

Approach to beaver reintroduction and management in England

Wildlife & Countryside Link response to Defra consultation

November 2021

[Wildlife and Countryside Link](#) (Link) is the largest environment and wildlife coalition in England, bringing together 62 organisations to use their strong joint voice for the protection of nature.

Introduction

- We welcome this consultation from the Department of the Environment, Food and Rural Affairs, and the proposals it advances for further managed releases of beavers into the wild.
- We have provided responses to the questions where the expertise of our members can add relevant evidence and suggest useful enhancement to the core proposals. Our responses to consultation questions, drawn from members of Link's Nature & Wellbeing and Blueprint for Water groups include the following recommendations:
 - That the requirement for evidence of long-term funding be included within each release application is softened, to prevent hard-to-meet funding criteria becoming a barrier to reintroductions.
 - That beaver reintroduction project plans be required to include consideration of the impact of reintroduction on local habitats.
 - That beaver reintroduction project plans be required to closely align with Local Nature Recovery Strategies and other local nature plans.
 - That targeted support be provided to unlock tourism benefits from beaver reintroductions, informing wider approaches to rewilding as a way of boosting rural economies.
- These recommendations are made in the context of enthusiastic Link support for beaver reintroductions. Our nature is in decline, 0% of river, lakes and streams are classed as in good health in England and flooding events are on the up. Twenty years of evidence show that beavers can thrive in UK habitats; improving their biodiversity, cleaning water ecosystems and providing natural flood management. Beaver reintroductions will help unlock these benefits and contribute towards nature's recovery. Our recommendations are made to maximise these benefits.

Response to consultation questions

Question 6: Do you agree or disagree with the proposed approach to beaver reintroductions?

Please state your reasons and supporting evidence.

- Link agrees with the proposed approach to beaver reintroductions. A licensing system for beaver reintroduction applications will allow applications to be considered on a case-by-case basis. This case-by-case assessment is necessary, as the impact of beaver reintroductions will vary place to place.
- This is an appropriate time for the progression of a considered approach to beaver reintroductions. Natural England has amassed twenty years of research on beaver reintroductions, including the five-year River Otter trial. The body of academic literature on

beaver impacts is also now sizeable, featuring UK specific research drawn from Scottish reintroductions¹ and a feasibility and acceptability study for reintroductions of beaver populations to England.² Based on this research, Natural England has concluded that beaver reintroductions offer biodiversity³, pollution⁴, flooding⁵ and community⁶ benefits and has recommended that beavers be introduced at a measured pace to locations where their impact can be measured.⁷ The licensing approach set out in the consultation would deliver on this recommendation, drawn from two decades of research.

- Whilst the fundamentals of the proposed licensing system are sound, Link agrees with Rewilding Britain⁸ that amendment to the funding requirements are required to ensure it the system is accessible. The requirement to provide evidence of 5-10 years funding to cover the reintroduction will be hard for many to meet, especially the wildlife charities that are likely to submit applications. Three years is the usual duration of a nature conservation grant and applicants will struggle to secure funding for a longer period. This financial barrier could become an effective bar on the majority of applications, preventing reintroduction happening on any significant scale.
- We propose that the requirement be modified to require only evidence of a multi-year funding commitment (rather than a 5-10 year one), with the option to submit further evidence of long-term commitment to financial support from an environmental NGO and/or the landowner.
- The financial barriers to applying could be further lowered by making it clear that the Environmental Land Management scheme (ELM) will financially support landowners who are willing to allow beavers to provide "public goods" such as reduced flood risk and improved water quality on their land. Similarly, clarification is required that the reintroduction partnership's responsibility for managing financial impacts of beaver activity does not extend to liability for reparations for third party losses which arise from beaver activity, or for the spread of beavers into other catchments. Finally, it should be acknowledged that applicants will only be able to provide general estimates of costs and benefits to the local economy from a beaver reintroduction, rather than a detailed breakdown, as the very limited scale of previous reintroductions provides little in the way of economic precedent.

Question 7: What criteria, in addition to those listed above, do you think projects should meet to be granted a licence for wild release?

