



Protecting Wildlife from Wildfires

And Illegal Grassland Burns



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Executive Summary

Wales has the highest rate of wildfires per unit area, which has earned it the unenviable title of wildfire capital of the UK¹. The threat posed by wildfires to wildlife, ecosystems and humans is already significant, and as climate change creates wetter winters and longer dry spells in spring and summer, that threat is set to increase. When considering wildfire prevention, it is important to examine ignitions and fuel. Most ignitions are as a result of human behaviour. More than 90 per cent of wildfires are either started deliberately or accidentally. There is much written about arson or carelessly positioned campfires which lead to wildfires, but there is much less known about the proportion of intentional grassland burns, carried out for land management purposes, which go out of control. These fires can happen if weather conditions change, or if conducted without sufficient skill, preparation or attention. It's the relationship between this burning, and the law that relates to its practice, that is the focus of this investigation.

Wildfire prevention professionals also consider fuel, and the possibility of reducing its availability. Prescribed burning to reduce the flammable vegetation load is relevant here. The most effective way to manage Wales' uplands for resilience to wildfire, flooding and carbon release, while also promoting long-term biodiverse habitat mosaics, is the subject of debate, which we also outline in the report.

We investigate the extent of grassland burning for land management purposes in Wales, look into whether *illegal* grassland burning is taking place, and examine the functioning of the legal framework that guides the rules of compliance.

Nature Investigations Unit Key Findings

- The legal framework which relates to the burning of grassland for land management purposes is not functioning adequately. Under current arrangements, the Welsh Government, which is legally responsible for compliance, cannot know, with any degree of accuracy, when or where controlled burns are taking place, and whether the burns are compliant with the Regulations. This is due to a number of significant data gaps that limit the ability to perform meaningful cross-checks.

- There is evidence to indicate that there is illegal grassland burning taking place, at least in mid and west Wales, during the spring months of April and May, the time of year when nature is at its busiest and when fires do the most damage to wildlife.

Wild Cymru Key Recommendations

- The law and guidelines that relate to controlled grassland burning need to be fundamentally overhauled, because, at present, they are not fit for purpose. Currently, it is possible to repeatedly carry out illegal grassland burns with near impunity. This has detrimental and wholly unacceptable consequences for Welsh wildlife and habitats. It presents a host of negative impacts for human populations too.
- Data gaps must be addressed as a matter of urgency, in order to allow for effective compliance, with the particular targeting of illegal burning in April and May.
- Since controlled burning is such a skilled technique, and carries inherent risk, *responsible* burning should come with training and “proof of competence” as part of a strengthened, more robust system.
- All methods of reducing vegetation, of managing land for resilience and long-term biodiversity, should be reflected in an updated Code, in training, and also in wildfire prevention awareness-raising programmes.
- There should be no burning over peat in Wales.

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1. Introduction

1.1. About Wild Cymru

1.1.1. Wild Cymru was founded in 2018 as a charitable organisation (charity number: 1180113). The charity's vision is of "a Wales with more wildlife in more places, created by a society that intrinsically values the natural world". It was formed in response to a growing need for an independent nature conservation organisation that could speak out and challenge environmental decision makers, in order to do more for wildlife and nature conservation in Wales. To achieve its aims, Wild Cymru undertakes a wide variety of nature conservation activities, including:

- Targeted species and habitat conservation projects
- Research, surveys and monitoring
- Practical habitat management and landowner advisory
- Community engagement and education
- Advocacy, campaigning and necessary litigation

1.2. The Nature Investigations Unit

1.2.1. Wild Cymru's Nature Investigations Unit was established in March 2026 with the purpose of creating campaigning journalism, which examines the pressing and the under-reported environmental issues facing Wales. It is advocacy for Welsh Wildlife, which is also underpinned by a public interest ethos, ensuring transparency, accuracy and the use of credible information drawn from verifiable sources. Comment and analyses are based on expertise or experience, and reported opinions are honestly held. As a charity, we are not *party* political and we maintain independence from Welsh Government due to the way we are funded. Through the Nature Investigations Unit, Wild Cymru hopes to strengthen its role as a leading and independent voice for wildlife in Wales.

1.3. Rationale

1.3.1. Given that nearly one in five species in Wales faces the threat of extinction², and that the Nature Investigations Unit has a mandate to produce journalism that will help to create meaningful change for nature recovery, we have devised the "1 in 5" series to meet that challenge. This series is comprised of five reports, each highlighting a pressure point for Welsh wildlife, and each looking at positive ways forward.

1.3.2. This work is the first of our investigations, "1 in 5: Regulating Nature Recovery", and it focuses on the need for adequate controls in order to stop or reduce the number of wildfires in Wales. Uncontrolled grass fires, commonly referred to as wildfires by the general public (see Terminology for the fire and rescue services' definitions), are

devastating for a number of our most endangered species (**Plate 1**). The yearly surge in spring grassland fires was at a record high in 2025 and materialised later in April and May in spring 2026 (**Plate 2**). This investigation explores the topic in the hope of illuminating non-compliance, which is likely to exacerbate the threat to wildlife and our environment. It is also hoped that the report will raise awareness of what is regarded as best practice, as well as highlighting successful prevention work. The debate has been polarising in England, Scotland and Northern Ireland. In contrast, here in Wales there has been a collaborative approach to wildfire prevention. This has led to much positive sharing of information and perspectives. However, most agree that we lack what would be useful information relating to the extent of grassland burning for land management purposes in Wales, and its relationship with wildfires.

- 1.3.3. It is not at all clear how the current law is or is not being implemented regarding burning practices on the ground; something that this investigation attempts to start to address. In exploring the legal framework, Wild Cymru would like to engage in a conversation which leads to a robust, transparent and workable system, which will, ultimately, help to reduce the number of uncontrolled fires and their damaging effects, while also improving deliverable, practical support for those who manage the land in a way which promotes both resilience and long-term biodiversity.

1.4. Project Aims

- 1.4.1. The aims of this investigation are to:

- help to protect wildlife and habitats by reducing the number of wildfires in Wales, particularly those which occur in the spring months of March, April and May.
- raise awareness about the rules which govern grassland burning by contributing to a national conversation.
- provide information about the way that the current Heather and Grass etc. Burning (Wales) Regulations 2008 and accompanying Code, are affecting practices on the ground.
- bring about improvements to the Heather and Grass etc. Burning (Wales) Regulations 2008 and accompanying Code, in such a way that supports compliance efforts, but also allows for effective enforcement for non-compliance.
- promote the range of methods available for managing land for resilience and biodiversity.

