



The Moorland Association

Sarah Albon
Chief Executive
Health and Safety Executive (HSE)
151 Buckingham Palace Rd
London SW1W 9SZ

15 July 2025

Dear Ms Albon,

The HSE's duty to follow the science and prevent wildfires becoming catastrophes

Our countryside is daily being scarred by blazes that pose escalating risks to firefighters and the general public. Such wildfires are an increasing global problem. But the UK is out of step with the prevention-led approach of the international community. They are listening to the science which we are ignoring.

This letter is (i) to ask the Health and Safety Executive to step in to stop our crisis turning into a series of catastrophes and (ii) to offer the assistance of the Moorland Association whose members are at the frontline of fighting fires.

Protecting People and Places

A number of UK public bodies have long identified our accelerating problem.[1][2] The Climate Change Committee said 2022 saw an “unprecedented” number of wildfires.[3] Yet that record has been broken this year. By April we had already seen the highest ever annual amount of land burnt.[4]

The National Fire Chiefs Council (NFCC) has warned that wildfires are now crossing the rural-urban interface. As they do political concern will intensify. This year's disaster in Los Angeles, was a hellish insight into the devastation wildfires can cause. Some 30 lives were lost and 200,000 forced from their homes.[5]

Even when the flames do not reach our cities, the smoke does. During the 2018 Saddleworth Moor fire, toxic fumes affected 5 million people in the Manchester area causing 28 premature deaths.[6] The New Scientist reported how such intense fires throw into the air historic pollutants including lead and cadmium.[7]

In helping you understand these challenges, the Moorland Association hopes to be of help because there is a clear overlap between our role in upland conservation and your mission of “*protecting people and places*.”[8] This includes people in rural areas who are increasingly vulnerable to wildfires. The House of Lords Library has spoken of how for them wildfires pose a “*serious threat to life [for] emergency responders and members of the public*.”[9]

Farmers, gamekeepers and visitors are all facing rising risks – threats which would never be tolerated in towns or cities. Rural residents deserve the same level of protection as urban populations.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

Why So Many Wildfires?

Over the past two decades climate change has brought a sharp decline in relative humidity in the UK which means our vegetation dries out more rapidly.[10] Combined with increasing hot weather, this means that even a small spark can ignite a major, fast-spreading fire. Scientists project that the number of high wildfire-risk days could quadruple by 2080.[11]

These climate-related hazards are combining with changes in land management which have greatly increased the fuel load of combustible vegetation. These have been driven by policies which have sharply reduced traditional methods of removing vegetation and creating firebreaks. For instance, there has been a 7% decline in sheep grazing since 2022. This has meant that hundreds of thousands of tonnes more grass and scrub is left each year.[12]

Other regulations have effectively banned controlled burning and mowing across much of our moorlands. These vegetation management methods have dropped by 73% in some areas.[13]

Large swathes of vegetation are now massive tinderboxes. In these areas overgrown vegetation used to be broken up by grazing or small winter burns. Today we have huge continuous expanses of fuel. Even gullies and streams which used to be kept clear of overgrowth to provide natural firebreaks have become highways for wildfires.

Our largest and most devastating wildfires are occurring in upland areas – precisely because these landscapes now contain vast areas of vegetation.[14]

Eventual ignition of this dry vegetation is inevitable - whether from arson, barbeques or lightning. Yet today's sparks are encountering much bigger fuel loads. The result is wildfires that burn hotter, faster and deeper into peat soils than those of the past.

Firefighters find many of these wildfires impossible to control and withdraw because they cannot be managed safely.[15]

Possibly of even greater concern is new research which shows that such wildfires release far more pollutants than used to occur when we prevented them with prescribed burns. [16] Related data from the USA shows that in absolute terms *"prescribed fires produce only around one-tenth of the PM2.5 emitted by wildfires."* [17]

So science is proving that ancient practices are smarter than vogueish ideologies.

Gaps in Wildfire Prevention

The NFCC has expressed concerns that, despite the escalating problem, the Government response remains fragmented. It has called for *"joint working across different departments to ensure aligned strategic decision-making on the prevention and management of wildfire risks"*. [18]

From our perspective, we note that while Natural England is creating policies which increase fuel load, it does not employ any wildfire specialists to balance its ecological goals with human safety.

