

DEFRA CONSULTATION ON APPROACH TO BEAVER REINTRODUCTION AND MANAGEMENT IN ENGLAND

Q5. Please briefly describe your interest in the consultation.

The Wiltshire Fishery Association (WFA) safeguards and promotes the interests of its members be they fishery owners, lessees or individual anglers on the Salisbury Avon and its tributaries upstream of the junction with the River Ebbles. In doing this, the Association acts as a co-ordinating body, a disseminator of information, a focal point for consultation by DEFRA and the appointed Agencies, together with an information and advice source for local anglers.

The WFA cooperates with a number of NGOs, societies and bodies having similar objectives and may from time to time provide donations to protect fisheries or to facilitate research.

The WFA welcomes the designations of SSSI and SAC which apply to the rivers of the Salisbury Avon catchment with the exception of the Ebbles. The WFA works closely with DEFRA, the Environment Agency, Natural England, the Wessex Rivers Trust and the Wiltshire Wildlife Trust to bring these rivers to favourable condition and maintain them as such, thereby safeguarding both fishery and broader conservation interests.

The WFA is in the first instance is pro-fish. This does not mean that we are anti-beaver, since we believe that there are circumstances where their presence may be beneficial. However, we have particular concerns for the sensitive nature of the chalk stream environment which is already under considerable stress from pollution, abstraction and an historic legacy of man-made barriers to fish migration. The majority of chalk streams are highly engineered environments which have been historically managed for human use including power for milling and water meadows. Those involved in chalk river restoration and management have been working hard to remove barriers and improve access, both upstream and downstream for migrating fish along with other species. All freshwater fish need to migrate to at least some extent during their life cycle; not just salmon and sea trout. We are concerned that the efforts made to date and involving considerable sums in land-owner, charitable and government funding should not be put at risk from the re-introduction of beavers.

We wrote to the Secretary of State for the Environment in January this year to to emphasise the unique nature of the chalk streams and to express our concerns.

We believe there is a need:

- For proper, objective, scientific assessment of the potential impact on the chalk river habitats as a whole as well as designated and undesignated species BEFORE applications for licences to reintroduce beavers are considered
- To allow mechanisms for timely management intervention if and when things go wrong, without the need for lengthy bureaucratic processes.
- To fully engage with and to take into account the views of river owners, fishery owners and managers when applications for beaver reintroductions are considered

We are aligned with Salmon and Trout UK's position but also we would add that there are already a great many pressures facing the chalk streams, our globally unique ecosystems, so they need to be managed extremely carefully.

We believe discussions around beaver reintroductions must take into account the potential risks to existing species, of which native fish populations are on the frontline. Beavers are ecosystem engineers- they modify habitats, so there will be winners and losers resulting from their actions. We need more detailed evidence and studies to demonstrate that already threatened and protected salmonid populations and their habitats will not be the losers.

Q6. Do you agree or disagree with the proposed approach to beaver reintroductions? Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.

Disagree.

We agree the scientific literature demonstrates beavers can bring positive benefits to the ecology of some watercourses. They can have positive impacts on geomorphology, nutrients, sediment, biodiversity, and could help offer flood protection in vulnerable areas. Conversely, there are also risks. Beavers could adversely affect some environmental issues important to fisheries and the functioning of chalk river ecosystems and impair fish movement, including migration routes to and from spawning and juvenile habitats for threatened salmonid populations. The Atlantic salmon is already protected under European legislation (now integrated into UK law) and it is our obligation to support those who restore and conserve these native populations as an urgent priority.

We are also concerned about the potential impact beaver dams and increased water temperatures might have on grayling populations, that we know are already struggling, in some parts of the Avon catchment (Marsh et al, 2021) We, therefore, do not believe the proposed plan goes far enough to meet the objectives stated.

We agree funding should be in place to cover all aspects of reintroduction. This should be ring-fenced before licences are granted. We also support the need for strong, local Project Steering Groups (including fish conservation interests) with appropriately trained, and licenced beaver officers.

However, we believe a project-based approach alone is inappropriate. There must be a fully funded national strategy and management framework to beaver reintroduction in England. Significant Government funding will be essential.

We do not believe 5-10 years of project plans and funding is sufficient time. The scientific papers describe beaver population expansion on a multi-decadal scale and thus it is very likely that the risks identified in para 60, and the management needs, will not be fully realised within 5-10 years, so this period needs extending.

It is vital we have more scientific research carried out that specifically relates to the chalk streams of southern England, or better still, the Hampshire Avon catchment.

Q7. What criteria, in addition to those listed above, do you think projects should meet to be granted a licence for wild release? Please state your reasons and supporting evidence.

There must be a mechanism in place, for example a Class licence, which allows a suitably qualified person to undertake rapid management action where conflicts arise or adverse impacts are realised, such as beaver dams impeding the movement, migration and/or spawning of all fish species – whether they are protected species or not. In the example of fish passage, the authorised person would need to be a fisheries specialist. The Prof Cowx paper highlights fish passage is time critical, especially in times of low flow, so rapid legally permitted action would be essential to remove or modify beaver-made barriers if they are found to inhibit fish movements.

- There must be a robust strategy that mitigates for project failure from, for example, lack of funding or lack of stakeholder agreement.
- There must be an entity to oversee governance of beaver reintroduction and to hold each project accountable.
- We also believe projects should demonstrate mitigation of risk to unique salmon, trout and grayling populations, either genetically distinct populations or those reliant on headwaters, coastal or inlet/outlet lake streams, where beaver dams may impact various stages of the life cycle of the fish and thus the sustainability of the population.