- highlight positive wildfire prevention work already underway and identify areas to target for future resource and support.



Plate 1: Scorched hillside at Tair Cairn in the Amman Valley April 2026.



Plate 2: Exposed Water Vole burrow in recently scorched habitat. Photo credit Rob Parry.

2. Summary

2.1. Why Investigate Wildfires?

- 2.1.1. Intense, frequent or large-scale fires (**Plate 3**) have many damaging impacts on Welsh landscapes. Wildfires have a negative effect on the following:
- 2.1.2. **Biodiversity:** Wildfires kill organisms and alter habitat composition, changing ecosystems by promoting species that better tolerate fire, like Heather, Molinia and Bracken, at the expense of fire-sensitive species³. Soil invertebrates are destroyed, as are the eggs and larvae of countless invertebrate species living on or within the vegetation. The loss of invertebrates has a knock-on effect on food webs and the species that depend on them. Ill-timed fires remove the breeding and nesting habitat for ground nesting birds. Skylark, Cuckoo, Whinchat, Meadow Pipit, Wheatear, Stonechat, Hen Harrier, Golden Plover, Red Grouse and Black Grouse are just some of the bird species negatively impacted as a result. Reptiles and amphibians are slower moving and unable to directly escape the fires. Mammals such as Brown Hare, Water Vole (our fastest declining mammal), and Field Vole are either lost as a direct result of the fire, or through habitat loss. Their population decline, in turn, influences predatory species like Polecat, Barn Owl, Short-eared Owl and Kestrel⁴.
- 2.1.3. **Carbon emissions and climate change:** Wildfires release carbon into the atmosphere, in gases such as carbon monoxide (CO), carbon dioxide (CO₂), and methane (CH₄), particularly if they occur over peat in the uplands. Additionally, wildfires have the potential to release nitrogen oxide and nitrogen dioxide (NO and NO₂), sulphur dioxide (SO₂), non-methane organic compounds (NMOC), and ozone (O₃)⁵. Wildfires also emit particulate matter (sulphates, nitrates, organic compounds etc) into the atmosphere⁶.
- 2.1.4. **Soil and water:** The removal of surface vegetation and changes to soil structure and composition means that rainfall reaches watercourses faster, exacerbating flooding. Eroded sediment can reduce water quality. Particulate matter falls on vegetation and alters fragile soil chemistry which, in turn, has the potential to reduce biodiversity. The effects of nutrification can be felt over large areas, particularly in upland streams and pools.
- 2.1.5. **Human health:** Wildfires put members of the public and emergency service staff at risk. Exposure to polluted air can have a detrimental effect on communities. As well as a threat to life, the reduction in air quality caused by wildfire smoke can cause respiratory and cardiovascular health issues.

- 1.1.1. **Economics:** It is difficult to estimate the true cost of serious grassland fires, taking in emergency control efforts, loss of productivity, health effects and restoration of environmental damage in the long term. Research in 2011, by the University of Manchester, put the annual cost of the UK's emergency response to wildfires at £55 million⁷. According to the Moorlands Association⁸, factoring in the broader impacts would put the estimated cost from wildfires in the UK in the hundreds of millions. In Wales, it's estimated that the wildfires of 2025, cost Natural Resources Wales, approximately, £800,000, including the cost of new fencing. Sending a helicopter to deal with an emergency effort costs approximately £120,000. Wildfires are costly⁹.



Plate 3: Elan Valley wildfire, April 2026. Photo credit Sorcha Lewis.

2.2. Nature Loss from Spring Wildfires

- 2.2.1. Although uncontrolled grassland fires can be devastating for wildlife at any time of year, Wild Cymru is particularly concerned about the extent of out-of-control grassland fires in the spring months (March, April, May). This is due to the extra damaging effect they have on wildlife and habitats. Typically, in Wales, grassland fires have been most prevalent in the spring (with an additional spike during the summer). In 2025, more than 62% of all annual grass fires, in Wales, occurred in the months of March, April and May combined.
- 2.2.2. In 2025 calendar year there were 3,747 “grass fire incidents” in Wales. There were:
- 880 in March¹⁰

- 747 in April
- 542 in May¹¹

2.3. Terminology: Wildfire, Primary, and Secondary Grassland Fires

- 2.3.1. There is no consistent use of the term 'Wildfire' across government agencies, media, and UK fire and rescue services. Uncontrolled grassland fires are referred to as wildfires in everyday speech. In ordinary general usage, wildfire is used to mean an uncontrolled fire that spreads across grasslands or woodlands or pastures, and upland areas. This usage will be employed in this report unless otherwise specified. For the fire and rescue services, and other official bodies, grassland fires must meet specific criteria to be classified as wildfires. The National Fire Chiefs Council definition of Wildfire is:

Wildfire Definition:

An uncontrolled fire requiring a decision/action about suppression, meeting one or more of the following criteria:

- Involves at least one hectare
- Sustained flame length exceeds 1.5 metres
- Requires at least four fire appliances
- Presents serious threat to life, the environment, property or infrastructure

The National Fire Chiefs Council (NFCC)

- 2.3.2. It is also useful to understand the terminology of the logging / record-keeping system employed by Wales' fire and rescue services (formerly the Incident Recording System IRS until 2025, and now the Fire and Rescue Data Platform FaRDaP). This refers to primary and secondary grassland fires. A primary grassland fire involves one or more of the following: human casualties, rescues, inhabited buildings, or more than five appliances. There is considerable overlap between the use of primary grassland fire and wildfire, and the two terms are sometimes used interchangeably in academic papers¹².
- 2.3.3. Secondary grassland fires are those which do not meet the primary grass fires criteria and are usually described in terms of the location. It should be noted that a secondary grassland fire could, at least in theory, meet the NFCC description of a wildfire.
- 2.3.4. Other descriptions to recognise when considering the 'grass fires' data is that these data refer to a whole host of fires. The Grassland, Woodland and Crop Fires data set includes the following fires: gardens, crops, woods, nurseries/market garden, heathland/moorland, grassland/pasture/grazing, scrub land, railway trackside vegetation, roadside vegetation and canal riverbank vegetation.

