



## DEFRA CONSULTATION ON APPROACH TO BEAVER REINTRODUCTION AND MANAGEMENT IN ENGLAND

### Summary

1. Based on the experience of release projects in other countries and other parts of the UK, and our members' feedback The CLA believes that a robust licensing system is needed for the release of wild beaver populations into the English landscape. Reintroduction projects should not be undertaken lightly. Licence applications should be accompanied by a full cost-benefit analysis, success criteria, project milestones and an exit strategy. All stages of the licence application and project implementation should involve extensive engagement with farmers, landowners and land managers in the local area.
2. **Risks and benefits from beaver populations are unevenly spread.** While there may be overall benefits to the environment, economy and society from beaver reintroductions, some people, and this is likely to include many CLA members, will bear the negative impact of reintroductions. For example, a beaver population may lead to a general reduction in flood risk downstream and increased biodiversity overall, but this could be at the expense of some localised flooding of low-lying agricultural land and damage to nearby trees. Long term successful reintroduction of beavers will require these risks and benefits to be more evenly distributed. There is a role for Government to help do this, for example through Environmental Land Management schemes.
3. **Long-term, well-planned management of reintroductions is critical to minimise risk and address concerns.** The evidence shows that negative impacts can often be avoided through good management. However, this relies on the right policies and their implementation on the ground. The risk is that, following a reintroduction, the necessary management to mitigate negative impacts does not actually occur, for example due to lack of funding or local governance failures, or is stopped too early for the same reasons. All projects must include an exit strategy and the ability to use lethal control when nothing else works.
4. Because both the evaluation of the River Otter Beaver Trial and the national review of evidence showed that the benefits outweigh the costs, there is tendency to see the case for beavers as having been made. This is not the case in all situations; even where it is, there will be winners and losers; and the overall result will depend on strong local management.

### Consultation questions and draft CLA response

**Q1. *Would you like your response to be confidential?***

No

**Q2. *What is your name***

Harry Greenfield



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### **Q3. What is your email address**

[Harry.greenfield@cla.org.uk](mailto:Harry.greenfield@cla.org.uk)

### **Q4. What is your organisation?**

Country Land and Business Association (CLA)

### **Q5. Please briefly describe your interest in the consultation**

5. The Country Land and Business Association (CLA) is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners, and those with an economic, social and environmental interest in rural land. Our members own or manage around half the rural land in England and Wales and more than 250 different types of businesses.
6. Our interest in the consultation stems from the fact that landowners and land managers are likely to be involved and impacted by the release of beavers, both in the wild and in enclosures. Some members will be likely to take part in projects to reintroduce beavers and many more are likely to be affected by releases that occur on or near the land they manage.
7. The CLA was a member of the River Otter Beaver Trial steering group and has taken a close interest in the development of this project, which has informed our response to the consultation. We have also consulted widely with members, including those with experience of wild or enclosed beaver populations.

## **National approach to reintroductions**

### **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.**

8. The CLA agrees with the use of a licencing system for beaver reintroductions. This will allow an appraisal of the balance of benefits and risks; provide transparency; allow for consultation with key stakeholders, especially landowners and land managers; and ensure that action can be taken if problems arise.
9. We are aware that there is a risk that an overly burdensome licencing process may lead to an increase in unlicensed releases, with less stringent (if any) management systems. We therefore want to strike a balance between the need for a robust licencing regime that avoids negative impacts and the risk that unnecessary or unachievable bureaucratic hurdles could lead to people rejecting the process entirely.
10. We agree with the use of the Code of Best Practice, especially Principle 7 ('Consider societal benefits and minimise conflict with others') and Principle 8 ('Show accountability, transparency and openness') of the Code. The CLA also supports the criteria listed in the consultation, including a guarantee of project funding for a long time period, consultation with landowners and land managers, a Project Steering Group and Local Beaver Officer.