Q8. Do you agree or disagree with the proposed approach to existing wild-living beaver populations? Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.

Disagree

We believe the proposed approach, to effectively authorise illegal release of animals, is contrary to established principles of wildlife management and other animal release programmes in England such as the permitted stocking of native fish species to rivers. This proposal will totally undermine the ambition in the plan to ensure “only high-quality projects are permitted” and could condone illegal activity.

We feel a government funded population assessment across England should be carried out.

We accept that by restoring England’s beaver population the government could save money from ecosystem services beaver provide, however, this proposal fails to mention who will manage these populations and who will pay for that management?

Q9. Do you agree or disagree with the proposed approach to licensing of future beaver enclosures? Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.

Disagree

Beavers in enclosures may be useful in engagement/education of local stakeholders as well as providing some contribution to the understanding of their behaviour. However, they may impede the free passage of fish and cannot demonstrate catchment-scale benefits. They will also contribute little to the knowledge of the impacts on wild fish movements.

Q10. What criteria do you think should be taken into consideration when determining whether or not to issue an enclosure licence?

We accept that a wild introduction may be the only way forward for gathering scientific evidence specific to chalk streams, which is currently lacking, however, we do not see a licenced enclosure in a chalk stream as offering anything new.

With regards to licenced wild introductions, we would like to see a consistent application process that includes a detailed assessment of risk and management responsibilities. Licence applications should allow plenty of time for engagement and consultation with fisheries interests. Decisions on granting (or not granting) licences should be taken at a local level.

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? Please provide further details.

We support Defra's recognition of the need to manage beavers in the landscape. This must be rapid, responsive and unbiased for those species who may be impacted by beaver activity, e.g. migratory salmonids. We believe management can be most effective **without granting beavers European Protected Status (EPS)**, because:

- Science and experience points very firmly to the need to move away from single species protection legislation in favour of holistic protection of the habitat/ecosystem of which that species is a part. Even the European Beaver does not live in isolation.
- EPS will greatly restrict rapid, responsive and effective management to protect other protected species, such as Atlantic salmon- a potential risk which is recognised in the Natural England literature review. This review recognises juvenile fish dispersal will be impeded by beaver dams, when dispersal periods coincide with low flow events, and upstream spawning migration of fish will be interrupted if or when high water does not coincide with migrations. In these situations, rapid identification and management of problematical dams is essential to mitigate impacts. If beavers are protected and a licence is required for such interventions, the current 60 working day application process time of Natural England will result in detrimental impacts on other protected species- e.g. Atlantic salmon. This would obviously be illogical.
- wild beaver populations in England and Scotland are displaying evidence of growth and increased distribution according to the Natural England literature review. Therefore, there is no current need for EPS. The UK Government is in the process of rewriting post-Brexit legislation so presumably choices can be made.

If EPS does proceed, which we disagree with, the hierarchy must consider:

- the overlap of the beaver kit dependency period (KDP, defined in Scotland as 1 April to 16 August) and the spring juvenile dispersal period of Atlantic salmon and trout. If the example from Scotland is followed and priority given to KDP, management intervention aimed at easing fish passage will be impossible and will impact fish populations.
- The overlap of the beaver kit dependency period (KDP, defined in Scotland as 1 April to 16 August) and the spring spawning period of grayling. If priority is given to KDP, management aimed at easing fish movement and improving spawning habitats and opportunities for grayling recruitment, and juvenile survival (Marsh et al, 2021) will be impossible and will impact fish populations.
- Excluding beaver dams and their modification from any protected environment, unless associated with a natal lodge. Dams are not used by beavers as breeding sites (unless, in

rare occasions they are associated with a natal lodge) or resting places. If dams (except those associated with natal lodges) are excluded from any licensing framework, management intervention (seasonal lowering, notching etc) to minimise impacts on fish migration could be rapid, responsive, and effective. This is vital in reducing the impact on already vulnerable salmonid populations and other chalk stream fish species.

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

Government policy to “consider facilitating the creation of management groups around existing beaver populations to help manage impacts” is weak and non-committal. We share the view of many NGOs that a national strategy, adequately funded by Government, is vital if beaver reintroduction is to succeed. The strategy and its funding must look to the multi-decadal scale, and not an arbitrary 5- 10 years.

We believe much of this cost could be absorbed into the licencing function of the Environment Agency and that the training could be carried out at relatively low cost, in-house, with Environment Agency fisheries specialists being appointed to the role of Beaver Officer on a catchment scale.

The role of Beaver Officer must be directly funded by government with the costs absorbed into existing regulatory infrastructure and management – with appropriate expert training provided.

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

Guidance and expert knowledge (for example from the Salmon and Trout Conservation UK, Wild Trout Trust and/or Grayling Research Trust) in fish ecology, including the needs of wild fish populations during times of migration, spawning and juvenile dispersal, is essential to inform those leading the beaver reintroduction programme.

Q14: How would you prefer to access advice and guidance (e.g. information on website, via email, focal point for enquiries etc)?

We believe the best approach would be to set up a dedicated government website where we can access information and engage through a stakeholder forum

Q15: Would you (or an organisation you are involved with) consider preparing an application for wild release, if the approach proposed on this consultation became national policy? If yes, please provide the general location where you might consider applying for such a release.

No in response – However, we are prepared to use our expertise to help build climate-change resilient landscapes and tackle the biodiversity crisis. We are prepared to support local communities to achieve this but believe the conditions set out in this consultation are not suited to chalk rivers.

We believe a detailed management framework that is specific to chalk rivers will greatly assist stakeholder engagement – We are happy to be involved in this process.