3. Research and Methodology

3.1. Journalism

- 3.1.1. This report is a journalistic endeavour. It is not an academic study and should not be viewed as such. It comprises of an investigation into specific issues, coupled with findings. The recommendations are those of the wider conservation organisation, Wild Cymru. These are based on the investigation findings and also on the charity's wider campaign in alignment with its aim to give a voice to Welsh wildlife.

3.2. Submission to the Interim Environmental Protection Assessor for Wales

- 3.2.1. As a result of witnessing regular uncontrolled mountain fires, concern about the spring surge, the largely, self-monitored burn plans, the lack of available data for cross checks, and the difficulties around enforcement, Wild Cymru made a submission to the Interim Environmental Protection Assessor for Wales (IEPAW), requesting that the team look at the functioning of the Heather and Grass etc. Burning (Wales) Regulations 2008, and the accompanying Code. As a result of the submission, the IEPAW held an evidence-gathering discussion with interested parties in March 2026. This included the RSPB hosting a visit to its Lake Vyrnwy Reserve, in Powys, to relay experience of the problem of uncontrolled fires in the area (**Plate 4**).



Plate 4: Members of IEPAW evidence gathering meeting at Llyn Vyrnwy (March 2026).

- 3.2.2. Stakeholders contributing to the information gathering meeting included; farming unions FUW and NFU Cymu, RSPB, Hafren Dyfrdwy, Natural Resources Wales (NRW), Rural Inspectorate Wales, Wales Wildfire Board and Mid and West Wales Fire and Rescue Service and Wild Cymru. The discussions have fed into a report by the Interim Environmental Protection Assessor for Wales, which is produced to advise Welsh Government Ministers.

3.3. Research Material

- 3.3.1. We have drawn on published and broadcast coverage of the issues from UK broadcasters; social media platform content including articles, blogs and comments; academic research papers and short articles in related periodicals; the records of the Senedd Cymru (plenary and committee records) and the UK Houses of Parliament records (House of Lords debates) including perspectives from Natural England, The Wildlife Trusts, the Moorlands Association and more: data from Stats Wales Welsh Government; statements from National Fire Chiefs Council, Wales' Fire and Rescue Services, Interim Environmental Protection Assessor for Wales, National Peatlands Action Programme, Dyfed Powys Police, South Wales Police, RSPB Cymru, Wales Wildfire Board.

3.4. Freedom of Information Requests

- 3.4.1. We sought to know, with accuracy, the extent of controlled burning in Wales. This was not possible to achieve through satellite imaging alone. Instead, we attempted to collate related data which might be indicative of activity. Freedom of Information (FoI) requests were submitted to Mid and West Wales Fire and Rescue Service, North Wales Fire and Rescue Service, and South Wales Fire and Rescue Service.

3.5. Site visits and Representations

- 3.5.1. Locations at Llyn Vyrnwy, Gower Peninsula, Amman Valley, Bridgend County, Elan Valley, Swansea and Aberystwyth gave us insight into live fire events and the aftermath of wildfire (**Plate 5**). In addition, site visits gave the investigations team a better understanding of different habitats, the ecology of managed uplands, uncontrolled grassland fires in protected areas, how commons are managed and methods of mitigation against wildfire.

3.6. Interviews

- 3.6.1. In the absence of complete data, and in an effort to better understand the social factors and lived experience behind the non-compliance of controlled burning, we conducted interviews both on and off the record, which have informed both this report and a short film. As part of this work, we heard from community groups, fire and rescue professionals, nature friendly farmers, police, the IEPAW, conservationists, wildfire

specialists and ecologists. Some contributions were recorded and some were not. The information shared with us helped to describe best practice approaches, practical barriers to following the Code, and gave unique perspectives on the differences between theory and experience on the ground. Understanding the issues in the round will be essential in order to support existing positive work, while also identifying ways forward to affect meaningful change where it is needed.



Plate 5: Elan Valley Wildfire, April 2026. Photo credit Sorcha Lewis.

4. Key Findings

4.1. Grassland Fires in Wales

4.1.1. The vast majority of all the grassland fires in Wales are caused by humans. In the *calendar* year, 2025, fire and rescue services in Wales recorded 3,747 “grass fire incidents”. In the *financial* year ending 2025, grassland, woodland and crop fires accounted for:

- 27% of fires in the Mid and West Wales FRS area,
- 17% in North Wales FRS area
- 13% of fires in South Wales FRS area¹³

The majority, approximately 70%, were started deliberately during the same time-period.

4.1.2. Though wildfires are an increasingly common, naturally occurring phenomenon around the world, in the UK, spontaneous natural ignitions are very rare.

2018 saw the UK’s first officially recorded wildfire caused by a natural ignition; in that case it was a lightning strike. The vast majority of all the grassland fires in Wales are caused by humans¹⁴.

4.2. Controlled Burning

4.2.1. Farmers and land managers burn particular areas of terrain to improve grazing, manage certain plants, or remove flammable vegetation to reduce wildfire risk. The Wales Wildfire Board uses the term *prescribed burning* to mean a planned application of fire under specific conditions to meet defined objectives. For example, fire and rescue services might burn a strip of thick vegetation which runs contiguous to a row of houses in order to create a fire break in the event of a wildfire. Controlled burning, for the fire professionals, is a non-technical term for any intentional fire that is meant to remain within defined boundaries. Park rangers or wardens might burn strategically managed patches of land in order to remove certain dominating species. Graziers might burn (unpalatable) old growth Heather and Molinia in order to encourage the emergence of fresh green shoots to increase grazing opportunities for their animals. These might be described as controlled or prescribed burning, depending on the thoroughness of the prescription and the execution.

4.2.2. It must also be remembered that nature conservationists also, occasionally, burn thatched areas of vegetation to increase sunlight to the ground layer for rarer plants to flourish. In some instances, prescribed burns are undertaken on undermanaged marshy grassland prior to the introduction of cattle management.

The critically endangered (UK) Fire Lichen *Cladonia peziziformis*, is only found on a few sites in South and West UK. The lichen only seems to appear in the aftermath of a heath fire, briefly establishing itself on the bare soil, then vanishing once the heath starts to recover¹⁵.

Plantlife UK

4.2.3. The intentional burning of grassland is legal, subject to detailed conditions, and when undertaken responsibly, these burns involve long term planning, preparation, resources and skill. As one fire prevention professional commented, “We rarely hear about the ‘good’ burners”. There are also people who carry out the practice of intentional burning without the requisite skill or number of people to keep the fire under control, and there are some who are ignorant of the rules but willing to comply.