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11. Our experience on the Steering Group for the River Otter Beaver Trial demonstrated the importance of these elements to provide certainty and accountability. The Trial did result in the general acceptance of beavers in the catchment but this was a result of the work of the Steering Group and project officers, and the availability of funding to deal with problems. In the absence of these elements the risk of conflict between beavers and people would rise.
12. The CLA remains concerned about the long-term and irreversible nature of beaver reintroductions. The general approach set out in the consultation is to manage concerns and risks at the beginning stages of a reintroduction project, and to continue to do so for up to 10 years. This is welcome, but the CLA believes that 10 years should be the minimum length of any management plan. The assumption that risks will diminish over time and that people will learn to live with beavers does not appear to have been tested and is not guaranteed in all cases.
13. The introduction of a new species, especially one with no obvious predators, will mean that management by humans will always be necessary. This also means that monitoring of beaver populations, especially in the early years, will be vital. Use of tracking and DNA technology could help achieve this in a cost effective way, helping to build up a picture of how beavers move through the landscape and what their impacts are. We believe any licence application should include a minimum standard of monitoring over the 10 year period.
14. In some parts of the country, beaver populations may become established and be welcomed locally with minimal negative impacts. In other situations, however, it will be harder to achieve such harmony between beavers and local communities. This could be for a number of reasons: negative impacts increase over time; new problems arise (for example due to changes in land use or climate); resources available for beaver management decline; flaws in the original application or beaver populations increasing beyond sustainable levels. It is very likely that the full range of impacts from beaver populations will not be apparent until well into the future. Experience from other European countries has shown that after several decades of growing beaver populations, new or unexpected negative impacts can arise.
15. In all situations the CLA is in favour of a clear exit strategy being available at the local level. Some beaver projects will be thriving, but for those that, in the light of practical experience, would be better off abandoned or reevaluated, beaver reintroduction must be allowed to be reversed.
16. We would also like to highlight the importance of good communication and engagement at all stages of a reintroduction proposal, especially with landowners. Species reintroduction projects, which often attract a great deal of public attention and debate, can be the victim of misinformation and misunderstanding on both sides. Proponents may overstate the benefits in order to make the case for a project; while those opposed may exaggerate the risks. The solution is to ensure decisions are based on rigorous scientific evidence and sustained engagement with all stakeholders.
17. Acknowledging the potential for negative impacts and explaining how they will be dealt with is essential. Land managers will want to hear that a process is in place to deal with any problems, rather than reassurances that such risks are minimal. Much harm can be done by ignoring or dismissing landowner concerns and being seen to believe that the presumed greater good of beavers should prevail over the concerns of local people.



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18. While the criteria require evidence of engagement with landowners, more detail on this is needed. In the CLA's experience, engagement or consultation can become a mere box-ticking exercise, rather than a genuine canvassing of opinion. A high level of support for beaver reintroduction from the population at large may mask the fact that there are certain stakeholders who will be disproportionately impacted. We also have experience of species reintroduction projects that have engaged well with local land managers, often when the project is led by landowners as opposed to other organisations.

***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.***

19. Projects must have clear milestones of success; criteria for failure and an exit strategy in place. This should allow for beavers to be removed or discouraged from populating a catchment when the situation demands. The exit strategy needs to be communicated publicly in advance, so that should it be called upon, it is not met with public opposition from those who believe that no set of circumstances should result in the removal or lethal control of beavers.

20. The CLA would support a natural capital approach to planning beaver reintroductions, as suggested in the Code of Best Practice. If done at the outset, when planning a reintroduction, this could help show the benefits and risks of the project and go some way to helping ensure that these are distributed fairly and clearly.

21. There are likely to be tensions between different management objectives, for example beavers could interfere with drainage, flood defence and water management infrastructure. For example, the presence of beavers could lead to more intensive, engineered infrastructure (such as drainage or flood defences) built to withstand potential. This goes against the trend for gentler, low impact approaches to water management.

22. Defra or Natural England should promote the use of a cost-benefit calculator or other tool to quantify and appraise the positive and negative impacts of beavers in a landscape. This could be used to show that for certain land uses and with beaver populations above a certain threshold, the impact is more than it is reasonable for a landowner to bear without intervention. This could measure impacts such as flooding of land; destruction of trees and impacts on the wider environment. A cost-benefit analysis could also help to underwrite the costs and risks of a project, for example by encouraging those developing a reintroduction project to seek revenue sources from those that benefit from beavers' presence and use these to fund management, public liability insurance and potentially compensation for damage caused by beavers.