We therefore ask the HSE's leadership to bring its wildfire expertise into discussions with colleagues at the NFCC, MHCLG, Defra and Natural England and to insist that safety comes first. Together you need to decide how we can stop *"adding fuel to the fire"*.

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

The Unacceptable Cost of Inaction

What disturbs us most is that we have heard officials say that “*nothing will change until there is a death.*” Waiting for a tragedy before acting decisively is beyond unacceptable. It is not a policy - it is a dereliction of duty.

To encourage action, we have written to the Home Secretary and to the Deputy Prime Minister who has now taken charge of the Government’s response. We have also sent letters to Defra and now to yourselves. It is not just us. Multiple official sources have given repeated warnings about the growing threat.[19]

In the wake of the Heathrow substation failures, the media and the public have little patience for the predictable being ignored.

Urgent Intervention and Request for HSE Action

In light of the above, we request you do the following:

1. **Meet the Moorland Association this month:** fires are no respecters of official schedules. We would like to offer on-the-ground perspectives of those living on moorland.
2. **Initiate a Wildfire Risk Review:** the need is to review wildfire prevention and response policies as they relate to public safety in moorland areas. It could evaluate current measures, identify problems with regulations and recommend actions to ensure standards are being met.
3. **Convene a Wildfire Safety Summit:** when the most urgent issues have been dealt with you could then invite the key stakeholders to discuss how their policies will impact next year’s wildfire season. It could include the NFCC, Defra, MHCLG, UK Health Security Agency, Natural England, the Met Office, public health representatives, land management and conservation bodies and fire representatives from high-risk regions.

The international community is moving quickly to respond to the emerging science and embrace wildfire reduction measures. For example, last month the G7 and the United States issued statements endorsing the use of preventative burning. For its part, the EU has endorsed increased grazing.[20]

In this country, we have to start where we are, and start now. The Moorland Association’s members, who manage one million acres of upland, are investing in fire mitigation training, equipment, and collaborative efforts with Fire and Rescue Services.

But we cannot do it alone.

Yours sincerely,

Andrew Gilruth
Chief Executive
Moorland Association

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

CC

- 1) Secretary of State for Ministry of Housing, Communities & Local Government, Angela Rayner MP
- 2) Secretary of State for Environment, Food and Rural Affairs, Steve Reed OBE MP
- 3) Parliamentary Under Secretary of State for Nature, Mary Creagh CBE MP
- 4) Parliamentary Under Secretary of State for Building Safety, Fire & Local Growth, Alex Norris MP
- 5) Chair of the UK Health Security Agency, Ian Peters
- 6) Chair of Natural England, Dr Tony Juniper CBE
- 7) Chair of the National Fire Chiefs Council, Mark Hardingham
- 8) Vice Chair of the National Fire Chiefs Council, Phil Garrigan
- 9) Chief Fire Officer of Cleveland Fire & Rescue Service, Peter Rickard
- 10) Chief Fire Officer of County Durham and Darlington Fire & Rescue Service, Steve Helps
- 11) Chief Fire Officer of Northumberland Fire & Rescue Service, Graeme Binning
- 12) Chief Fire Officer of Tyne and Wear Fire & Rescue Service, Peter Heath
- 13) Chief Fire Officer and Chief Executive of Cheshire Fire & Rescue Service, Alex Waller
- 14) Fire Service Lead of Cumbria Fire & Rescue Service, Paul Hancock
- 15) Chief Fire Officer of Lancashire Fire & Rescue Service, Jon Charters
- 16) Chief Fire Officer of Greater Manchester Fire & Rescue Service, Dave Russel
- 17) Chief Fire Officer of Merseyside Fire & Rescue Service, Phil Garrigan OBE
- 18) Chief Fire Officer and Chief Executive of Derbyshire Fire & Rescue Service, Gavin Tomlinson
- 19) Chief Fire Officer of Leicestershire Fire & Rescue Service, Callum Faint
- 20) Chief Fire Officer of Lincolnshire Fire & Rescue Service, Mark Baxter
- 21) Chief Fire Officer of Nottingham Fire & Rescue Service, Craig Parkin
- 22) Chief Fire Officer of Northamptonshire Fire & Rescue Service, Nikki Watson
- 23) Chief Fire Officer of Mid & West Wales Fire & Rescue Service, Roger Thomas
- 24) Chief Fire Officer and Chief Executive of North Wales Fire & Rescue Service, Dawn Docx
- 25) Chief Fire Officer of South Wales Fire & Rescue, Air Vice-Marshal Fin Monahan OBE DFC PhD
- 26) Chief Fire Officer and Chief Executive of Humberside Fire & Rescue Service, Phil Shillito
- 27) Chief Fire Officer of North Yorkshire Fire & Rescue Service, Jonathan Dyson
- 28) Chief Fire Officer and Chief Executive of South Yorkshire Fire & Rescue Service, Chris Kirby
- 29) Chief Fire Officer and Chief Executive of West Yorkshire Fire & Rescue Service, John Roberts
- 30) Chief Fire Officer of Hereford & Worcester Fire & Rescue Service, Jonathan Pryce
- 31) Chief Fire Officer of Shropshire Fire & Rescue Service, Simon Hardiman
- 32) Chief Fire Officer of Staffordshire Fire & Rescue Service, Rob Barber
- 33) Chief Fire Officer of Warwickshire Fire & Rescue Service, Ben Brook
- 34) Deputy Chief Fire Officer of West Midlands Fire & Rescue Service, Simon Barry
- 35) Chair of LGA Safer and Stronger Communities Committee, Cllr Heather Kidd MBE
- 36) Vice Chair of LGA Safer and Stronger Communities Committee, Cllr Tom Hunt
- 37) Principal Policy Advisor to LGA Safer and Stronger Communities Committee, Mark Norris
- 38) Chief Executive of the Yorkshire Dales National Park Authority, David Butterworth
- 39) Chief Executive of the North York Moors National Park Authority, Tom Hind
- 40) Chief Executive of the Peak District National Park Authority, Phil Mulligan
- 41) Chief Executive of the Northumberland National Park Authority, Tony Gates