4.2.4. However, there are also those whose approach to grassland burning is “light it and leave it”, which is both illegal and dangerous. The problem, therefore, is a nuanced one.

4.3. Law, Guidelines, Dates for Controlled Burning (Wales)

4.3.1. The Heather and Grass etc. Burning (Wales) Regulations 2008, and accompanying Code, relate to the control of burning heather, rough grass, bracken, gorse and *Vaccinium*¹⁶.

4.3.2. In Wales, it is permitted to burn this vegetation during daylight hours: 1st October - 31st March in upland areas, and from the 1st November - 15th March for other areas. Outside these dates, burning can only take place, in exceptional circumstances, with a licence.

4.4. Dates for Permitted Grassland Burning Scotland (UK)

4.4.1. **Scotland:** 1st October - 15th April but can be extended until 30th April. From autumn 2026, the Wildlife Management and Muirburn (Scotland) Act 2024 is due to introduce a mandatory licensing system and change the season to 15th September - 31st March. However, at the time of writing (July 2026), this timetable is has been paused.

4.4.2. **England :** 1st October - 15th April upland areas 1st November - 31 March for other areas.

4.4.3. **Northern Ireland:** 1st September - 14th April.

4.5. Burning Management Plan (BMP)

4.5.1. A Burning Management Plan, (BMP), usually known to users as a burn plan, is a legal requirement, and a completed plan should be kept available for inspection, should it

ever be asked for. You must not burn between “sunset and sunrise”, you must ensure there are enough people in order to keep the fire under control, and you must also notify the owners/managers of the land affected, and the owners of adjoining land of when and where you intend to burn.

- 4.5.2. A template for a burn plan can be found on the Welsh Government website. It includes details from the Regulations and the Code, such as guidance about making a map of the burn and no-burn areas, informing neighbouring landowners, and to take precautions for control, such as preparing fire breaks (**Plate 6**). Land managers are also advised to tell fire and rescue services, and those who wish to comply, and burn responsibly, do just that. But what of those who do not? Without any kind of registration ahead of a burn, there is very little cross-checking that can be done in order to hold individuals to account.



Plate 6: Fire breaks, Carmarthenshire. Photo credit Laurence Whitaker.

4.6. Burning Management Plan Compliance

- 4.6.1. Anecdotally, the feedback to us from some of the users of the burning management plan template is that they find it complicated, and that making it clearer and more accessible would be beneficial.
- 4.6.2. The Wales Wildfire Board have outreach teams undertaking community engagement work offering support to ensure that burn plans are compliant, and that land managers burn responsibly¹⁷. This is just one aspect of a much larger wildfire prevention programme. The Board is made up of partner organisations including the fire and

rescue services, the police, the National Park Authorities, Natural Resources Wales, the Farmers' Union of Wales and the National Farmers' Union, Young Farmers Wales, Swansea University, Public Health Wales, Pont, Keep Wales Tidy, Cadw, National Trust, Welsh Government, Wales Local Government Association, Met Office and Crimestoppers. They put out 'one voice' messaging and have two campaigns: **Wildfirewise** during the spring and summer, with advice regarding campfires and litter ignitions, for visitors to the outdoors and, **Burn to Protect**, which runs during the winter promoting responsible controlled burning.

- 4.6.3. As part of 'Burn to Protect', Jeremy Turner, an Arson Reduction and Wildfire Advisor with Mid and West Wales Fire and Rescue Service, says that face to face conversations, practical support, perhaps with paperwork or with the cutting of firebreaks, are the key to trusted relationships and working well within the communities.

If you're not familiar with the bureaucracy involved with the burning regulations then it's quite a challenge to get your head around. That's where we come in, that's where we'll help with the guidance, completing a burn plan prior to any burning...

"...We recognise that [controlled burning] is a valuable tool in the toolkit of land management and we'll help out by carrying out site visits, potentially cutting firebreaks, advising on best practice and the best ways that they can manage their environment against the risk of wildfire."

Jeremy Turner

Mid and West Wales Fire and Rescue Service

- 4.6.4. Expanding this kind of community work would involve extra investment at a time when budgets are being cut. However, this approach may be judged to be value for money when balanced against the cost of wildfires. There are also other areas where resources are needed: There is only a single Roboflail (specialist vegetation cutting machinery) to cut fire breaks across nearly two thirds of Wales (**Plate 7**). South Wales FRS also has one, but North Wales FRS does not.



Plate 7: Firefighter cutting fire breaks using a robo-flail, Carmarthenshire. Photo credit Laurence Whitaker.

- 4.6.5. In June, the Westminster Government announced £100 million for specialist teams to be stationed around the UK in order to tackle wildfires. One team will be in South Wales. Whether this will help with prevention work, or be dedicated to reactive wildfire response is not yet clear.

4.7. Extent of Controlled Burning: Wales

- 4.7.1. There is no reliable way of accurately determining the full extent of controlled burning in Wales. It is a legal requirement to have a burn plan, but, it is not known how many people fill in a burn plan and keep hold of it, as per the law, or how many people disregard the law. This is because the process is, largely, self-monitored and the plan is not submitted to any register or database. The Code advises that the local fire and rescue service should be informed before a burn takes place, but there is no specific legal requirement to do so, and no accurate way to find out if there is compliance or not.
- 4.7.2. In the absence of this information, we hoped that, perhaps, the contact traffic to fire and rescue services regarding controlled burning, might give an indication of controlled burn activity in Wales. Those who want to burn responsibly and comply, with the Regulations and the Code, do contact the fire and rescue service to give notice of a planned controlled burn.

4.7.3. In response to our freedom of information request, fire and rescue services in Wales disclosed that in 2025, they were notified of a controlled burn a total of **11,366** times.

- 4,440 contacts were to North Wales FRS
- 3,573 contacts were to Mid and West Wales FRS
- 3,333 contacts were to South Wales FRS

4.7.4. However, even these figures are somewhat imperfect. North Wales FRS told us that they record a notification of *any* controlled burn, which could include not only intentional burning for land management purposes, but also domestic bonfires or industrial yard fires. North Wales explained that there is no specific category in which land management controlled burns are logged because the primary concern, when going through the process, is to avoid unnecessary fire service attendance. They added that the reason for the burn is not as important from an FRS operational point of view.