23. The CLA also believes that any proposed reintroduction should be in line with the priorities listed in a Local Nature Recovery Strategy and should not conflict with any other local priorities.

24. Any proposed reintroduction must ensure a high level of engagement with local land managers, to give an opportunity for mutual understanding to develop between those proposing the project and those who it will affect on the ground. This should be conducted with set consultation periods and processes, as is done in the planning process. We suggest that a reintroduction project should be required to publicise their proposal and to conduct public meetings where views can be heard. There should be a



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minimum period of 12 weeks during which a fully detailed proposal can be viewed and discussed by the public. A mechanism for seeking views of the public, for example an online survey or mailbox, should be included, with contact details of the project team to allow for discussion with land managers and others with an interest or questions.

25. We also believe that the initiator of the reintroduction should be required to have public liability insurance in perpetuity to cover any damage caused by beavers. This would help cover the costs of damage to property caused by beavers and would ensure there was financial accountability for their presence.

## Existing wild-living beaver populations

***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.***

26. The CLA believes that a more robust process should be introduced, both to evaluate whether beavers should remain in these catchments and to fund and establish governance systems to deal with their presence. This should include a monitoring and management programme for a 10 year period, funded by Government, to ensure wild-living populations achieve the same level of co-existence and acceptance locally as those released under licence. As a minimum, the Government should invest time and resources into engaging local people, communicating the situation and funding basic management as would be the case for a new legal reintroduction.
27. While removing these populations may not be desirable or practical, we are concerned that this will create a form of moral hazard. By treating beavers that result from escapes or illegal releases with less rigorous management requirements, this may encourage actors in the future to pursue this route.
28. The consultation does not explain in detail how future illegal reintroductions will be dealt with. As beaver populations increase and spread, both naturally and through licenced reintroduction, the temptation may be for some to try to speed up the process. The CLA would like to see any future unlicensed reintroduction treated very seriously, so as not to make a mockery of the Government's attempt to put in place the rigorous application system and management that we believe is necessary. Enforcement options should be set down in law to ensure no unauthorised movement of beavers into new catchments or locations.

## Current and Future beaver enclosures

***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.***

29. The CLA agrees with the proposal to tighten the requirements and to show a clear public benefit of beaver enclosures. The current licencing regime requires the applicant to demonstrate how escapes will be prevented and what happens if they do occur. This is welcome, but it shows clearly that Natural England see this as a risk. The CLA agrees – our experience is that enclosed beavers can quickly become wild beavers due to escapes.



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30. We believe the precautionary principle should be applied and an assumption made that any enclosure has at least some risk that beavers will escape into the wild. Given this stance, we believe the current licencing regime for enclosures is deficient in the realm of consultation with local and neighbouring landowners and evaluation of the risk from beaver escapes.

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

31. For the reasons stated in answer to Q9, the CLA believes an enclosure licence should take account of the views and impacts on neighbouring land managers and businesses. This should include a risk assessment in the case that beavers were to escape and contingency plans for such an eventuality.

32. The CLA also believes there should be a requirement to publicise details of the application process before, during and after, including who the applicant is; how the project is planned and funded and a named contact who can be held accountable for any escapees or other negative impacts.

33. We also believe that there should be more rigorous monitoring and tracking requirements for beavers within enclosures. Radio tracking, for example, could help to retrieve escapees in a timely manner.

## **Management**

***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.***

34. The management hierarchy seems reasonable in principle; however this must be matched by its successful implementation in practice. The crucial point is how one moves through the hierarchy and who decides which approach is more appropriate in a given situation.

35. The CLA supports the use of beaver-free zones as a management technique. In some parts of the country, for example the Somerset Levels, beavers will not be an appropriate addition to the landscape. In such cases, tolerance and making space for beavers are also not appropriate. Spatial ecological and hydrological data should be used to determine which areas should be beaver free. Management in these areas would be treated differently, for example by moving more swiftly through the management hierarchy in those places.

