



Call for evidence response

Call for Evidence: Species Reintroduction

Key points from the CLA on species reintroduction:

1. The CLA is supportive of species reintroductions to support ecological restoration where they are right for the local area, have the explicit support of those who may be affected, and are backed by a long-term management resources.
2. Plans for species reintroduction should be driven by evaluation of evidence of benefits and impacts, rather than by species abundance targets which is likely to have unintended consequences.
3. We have concerns about the ability to manage any problems arising from a species reintroduction, and the potential impacts on land and businesses outside the main release area. A more robust approach to prior consultation with affected land managers is essential, as is a transparent management strategy and monitoring. The CLA is calling for:
 - A minimum 12-week consultation period with all potentially affected land managers
 - The requirement for a Reintroduction Strategic Management Plan for each release
 - The creation of Local Reintroduction Management Boards through Natural England
4. A reintroduction should only be considered successful if the local community remains supportive over the long-term.
5. Reintroductions through the ELM schemes should have the same requirements for consultation and management under the species licence, as any other release. High risk species should only be released under the Landscape Recovery scheme.

Responses to specific questions posed in the Call for Evidence:

Q1: What role should species reintroductions play in the delivery of the government's biodiversity and nature recovery goals? Should specific objectives/targets be set for species reintroduction?

Reintroductions are an important part of nature recovery but they should be based on ecological need and local agreement

1. The reintroduction or translocation of a species could have profound effects (both positive and negative) on the ecosystem of the release area and surrounding landscape. Reintroductions are becoming an increasingly popular approach for ecological restoration;

however, they are not always the most appropriate response for a local area. They are one of many ecological approaches that can be used to transform a landscape, and should only be used where other conservation measures are unsuitable. Some of the most successful reintroduction projects in Europe have still come with complications, and demonstrate why a precautionary approach should be used.

2. The CLA cautions against national numerical targets for reintroductions, and instead recommends a case by case approach. This would allow for releases that contribute to nature recovery outcomes and ecological need, rather than simply meeting a target. It should be considered as one of a number of tools to increase species abundance. We would encourage focus on lower risk approaches and only reintroduce where there are clear benefits that outweigh the costs and risks and have full local support.
3. If reintroductions take place, they should be based on an assessment of the nature recovery priorities of a local area through Local Nature Recovery Strategies (LNRS), with the support of landowners and businesses affected, rather than on an arbitrary reintroduction number. This would support a natural capital approach to understand and value impacts of the projects on people and nature, and ensure the benefits outweigh the costs.
4. Evidence-based and adaptive reintroduction management processes should be in place for reintroductions, rather than rigid numerical targets. The environment, be it the landscapes, habitats, and species abundance and distribution, will not be the same as it was before a species went extinct. Reintroduced species do not exist in a silo; they influence and interact with their environment. Impacts of reintroductions will vary significantly depending on the species. Some could have minor impacts on very small areas while others could be “ecological engineers” that reshape a landscape and impact human activities. All will have, to some extent, impacts on local habitats, species, and local communities. Therefore, a flexible and adaptive approach is needed to respond to potential negative impacts in the short and long term.

There are other routes to increasing species abundance - habitat improvements

5. For the Government to achieve its target to halt species abundance decline by 2030 and ensure that species abundance in 2042 is at least 10% greater than 2030, the existence of suitable habitats is paramount. Many species have become endangered or have gone extinct due to lack of resources available (food and shelter) and external pressures on habitats. Therefore, increasing habitat type (peatland, woodland etc), habitat range (micro, semi-natural, etc), complexity, and connectivity for endangered species should be the priority. The abundance of insect indicator species, for example, is declining while

abundance of birds and mammals has stabilised¹. A key driver of insect decline is poor or unavailable habitat². Improvements in habitat would therefore be a more appropriate solution to increasing species abundance, and could then support some insect reintroductions, rather than prematurely reintroduced species into inadequate habitats.