4.8. Extent of Controlled Burning (UK)

4.8.1. Despite a growing body of research, the picture in other parts of the UK is also unclear. In its latest evidence review of controlled burning in the uplands (NEER155), Natural England examined studies from around the UK, including Wales. The authors concluded that, even with satellite imagery, it was difficult to accurately differentiate between the controlled burning of land and other management methods like cutting. However, it concluded that there is evidence of burning, including over deep peat, and in protected sites.

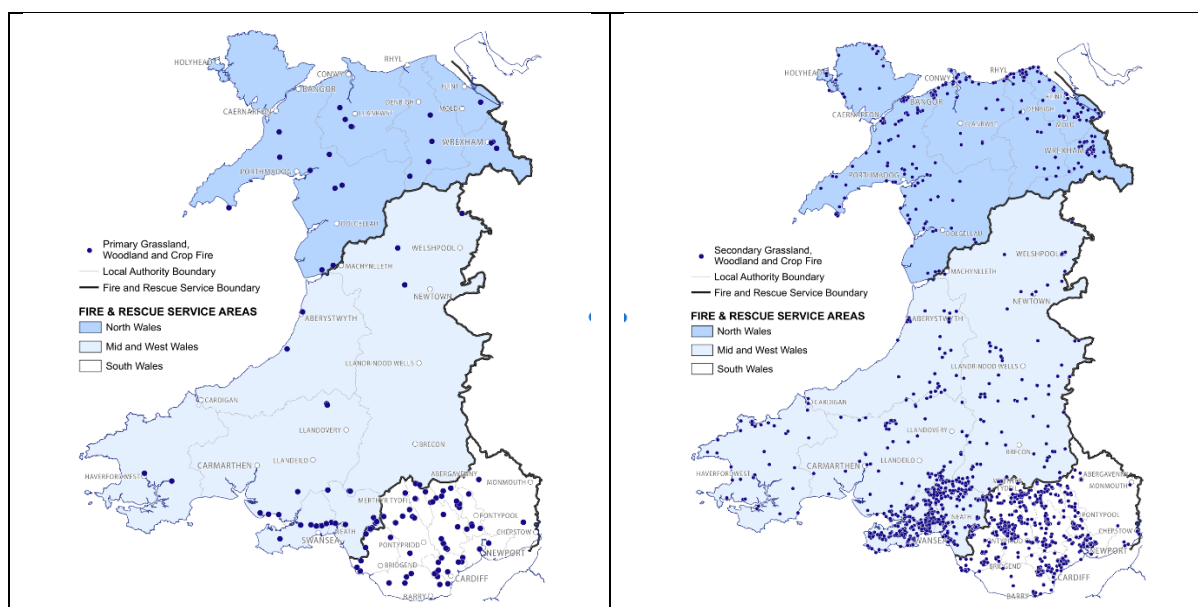


Figure 1: Map showing the Primary (left) and Secondary (right) Grassland, Woodland and Crop fires in Wales (FYE 2025). Welsh Government. Open Gov. Licence v3.0

4.9. Data Gap in Grassland Fires in Wales

- 4.9.1. There is a significant data gap when it comes to our knowledge of *all* grassland fires, in Wales. The maps (Figure 1) show Grassland Woodland and Crop Fires April 2024 – March, 2025 (of financial year ending FYE 2025), from the Welsh Government Statistics team. Sources and causes of grass fires are notoriously difficult to establish after the fact. It is not surprising, therefore, to learn that the source and cause of most primary grassland fires are not known. But, when they *are* known for primary fires, details of source and cause are logged. However, secondary fires are not treated in the same way. The source or cause of secondary fires, even if known or strongly suspected, are *not* logged. The majority of grassland fires in Wales, are secondary fires.
- 4.9.2. This means that the source and cause of any of the grassland fires in Wales that fall into this ‘secondary’ category, are never known and do not show up in the “Grassland, woodland and crop fires” data set, even if the professionals on the ground actually do know what caused the fire. In turn, this explains part of the reason why it is not possible to establish the relationship between controlled grassland burning and out of control grassland fires. We lack the data that would allow us to make an assessment. This seems surprising given that, as outlined, in section 2.3.3., secondary fires can also be wildfires, using the National Fire Chiefs Council definition. To illustrate the point, let us suppose that there is an uncontrolled grass fire burning across several hectares of mountainside. The fire is “at least a hectare”, which makes it a wildfire by the NFCC definition. Let us further suppose that it has been attended by teams attached to three appliances, with no threat to human life or occupied property. The fire and rescue teams think they have a source and suspect a cause. This is a secondary grassland fire, and a wildfire, damaging to wildlife and habitats. And yet, even though the source and cause are known or suspected, the current system would not allow for details to be recorded, or for anyone to be held to account. The incident would just show up in the data as a secondary grassland fire statistic.
- 4.9.3. We asked Andrew Wright, Chair of the Wales Wildfire Board, and Senior Specialist Advisor – Plant Health and Knowledge Transfer, NRW, why source and cause details relating to secondary fires, even if known, are not kept. He said that recording these details would present, “significant practical challenges. Fire and rescue services have a legal duty to respond to fires, not to investigate them. With several thousand grassland fires occurring annually, fire and rescue services do not have the capacity or remit to determine causes in the majority of cases... Work is going on at a Great Britain level to explore more consistent wildfire terminology and recording approaches.”

4.10. Relationship Between Controlled Burning and Grassland Fires (Wales)

- 4.10.1. We cannot accurately determine how many land management burns go out of control and lead to grassland fires (as outlined in 4.9.2), since, as all three fire and rescue services confirm, causes and sources of secondary grassland fires are not logged, even if they are known.
- 4.10.2. When asked how many controlled burns led to *primary* grassland fires needing attendance and requiring action (in the calendar year 2025), all three fire services answered – zero. In 2025, there were no controlled burns that led to primary grassland fires, where causes were known. Welsh Government statistics show that for most primary grassland fires, causes are never established.
- 4.10.3. However, where causes *were* known, for the five-year period ending March 2025, statistics show that 14% of primary accidental fires were caused by “intentional burning going out of control”¹⁸.
- 4.10.4. Though all three fire and rescue services confirmed that sources and causes are not logged for secondary fires, North Wales FRS did try to cross-check. They said that in 2025, there were 11 controlled burns for land management purposes that led to secondary grassland fires. They explained that they had been able to arrive at this figure by cross-checking the location and timings of the actual grassland fire, against the pre-existing notification of a planned burn record.