36. The successful application of the management hierarchy will depend on the advice and resources available for any reintroduction project. Engagement with land managers early in the planning stage will allow them to identify opportunities for avoidance and toleration. Some of these may also have wider benefits, for example fitting into Environmental Land Management or natural capital plans.

37. Land managers will find it easier to use legal methods of management if there is support and advice available on how to do this. A named point of contact must be available for when problems arise and resources available to deal with them. This could include protecting trees, improving water flow, modifying or removing dams and ultimately moving beavers away from sites where they are inappropriate.



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38. The CLA accepts that translocation and lethal control of beavers should only take place when other avenues have been exhausted; however where this is the case these options should be available quickly and easily. The concern for CLA members is that despite having attempted tolerance and legal methods, they are prevented by local pressure and slow administrative processes from exercising their right to use this management of last resort.
39. The decision making process for beaver management licences must be effectively administered and transparent. Decisions over whether the management hierarchy has been followed should not rely on subjective judgement. Instead, transparent criteria and risk or damage thresholds are needed to show when beavers need to be controlled. There will be situations when the negative impacts of beavers are high and need to be dealt with quickly and effectively.
40. Along with management of beavers, the CLA also believes that many reintroduction projects may result in an additional need to manage public access. Public interest in beavers and the ecology they create are recognised as a benefit of reintroductions, potentially resulting in beaver tourism opportunities. There is a risk, however, that as beavers spread beyond the original project area, an increased desire for public observation and access spreads with it. Plans should be put in place to support land managers to manage this and to ensure it does not lead to trespass or damage to either beaver habitat or private property.

## Government Policy and Support

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

41. The CLA welcomes the willingness of Government to invest resources, in the form of Natural England support, in managing the impacts of beavers. We question why direct financial compensation cannot be given for both management and any damage caused. This could go a long way towards encouraging a more benevolent attitude to beavers from land managers and would be equitable based on the evidence of the uneven distribution of costs and benefits from their presence.
42. Government advice and support, as well as that from non-governmental organisations undertaking reintroduction projects, should ensure that land managers are able to implement the management hierarchy. This means advice on how to deter beavers from causing damage and support from Local Beaver Officers to avoid or rectify any damage caused.
43. Given the public goods that beavers can deliver, financial support should be provided to land managers who create or maintain beaver habitat on their land. The Environmental Land Management (ELM) schemes should ensure that catchments where beavers have been or will be introduced are eligible for payments for riparian buffers, tree protection and wetland creation. This will help ensure that the land managers most affected by beavers are able to fund the necessary management and recoup any financial losses.
44. The CLA believes that the Government needs to produce a long-term National Beaver Management Strategy as soon as possible. If the processes outlined in this consultation are followed, the result will be a series of local management plans for specific beaver reintroduction projects. We believe these should last for 10 years but there is a lack of clarity over what happens beyond this time. These local project management plans



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should be placed within the wider context of a national strategy. National population monitoring should help identify the capacity of different landscapes and catchments to bear beaver populations. A national strategy would help to share best practice in management.

45. The national strategy should include education and awareness raising about how beavers fit into wider water and land management. As beaver populations grow in suitable catchments, management will need to adapt to their presence. While beavers can deliver a range of environmental benefits through ecosystem restoration, this may look very different to current projects to achieve these objectives. Businesses, environmentalists and public bodies will all need to consider updating their management approach in response to the presence of beavers.

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

46. The CLA would hope that beavers will not be reintroduced in sites where they are likely to have a negative impact on the local rural economy. However if this does happen there must be mechanisms and guidance in place to mitigate these negative impacts.
47. Guidance should be produced for those engaged in commercial forestry (including specific enterprises such as cricket bat willow and short rotation coppice), woodland management and those with commercial fishing and fishery interests. This would focus on how to identify the presence of beavers early on and any steps a business can take to minimise risk from beavers. Guidance should also signpost towards sources of advice from both public bodies and other groups.

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

48. Information on a website is important in the first instance but CLA members tend to value a focal point for enquiries, with quick response times and access to accurate information. Practical examples would also be helpful, for example how different types of rural business have adapted to co-exist with beavers in the landscape.

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

49. No

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**For further information please contact:**

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