- We recommend an extra stipulation for project plans, which should show evidence of active and sustained engagement with the relevant Local Nature Recovery Strategy (LNRS). The

¹ For example, see this 2021 paper on beaver impacts on migratory fish: https://beavertrust.org/wp-content/uploads/2021/10/Needham_et_al-2021-Canadian-Journal-of-Fisheries-and-Aquatic-Sciences.pdf

² [The feasibility and acceptability of reintroducing the European beaver to England - NECR002 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk)

³ https://beavertrust.org/wp-content/uploads/2020/07/Wilby_et_al-2018-Phil_Trans_B_2018.pdf

⁴ <https://onlinelibrary.wiley.com/doi/full/10.1002/esp.4398>

⁵ https://beavertrust.org/wp-content/uploads/2021/02/Puttock_et_al-Hydrological-Processes-2020.pdf

⁶ https://beavertrust.org/wp-content/uploads/2020/12/Auster_et_al-2020-Journal-for-Nature-Conservation.pdf

⁷ <http://nepubprod.appspot.com/publication/5010277084168192>

⁸ <https://www.rewildingbritain.org.uk/news-and-views/policy-statements/beaver-consultation>

Environment Act requires authorities to prepare a LNRS to state local biodiversity priorities and provide a habitat map, identifying areas that could contribute to environmental improvement. These strategies will bring together different policies and mechanisms and enable local expertise to coordinate habitat protection, restoration and creation at a local level. Beaver reintroductions should be integrated into these strategies, to ensure they contribute to nature's recovery. Close integration with LNRSs will also allow the impacts of beaver reintroduction projects to be assessed with reference to other species and habitats. The current requirement to show stakeholder engagement as part of a beaver reintroduction application should be bolstered by a specific requirement to show co-ordinated working with the relevant LNRS.

- Project plans should also show evidence of engagement with other relevant local nature and water environment plans, including catchment management plans, river basin management plans, flood risk management plans and natural flood management research projects.
- The requirement for project plans to show consideration of risks to protected areas, heritage sites and species should be bolstered by a further habitats consideration. A key UK study, 'The impacts of beavers *Castor spp.* on biodiversity and the ecological basis for their reintroduction to Scotland, UK' (2016) found that although "*overall, beavers have an overwhelmingly positive influence on biodiversity*"⁹ they can cause damage to some habitats.
- Some riparian woodland habitats are particularly vulnerable, with the 2016 paper noting that beavers "*can reduce the extent of old-growth riparian woodland communities, or shift the age structure of a woodland towards younger growth*". Aspen woodland is especially vulnerable to potential damage from beaver populations.¹⁰ Aspen woodland is one of the rarest riverine woodland habitat types in the UK. More species of animal associated with aspen have gone extinct in the UK than any other tree species. Several insects associated with aspen growth and deadwood are highly endangered. Link recommends a significant effort to restore thousands of hectares of aspen woodland to create sustainable habitats for the endangered species that rely on them and to mitigate any potential impacts from beavers.
- Similarly, there are risks associated with beaver introduction into areas of species rich grasslands, such as floodplain meadows. Link recommends further research into the impact of beaver introductions on floodplain meadow SSSI's, and the role beavers can play (including positive effects) in the re-naturalisation and improvement of wider floodplain habitats.
- As made clear in the above, there may be a limited number of locations where beaver reintroductions are not appropriate due to habitat impacts. These impacted habitats may not be covered by protective designations and as such each project plan should be required to include a section on the impact of beaver reintroduction on local habitats, in addition to impacts on any specific protected areas.

Question 8: Do you agree or disagree with the proposed approach to existing wild-living beaver populations?

- Link agrees with the proposed approach to existing wild-living beaver populations. In the absence of evidence of harms, there is a clear ethical imperative not to disrupt the lives of

⁹ https://beavertrust.org/wp-content/uploads/2020/06/Stringer_et_al-2016-Mammal_Review.pdf

¹⁰ <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/a-z-of-british-trees/aspen/>

established wild populations. The proposed approach would prevent such disruption to wild living beavers, whilst encouraging local partnerships to form to assess and better manage the beaver presence. Given high public support for beaver reintroduction (standing at over 60% in a recent YouGov poll¹¹) we expect there to be considerable local interest in and support for partnership work in places where the presence of wild-living beavers can be confirmed.

- The suspected presence of wild-living beaver populations in five sites in England illustrates the need for better environmental data mapping. Natural England has acknowledged that *“in the absence of comprehensive surveys our understanding of beaver status, particularly in the new and emerging populations, relies heavily on the passive collection of sightings and not structured surveys”*.¹²
- As part of its work on beaver reintroduction, the Government should respond to this data gap and consider the case for resourcing a centralised environmental data infrastructure, drawing on the work of the Catchment Based Approach Data Hub, Local Environmental Record Centres and the National Biodiversity Network. A sufficiently resourced centralised environmental database would allow for the locations of wild-living beaver populations to be recorded with more confidence and enable a fuller assessment of relationships between these populations and other species.

Q9: Do you agree or disagree with the proposed approach to licensing of future beaver enclosures?

- Link agrees with Rewilding Britain¹³ that the licensing system for beaver enclosures should be made as accessible as possible in the short term, given the benefits that these enclosures will provide to aid wild reintroductions. The benefits include providing genetic diversity for future wild releases and providing tourism and education opportunities for the communities hosting enclosures. In the long term, the beaver population should be a fully wild one, but enclosures will play an important transitional role.