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

Sources

- [1] Parliamentary Office of Science and Technology, 'Wildfire risks to UK landscapes', 15 April 2024, p 4. <https://post.parliament.uk/research-briefings/post-pn-0717/>
- [2] Cabinet Office, 'National risk register of civil emergencies: 2013 edition', 11 July 2013, p 8. https://assets.publishing.service.gov.uk/media/5a7c7ff040f0b62aff6c21b5/NationalRiskRegister2013_amended.pdf
- [3] Climate Change Committee concerned about "unprecedented" wildfires: 'Progress in adapting to climate change: 2025 report to Parliament', 30 April 2025, p 11. <https://www.theccc.org.uk/wp-content/uploads/2025/04/Progress-in-adapting-to-climate-change-2025-1.pdf>
- [4] Highest recorded extent of wildfires in UK: <https://www.thetimes.com/uk/environment/article/wildfires-britain-2025-3smwvwdgf>
- [5] 30 killed and 200,000 evacuated during Los Angeles wildfires: https://en.wikipedia.org/wiki/January_2025_Southern_California_wildfires
- [6] Saddleworth Moor fire exposed 5 million to dangerous pollution: <https://www.bbc.co.uk/news/uk-england-manchester-52208610> and the result was 28 premature deaths: "over the 7-day period 28 (95% CI: 14.1-42.1) deaths were brought forward, with a mean daily excess mortality of 3.5 deaths per day": https://www.researchgate.net/publication/340286590_Impact_on_air_quality_and_health_due_to_the_Saddleworth_Moor_Fire_in_Northern_England
- [7] The pollution included lead and cadmium: "because of extensive toxic fallout from factories a century ago... "There's 100 years' of pollution buried along with the peat as it formed," says [Professor Hugh] Coe." See New Scientist: <https://www.newscientist.com/article/mg23931853-300-smoke-from-moorland-wildfires-may-hold-toxic-blast-from-the-past/>
- [8] HSE Strategy 2022–2032. 'Protecting People and Places' – HSE role includes public assurance and safety in the environment. "The Health and Safety Executive (HSE) is Britain's national regulator for workplace health and safety. We are dedicated to protecting people and places, and helping everyone lead safer and healthier lives." <https://www.hse.gov.uk/aboutus/our-mission-and-priorities.htm#:~:text=The%20Health%20and%20Safety%20Executive,lead%20safer%20and%20healthier%20lives>
- [9] Wildfires: Reducing the risks and mitigating the effects. In Focus, Published Wednesday, 04 June, 2025. <https://lordslibrary.parliament.uk/wildfires-reducing-the-risks-and-mitigating-the-effects/#:~:text=,of%20California%E2%80%99s%20GDP>
- [10] Relative humidity in the UK has fallen sharply since 2000: <https://climate.metoffice.cloud/humidity.html#:~:text=While%20there%20is%20now%20more,%5D%20%25rh%2010yr>
- [11] Wildfire Briefing. Findings from the third UK Climate Change Risk Assessment (CCRA3), Evidence Report 2021. <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA3-Briefing-Wildfire.pdf>
- [12] Defra data shows the English flock fell by 7.2% over the last two year from 14,921,607 in 2022 to 13,830,855 in 2024: <https://www.gov.uk/government/statistics/livestock-populations-in-england/livestock-populations-in-england-at-1-june-2023> Average sheep consumes roughly 1.5 kg of vegetation a day. See Table 2 on page 11, https://projectblue.blob.core.windows.net/media/Default/Imported%20Publication%20Docs/FeedingTheEweGuide_240613_Web.pdf