4.11. Relationship Between Controlled Burning and Wildfires (UK)

- 4.11.1. Natural England’s evidence review of controlled burning in the Uplands of the UK (which included studies from Wales) concluded that “there is strong evidence that managed burns escaping control cause a proportion of wildfires in the UK, particularly in the uplands”¹⁹. It also concluded that there is “strong evidence of a wildfire peak in spring and a lower secondary peak in the summer in the UK, *the former overlapping in part with the ‘burning season’*”.
- 4.11.2. However, the evidence review of the research studies looking at the proportion of wildfires resulting from ‘escaped managed burns’ (where a specific cause was assigned, which is a minority of cases), found a big variation in the results. There was a range from 15% - 60% across all study sites (lowland and upland). In the uplands alone, the range was 24% - 68%. The authors of the evidence review were left with an inconsistent picture.
- 4.11.3. One of the studies carried out by Natural England itself in 2020. It looked at 62 uplands wildfires, *where causes were known*, and found that of those, 42 (approximately 68%) were from intentional burns carried out for land management purposes that had,

subsequently, gone out of control. Once again, it should be noted that in 90% of cases of wildfire in this study, the cause was unknown²⁰.

4.12. Indication of Illegal Grassland Burning

- 4.12.1. Mid and West Wales Fire and Rescue Service covers almost two thirds of Wales. Its area (4,500 square miles) is predominantly rural, and includes the local authority areas of Carmarthenshire, Ceredigion, Neath Port Talbot, Pembrokeshire, Powys and the City and County of Swansea.

According to information disclosed as a result of our freedom of information request, we can see that Mid and West Wales Fire and Rescue Service was notified of controlled burns taking place more times *outside* of the permitted controlled burning dates than inside the permitted dates. This indicates that illegal controlled burning activity is taking place, at least in the Mid and West Wales FRS area.

- 4.12.2. In 2025, Mid and West Wales FRS was notified of controlled burning *outside* of the permitted dates, (April – September inclusive) **2,117** times. It was notified of controlled burns taking place inside the permitted dates (January – March and October – December) **1742** times.

4.13. Spring Surge

- 4.13.1. All controlled burning in Wales is supposed to stop at the end of March, in order to protect wildlife when nature is at its busiest. Typically, March sees a spike in controlled burns, as land managers attempt to carry out their burns within the permitted dates. For example, in March 2025, Mid and West Wales Fire and Rescue Service was ‘told about’ controlled burns 567 times. In the same month, during March 2025, there was also a spike in grassland fires. March 2025 saw 880 grassland fires (primary and secondary) recorded across Wales. That figure is approximately a quarter of the yearly total of grassland fires in a single month. As already explained, there is no log of the source or cause of secondary fires in Wales, and we cannot establish what proportion of controlled burns led to uncontrolled grass fires, but the two spikes in numbers overlap in the same month, and it would be beneficial to responsible land managers, policy makers and the general public alike, to be able to close the data gap, and cross-check to see how they interrelate.

4.14. Illegal Grassland Burning, in mid and west Wales, in April and May 2026

- 4.14.1. There is evidence (data and anecdotal) that indicates that there is illegal burning in the spring (April and May), in mid and west Wales. There is also qualitative testimonial evidence that indicates that, to take the Gower peninsula as an example, there are “a lot of fires, illegally started” (P.C. Simon Chadwick). There is one area of the Gower Commons that has been repeatedly subjected to uncontrolled grassland fires. This

year, according to community groups and community police teams, there was an illegal grassland fire started for land management purposes, which developed into a wildfire and burned through a Site of Special Scientific Interest (SSSI).

4.14.2. Despite the permitted period for controlled burns ending 31st March, data for the Mid and West Wales Fire and Rescue Service area indicate that the intentional grass burning does not stop.

4.14.3. FoI data show that Mid and West Fire and Rescue Service was notified of controlled burns taking place:

- 383 times in April 2025
- 379 times in May 2025

4.1.4.4. These data refer to notifications of all types of controlled burns, including domestic bonfires, but the numbers are such that it is reasonable to surmise that a proportion of them are grassland burns for land management purposes. They're outside of the permitted dates so (without a licence which grants special permission to burn in exceptional circumstances) these burns are illegal.

4.1.4.5. In addition, for Mid and West Wales Fire and Rescue Service, the number of 'good intent false alarms' (where the call was made in good faith, in the expectation that a fire service response was needed), due to controlled burns was recorded as:

- 69 in April
- 49 in May

4.1.4.6. While these data are only *indicative* of illegal controlled burning activity taking place, they echo anecdotal evidence that controlled burning can be at its most prevalent during spring.

Illegal grassland burning leading to wildfire: Gower case study, April 2026

Last March (2026) the typical spike in controlled burning did not happen in many places due to wet weather. Instead, on the Gower Peninsula, controlled burning happened in April and May instead, according to community groups and South Wales Police.

One illegal grassland burn became a wildfire and burned through 120 hectares of common land near Cefn Bryn, forcing the main road to shut and leaving a SSSI scorched and black.

PC Simon Chadwick, from South Wales Police, described what happened:

"This year's been particularly bad because we had so much bad weather in March, the burns were put off until later on in the year, until April and May. And during this time, it's

when the birds start nesting in spring, so it's been a lot later this year with the burns than normal years.

"... You see nests burnt. They're not targeted as such, but obviously they do spread to these areas as well. And we have animals being killed, nesting birds... When you speak to the fire service when they're putting out the fire, they come across... snakes, foxes, birds... That's really what's at the aftermath.

"...Parts of the Gower are SSSI which are protected under law. They can't be burnt at any time even if it was the burning season. It [a grassland burn after the permitted dates] would be classed as arson; criminal damage with fire... and other offences we look at is the Wildlife and Countryside Act, the destruction of birds' nests, the birds and other animals would be protected under the law as well.

"...It's arson at the end of the day. It's criminal damage with fire. You can apply for legal burning in the burning season. And you can submit that with the fire service and do it that way, but a lot of the fires we have are illegally started.

Wales Wildfire Board urges people to call Crimestoppers, anonymously, on 0800 555 111 if they see any suspicious activity.



Plate 8: Mid and West Wales Fire and Rescue Service (MAWWFRS) dealing with uncontrolled fire at Cefn Bryn Common April 2026. Photo courtesy of MAWWFRS.