Q11: Does the management hierarchy cover management actions you would expect? Are there additional aspects that you think should be included in the management hierarchy?

- The proposed management hierarchy, based on an avoid-mitigate-remove pathway, is focussed on guiding landowners to avoid negative impacts from beavers on their land. Whilst such a hierarchy is required, it does not cover any interest from landowners in encouraging beavers to take up residence on their land and to support their presence there. The framework for managing negative impacts should be complemented by guidance for landowners wishing to encourage and actively support beaver populations. Given the popular interest in beavers, and

¹¹ <https://yougov.co.uk/topics/science/articles-reports/2020/01/28/third-brits-would-reintroduce-wolves-and-lynxes-uk>

¹² <http://nepubprod.appspot.com/publication/5363285194178560> p35

¹³ <https://www.rewildingbritain.org.uk/news-and-views/policy-statements/beaver-consultation>

the benefits that accrued to the local community from the River Otter trial, we can expect there to be high demand from landowners for such guidance.¹⁴

Q12: Excluding direct payment for management activities, what other support do you think should be available and to whom?

- Given the important role that LNRSs will play in tying beaver introductions into wider nature recovery efforts, consideration should be given to providing resources to facilitate communication and joint work between LNRSs and beaver reintroduction project steering groups. Resourcing to support this joint work would allow data to be shared throughout the active management time period of beaver reintroductions, and to be collected, stored and used in the long term through the LNRS process.
- As set out in Rewilding Britain's recent report 'Rewilding and the rural economy', species reintroduction projects can "*attract visitors and spending in the area, creating new businesses and employment opportunities within the wider economy*".¹⁵ Support should be provided to local communities keen to explore the economic benefits stemming from beaver reintroductions, whilst also encouraging such tourism to be responsible and to put the needs of beavers first. Outcomes from this support could expand the (currently limited) evidence base on the impact of reintroductions on the local economy and inform wider work to grow responsible nature tourism in England, potentially providing significant potential benefits to rural communities. The scale of this potential is illustrated by the already established nature tourism industry in Scotland, which is estimated to attract visitor spending of £1.4 billion per year, with 39,000 associated jobs.¹⁶
- The consultation document suggests that Defra will consider facilitating the creation of beaver management groups. This would be welcome, and it should be confirmed that this will involve direct government funding for some beaver management officer roles. Further clarification that beaver management officers can cover multiple beaver management groups (this is implied but not confirmed in the consultation document) would also be useful and would help reduce the financial barriers to reintroductions.
- The Catchment Based Approach (CaBA) National Support Group (NSG) have suggested that the Beaver Management Groups should join the CaBA Catchment Partnerships covering England as a point of liaison with local communities and stakeholders. Any presence or proposed introductions of Beavers and management implications may then be included in regular consultations and included in the CaBA Catchment Management Plan (which feeds into the River Basin Management Plans via the "Catchment Pages").

Q13. Are there any specific areas where guidance is required? Please provide details.

¹⁴ See 2020 Guardian story 'Estate owners across UK queue up to reintroduce beavers'

<https://www.theguardian.com/environment/2020/feb/01/beavers-uk-estate-owners-reintroduction-conservation-flooding>

¹⁵ <https://s3.eu-west-2.amazonaws.com/assets.rewildingbritain.org.uk/documents/nature-based-economies-rewilding-britain.pdf> p11

¹⁶ http://www.outdoorrecreationni.com/wp-content/uploads/2015/11/Assessing-the-economic-impacts-of-nature-based-tourism-in-Scotland_Scottish-Natural-Heritage-2010.pdf

- A central England beaver support group should be established, possibly supported through one or more of the specialist NGOs, e.g. CaBA National Support Group, River Restoration Centre, Beaver Trust, etc. This central group could share information, training, management strategy and best practice, reducing the costs to individual projects. It could also provide general information on beavers to riparian interests in areas without beaver projects.
- Funding is needed to develop the following advice resources:
 - A training or certification for beaver officers and workers, including staff within Defra or council teams whose work will be affected by a new protected species being present in rivers.
 - Special advice to forestry and agricultural industry and advisors
 - Special advice for river restoration and management.
 - Guidance for those working on and reviewing existing river restoration plans.

For questions or further information please contact:

Matt Browne, Advocacy Lead, Wildlife and Countryside Link

T: 020 8078 3586

E: matt@wcl.org.uk

This response is not confidential.

This response is supported by the following Link members:

Buglife

Friends of the Earth England

Naturewatch Foundation

Peoples Trust for Endangered Species

Rewilding Britain

RSPB

The Rivers Trust

Wild Justice