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.



The Moorland Association

-
- [13] An RSPB funded study said that there was a 73% reduction in areas being managed by burning or cutting in the immediate aftermath of the Natural England ban on burning imposed under the Burning (England) Regulations 2021. See “Annual extent of prescribed burning on moorland in Great Britain”: <https://zslpublications.onlinelibrary.wiley.com/doi/10.1002/rse2.389> NB the model was unable to “fully separate burning from cutting on moorland” meaning that neither method of reducing fuel load was taking place in the 73% of land where excess vegetation was previously being managed.
- [14] Wildfires: Reducing the risks and mitigating the effects. In Focus, Published Wednesday, 04 June, 2025. “The largest wildfires in recent years have tended to occur in upland environments due to the large areas of continuous fuel available to burn in these habitats”
<https://lordslibrary.parliament.uk/wildfires-reducing-the-risks-and-mitigating-the-effects/#:~:text=The%20likelihood%20and%20impact%20of,densely%20populated%20than%20upland%20areas>
- [15] A Risk Assessment of the Peak District Moorland. Wildfire is inevitable. In association with: Natural England, Peak District National Park Authority, Fitzwilliam Wentworth Estate and Incendium Group 2022.
https://www.moorlandassociation.org/_files/ugd/f20ead_62c3c544947b44968044d0a4495dcfa0.pdf
- [16] Effect of Recent Prescribed Burning and Land Management on Wildfire Burn Severity and Smoke Emissions in the Western United States. Makoto Kelp, Marshall Burke, Minghao Qiu, Iván Higuera-Mendieta, Tianjia Liu, Noah S. Diffenbaugh (2025)
<https://doi.org/10.1029/2025AV001682>
- [17] Forest Service. U.S. Department of Agriculture. Rocky Mountain Research Station. Smoke 101 (2024) Differences Between Wildfire and Prescribed Fire Smoke in the Western U.S. https://www.fs.usda.gov/rm/pubs_journals/rmrs/sycu/2024/sycu101_2024_smoke.pdf
- [18] National Fire Chiefs Council, ‘Wildfires position statement’. <https://nfcc.org.uk/our-services/position-statements/wildfires-position-statement/>
- [19] NFCC concerns about fires leaping “rural-urban interface”: <https://nfcc.org.uk/nfcc-urges-public-caution-as-amber-wildfire-alert-issued/>
- [20] International approach to preventing wildfires are based on fuel load reduction.
- G7 statement on wildfires calls for use of “controlled burning”: <https://www.pm.gc.ca/en/news/statements/2025/06/17/kananaskis-wildfire-chart>
 - White House Executive Order advocates “preventative prescribed fires”: <https://www.whitehouse.gov/presidential-actions/2025/06/empowering-commonsense-wildfire-prevention-and-response/>
 - EU encourages grazing to reduce wildfire risks: <https://civil-protection-knowledge-network.europa.eu/stories/value-grazing-wildfire-prevention-tool>

Moorland Association members are proud to maintain over a million acres of open heather moorland across England and Wales - some of the rarest habitat on earth. Through a combination of innovation and research our members have proven they are best at protecting and maintaining it.