4.2. Sanctions and Penalties

- 4.2.4. Welsh Government is responsible for regulation. In terms of monitoring and compliance, the burning management plan is supposed to be available for inspection should it be required. Knowledge of suspected non-compliance is usually reliant upon someone contacting compliance staff. Compliance teams also inspect a sample of farms periodically, as part of their general checks.
- 4.2.5. When we asked how Welsh Government ensures that controlled burning is being carried out in line with the Regulations and the Code, we were told that, “Instances of suspected non-compliance, such as uncontrolled or unconsented burns, can be reported directly to the Welsh Government’s agricultural scheme compliance team by emailing riwmailbox@gov.wales. In addition, as part of cross-compliance checks by Rural Inspectorate Wales, on selected farms, inspectors would walk all land. If they determine any burning has taken place, they would inspect the burning to ensure they were following the requirements of the plan. ...Where a land manager burns in areas designated as ‘no burn zones’, fails to control a planned burn, or carries out burning outside the permitted season, they may be subject to legal enforcement and face penalties, including reductions to their Basic Payment Scheme (BPS) support. “
- 4.2.6. In Wales, there were two compliance penalties in 2025. There were no compliance penalties in 2024.
- 4.2.7. As well as being responsible for monitoring burning compliance with the Code, Welsh Government is also the authority for issuing licences to burn outside the permitted dates. One licence was issued in 2025. No licence was issued in 2024.
- 4.2.8. Those found to be in breach of the Regulations can be issued with a ‘burning notice’, which requires the recipient to notify Welsh Ministers of any proposed burning of any vegetation for a two year period. The penalty for burning counter to the Regulations could be up to £1000, as well as reductions to the Basic Payment Scheme of farm subsidies.
- 4.2.9. Burning on protected sites would need consent from NRW to ensure there is no Operation Likely to Damage, under the Wildlife and Countryside Act 1981. Breaching this could bring a penalty of up to £2,500.
- 4.2.10. Consent is needed from Cadw in order to burn near a scheduled ancient monument. Burning in a way that causes damage can incur a penalty of up to £5,000 (Ancient Monuments and Archaeological Areas Act).

4.2.11. There are also other requirements when carrying out a controlled burn, relating to various legislation. It is an offence to disturb, intentionally or recklessly destroy protected amphibians and reptiles, birds, their eggs or nests during the breeding season, (Wildlife and Countryside Act 1981 and conservation regulations). It is illegal to burn in a way that:

- endangers anyone, including the public (Health and Safety at Work Act)
- is likely to cause injury, interruption or danger to road users (Highways Act)
- causes smoke, prejudicial to health or causes a nuisance (Environmental Protection Act)
- leads to water pollution (Water Resources Act)

5. Managing the Uplands for Resilience and Biodiversity

5.1. Restoring peatlands to reduce wildfire risk

- 5.1.4. Running concurrently with the discussion relating to compliance, is the debate about how to best manage the uplands for wildfire resilient ecosystems. Natural England's recent review of evidence relating to burning on peaty soils concluded that repeated or intense burning reduces peatlands' ability to store carbon and act as an upland sponge, soaking up rainfall and slowly releasing the water back into river catchments. Sphagnum moss, once dry, is easily outcompeted by heather and *Molinia*, leading to near monocultures. Changes to the Code in England now mean that it's no longer possible to burn over peat with a depth of 30cm or more, without a licence. The RSPB would like to see similar rules for the 4% of Wales covered in peat.
- 5.1.5. Dr Mike Shewring, a Senior Conservation Scientist with the RSPB (and a Wild Cymru trustee), says that prescribed burning, "locks us into a cycle of continuing degradation in UK uplands", favouring fire-adapted species, (e.g. *Molinia*, *Calluna*) and creating more fire-prone habitats especially in peatland areas. "Prescribed burning is not a tool that should be deployed at scale in our uplands as it has known negative effects on various ecosystem services," he adds. "There may be specific scenarios where it is the right tool for the job, at a specific location, at a specific time point, but this should be a last resort after exploring all other options, including habitat restoration, to reduce long term risk."
- 5.1.6. Much attention has been paid to the way that restored peatland in the Elan Valley appears to have stopped the intensity of a devastating wildfire there. It's thought that this fire may have been started by visitors to the hills, and there is no suggestion that it was connected to controlled burning. A spokesperson from the National Peatland Action Programme (NPAP) said, "...The Wales Peatland Action Evidence Group visited a restoration site at Elan Valley, shortly after wildfires in spring 2026... Wildfire stopped at the rewetted restored site (**Plate 9** and **Plate 10**). "NPAP promotes the multiple benefits of peatland restoration as a nature-based solution to address the nature and climate emergencies, also as mitigation in the landscape to the risk of flooding and wildfire spread."



Plate 9: Restored peatland, Elan Valley, April 2026. Photo courtesy of Elan Valley Trust.



Plate 10: Restored peatlands showing Wildfire resistance, Elan Valley, April 2026. Photo courtesy of Elan Valley Trust.

5.2. Prescribed Burning to Reduce Wildfire Risk

- 5.2.4. Some in Wales, including many in the farming unions, do not think that adding to the regulatory burden is helpful. They argue that the situation in Wales is not comparable with that in England or Scotland, where prescribed burns are carried out on large estates, usually to provide Red Grouse *Lagopus scoticus* with young heather to eat and to use as a canopy. Here in Wales, they say, a blend of methods, including burning, works well. Grazing and cutting are not always feasible, re-wetting is not always suitable for the terrain, and when skilled, experienced land managers carry out short prescribed ‘cool’ burns, which, they say, never reach the soil layer, these can provide effective vegetation control and create a mosaic of biodiverse growth. This view is shared by the partners of the Wales Wildfire Board including Professor Stefan Doerr, of Swansea University’s Wildfire Research Centre:

“We need to manage vegetation in those [peatland] environments to reduce the risk of a severe summer fire... because if we have a severe summer fire, and we had some in 2025, for example, we have an enormous amount of environmental damage, carbon losses, ecological damage, post fire erosion, water contamination and so on.

“So, we have... reason to make those upland peat landscapes as resilient as possible to wildfire. And one way of doing this is by removing the vegetation, and you do this by prescribed burning, by cutting, by grazing.

