tripling the occasions that we call out the FRS and the risks to the site would be increased if they could not respond quickly due to high demand. **(this is a different risk, but I would emphasise that our people are our most important assets and legally we have an obligation to our staff and volunteers to keep them safe, this must take priority over FRS requirements and NE Strategic goals for nature restoration work)** They'd also need to be on site for much longer as we could only damp down tiny areas – in the case of the 2020 wildfire that would be weeks longer.

If FRS are on site then they do the extinguishing and our role is just to carry kit/equipment/firecrew around for them and provide local knowledge. In the really big wildfire at Hatfield in 2020, the FRS did ask NE to damp down areas that would be classified as 'wildfire (small)'. Whilst this may be 'under their direction' it didn't mean that they were with us or taking responsibility for our safety during this activity – as could be expected from an incident covering 700ha.

So, either we need to completely change the way we do things do things and rewrite our Emergency Plan and Wildfire Management Plan, or the guidance needs reviewing to cover peatland fires. If the latter, should the H&S Team like some input from colleagues with practical experience of tackling peatland fires then we can certainly help with that. **(Whilst this is a H&S policy its owned by the wildfire working group, Its been approved and collaborated on by both functions)**

Anyway – some immediate clear direction as to whether this guidance covers non-vegetation peatland fires and whether we need to immediately stop extinguishing peat smoulder >1m² in extent is needed. **(yes All wildfires)**

Best wishes



From: [REDACTED]
Sent: 24 June 2025 13:12
To: [REDACTED]
[REDACTED] >
Subject: RE: Wildfire guidance

Hi [REDACTED]

Thanks for the prompt, I've attached a copy of the wildfire guidance, I've C.c in [REDACTED] and [REDACTED] for reference bu tit might be worth sharing with the wider Team.

[Health and Safety Policy Supplement - Wildfires.docx](#)

I'm not sure how well the archiving documents old documents went down either, it should just be a case of saving the new risk assessment with the date in the title and then moving the old file to a new folder marked archive.

If anyone needs nay further clarification let me know.

Kind regards

[REDACTED]
[REDACTED]

Senior Health and Safety Officer

Health & Safety Team

Tel: [REDACTED]

[REDACTED] @naturalengland.org.uk

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From: [REDACTED]

Sent: 24 June 2025 09:41

To: [REDACTED]

Subject: Wildfire guidance

Hello [REDACTED]

It was good to see you yesterday. At the end you mentioned some guidance on extinguishing wildfires. I can't find it on the intranet – do you have a link or a copy you could email me?

Thanks for your help

Best wishes

[REDACTED]