“Prescribed burning is one way that actually can be done relatively cheaply. If done well, it doesn’t cause any harm to the peat itself. There are still some ecological issues to consider but it’s all a trade-off between the risk of a more severe wildfire or a very mild fire that can reduce the risk of a severe fire. “

Professor Stefan Doerr, Centre for Wildfire Research, Swansea University

5.3. Grazing, Cutting, Mowing and Planting to Reduce Wildfire Risk

- 5.3.4. In 2016, one of the early iterations of the ‘Healthy Hillsides’ arson prevention programme, in the South Wales Valleys, a variety of pro-active land management measures to reduce fuel load were used, including grazing for conservation, controlled burns, cutting fire breaks, and clearance work, such as bracken bashing. Currently, though reducing flammable vegetation has a much narrower focus. ‘Burn to Protect’ promotes responsible controlled burning, provides firebreak cutting and education, but, at the moment, it does not employ specialists who can help with the other options for reducing vegetative load.

Through the process of this investigation there has been no evidence found to suggest that there is a national Wales-wide programme to promote the full range of land management methods available to help reduce fuel loads i.e. grazing for conservation, cutting, planting, rewetting, peatland restoration.

- 5.3.5. Some of the nature friendly farmers we spoke to expressed hopes that methods of land management for resilience against wildfire, including grazing for conservation and the cutting of fire breaks, might be incentivised within the Sustainable Farming Scheme.
- 5.3.6. Additionally, the updated Code for England²¹ includes many references to re-wetting, grazing, cutting and mowing as alternative methods of land management. These approaches are increasingly being adopted by large landowners in England, such as the National Trust. The Heather and Grass Burning Code for Wales 2008 is focused on prescribed burning only.

6. Conclusion

6.1. Key Findings

- 6.1.4. The legal framework which relates to the burning of grassland for land management purposes is not functioning adequately. Under current arrangements, the Welsh Government, which is legally responsible for compliance, cannot know, with any degree of accuracy, when or where controlled burns are taking place in Wales, and whether the burns are compliant with the Regulations. This is due to a number of significant data gaps that exist, which limit the ability to perform meaningful cross-checks.
- 6.1.5. The most significant data gap relates to the Burning Management Plan. The plans are, largely, self-monitored. There is no requirement to register the BMP on a database or with an official body. This seriously limits the ability to accurately identify those who do not comply with the Regulations and Code.
- 6.1.6. Another data gap relates to the recording of controlled burns by fire and rescue services. Notifications of controlled burns for land management purposes do not have their own distinct category. The notifications are mixed with *all* controlled burns. This impedes the ability to assess the extent of burning and to implement the legal framework. It should be noted that avoiding unnecessary attendance is the priority for already overstretched fire and rescue services.
- 6.1.7. The third data gap is connected with secondary grassland fires. The source and cause of secondary fires are not logged, even if known. Potentially, this could be a serious barrier to forming an accurate picture of why Wales has so many secondary grassland fires, and how they come to be ignited.
- 6.1.8. The investigation has examined statistics which indicate that there are, possibly hundreds, potentially thousands of illegal grassland burns taking place outside the permitted dates in mid and west Wales. This raises questions in relation to fire and rescue service protocol and the sharing of information.
- 6.1.9. Wildfire prevention work, including collaborative approaches to public engagement, in order to support those who are willing to comply with 'responsible burning', is both positive and valued by land managers. The fire and rescue services are uniquely placed to develop trusted relationships within local communities.

- 6.1.10. There is a pressing need for more specialist equipment used to mitigate against the spread of wildfires. Specifically, fire and rescue services possess only two fire break cutting machines for the whole of Wales.
- 6.1.11. There is an appetite for more training to be made available for land managers who want to control vegetation, increase land resilience and promote long term biodiversity. Training relating to controlled burning, as well as conservation grazing, rewetting, tree planting and cutting fire breaks, are also methods available to land managers.
- 6.1.12. Wales-specific research into the full costs of wildfires, including the ecological, environmental, health and financial implications is relatively scarce. Since Wales is “number one for wildfires” in the UK, more Wales-focused research would be beneficial for all.
- 6.1.13. There is evidence to indicate that there is illegal controlled burning taking place in mid and west Wales. After the permitted dates, at the end of March, fire and rescue service contact traffic, and police interviews, suggest that the grassland burns continue. This includes burning in April and May, when the fires are most damaging to nature. South Wales Police highlighted one particular illegal grassland burn, in April 2026, which became a wildfire that damaged a site of special scientific interest (SSSI) on the Gower Peninsular. It would be in the wider public interest to find out how prevalent this type of occurrence is, and to devise ways of reducing the harm caused by illegal grassland burning in Wales.

7. Wild Cymru's Key Recommendations

- The law and guidelines that relate to the controlled burning of grassland need to be fundamentally overhauled because at present, they are not fit for purpose. Currently, it is possible to repeatedly carry out illegal grassland burns with near impunity. This has detrimental and wholly unacceptable consequences for Welsh wildlife and habitats. It presents a host of negative impacts for human populations too.
- There needs to be greater investment from Welsh Government into compliance monitoring, cross-checking and site visits in order to stop illegal grassland burning. Oversight systems should be designed to support responsible practices while also dealing effectively with non-compliance.
- The data gaps relating to controlled burning in Wales should be closed as a matter of urgency to allow for meaningful cross-checks and compliance monitoring to take place. Anyone planning to undertake a controlled burn must be accountable from the outset. To this end, burning management plans need to be submitted to a database so that details are known throughout the process.
- Notifications of controlled burning for land management purposes to fire and rescue services need their own distinct category in any logging system. The sources and causes of *all* grassland fires (primary and secondary) should be recorded when known.
- Since controlled burning is such a skilled technique, and carries inherent risk to human life, property, wildlife, environment and the tax payer, *responsible* burning should come with training. Those who want to carry out burns should be required to provide “proof of competence” as part of a strengthening of the system.
- The Heather and Grass Burning Wales Code for Wales need to be updated. In addition to burning, it should incorporate references to all methods of vegetation control, including grazing, cutting, mowing, planting and rewetting/ peatland restoration.
- While it is recognised that “one-voice” messaging can be beneficial, we strongly recommend that the Wales Wildfire Board’s wildfire prevention work should include the promotion of *all* land management methods which contribute to reducing wildfire risk. There should be a greater emphasis on vegetation management methods such as rewetting, conservation grazing and cutting. ‘Burn to Protect’ should not be the only official advice being given to land managers.

- Public awareness campaigns are needed in the winter and during early spring months, prior to the most impactful wildfire events. This will encourage the public and responsible burners to report grassland fires and to put pressure on those land managers who consistently flout the law.
- There should be no land management burning over any depth of peat in Wales.
- Permitted burning dates should be subject to periodical review because climate change affects phenological patterns and birds (and other wildlife) begin to breed earlier.

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