6. There would be significant increases in biodiversity in designated landscapes if they were better managed, and the SSSIs within them kept in favourable condition. For example, in many upland National Parks (NPs) and Areas of Outstanding National Beauty (AONBs), there are blanket bogs and semi-natural grasslands supporting a wide variety threatened and rare plants, birds, and invertebrates. Were these landscapes in better condition, they would be able to deliver a much greater abundance of biodiversity and improved ecosystem services^{3,4}. It should be a prerequisite for habitats in designated areas to be in good condition prior to medium to high-risk reintroductions being considered, especially for large herbivores and carnivores.

Q2: How can the government maximise the potential benefits from species reintroduction, and ensure the correct species are reintroduced in the correct places?

Role of Local Nature Recovery Strategies (LNRS)

7. There is an important role for Local Nature Recovery Strategies (LNRSs) in species reintroduction. LNRSs should map and identify the best places for nature recovery, including possible reintroduction areas working in partnership with land managers. The CLA believes that reintroductions should not take place where there isn't consent from the affected landowners and a robust, evidence-based case for the need for the reintroduction for ecological benefits over other conservation measures. The LNRS could be used to inform the latter and to coordinate the stakeholder engagement.
8. For LNRSs to be a useful tool for species reintroductions, LAs need the capacity and skills to deliver them. Funding pressures mean that many local authorities have limited resources devoted to the environment. In addition, local authorities do not always have deep experience or understanding of the land management sector, with most land management policies delivered nationally. For this reason, we believe it is vital that central Government provide the financial resources, guidance and regulations to enable responsible authorities to fulfil this important role.

¹ Hayhow, D. et al. (2019). The State of Nature 2019. The State of Nature partnership.

² UK Parliament POST (2020) UK Insect Decline and Extinctions. POSTNOTE 619

³ Littlewood et al, (2010). Peatland Biodiversity: Scientific Review.

⁴ Meelis et al, (2005). Biodiversity in temperate European grasslands: origin and conservation. Grassland Science in Europe, 10

9. Additionally, information management, such as data collection and recording methods, and processes for priority setting need to be standardised across responsible authorities. A robust process for stakeholder engagement is also needed. A weak LNRS could be used to defend a reintroduction in an area where it may not actually be appropriate.
10. The CLA recognises there will be some local variation, but if the LNRSs are to inform Environmental Land Management schemes or be used as the basis for an application for a license for species reintroductions, then there must be consistency at a national level.

Establishment of a Land Management Advisory Board

11. The CLA also recommends that local authorities establish Land Manager Advisory Boards to provide a basis for meaningful engagement with land managers. An alternative is an ELM convenor as tested in the five LNRS pilots. LNRS should reflect local priorities, habitats, data and knowledge, and will therefore be most suited to guiding local landowners/farmers in receipt of ELM scheme funds and delivering public goods. Likewise, LNRS is uniquely placed to inform location, content, and suitability for potential reintroduction projects.

Q3: What role should the Landscape Recovery and Local Nature Recovery Schemes, under ELMS, have in supporting species reintroduction?

Licensing should be required under ELMS

12. The reintroduction of species through ELM schemes does not negate the need for a consultation process and a species licence, where the species in question would require one. Only once the consultation process with landowners is completed, and the species licence is granted, should an ELM scheme application for reintroduction be approved.

Countryside Stewardship plus

13. As the Countryside Stewardship Plus (CS plus) scheme (the current plan rather than Local Nature Recovery scheme) will be option based activities. It is the view of the CLA that reintroductions should not take place under this scheme. Reintroductions require a bespoke management plan and agreement, making CS plus unsuitable for the unique nature of individual reintroduction projects. The only exception may be for non-contentious reintroductions that are not expected to have wider impacts on other land managers.

Landscape Recovery scheme

14. Landscape Recovery agreements provide the opportunity for a bottom-up approach to reintroduction that is landowner-led. However, even with landowner approval, the question remains of where resources will come from for managing conflicts over time. While ELM schemes could provide funding for the initial period of the project, when the scheme is completed, there will still be a need for funding for ongoing species management. Before

reintroductions are considered, central Government must develop plans for a permanent species reintroduction management fund to follow ELM funding.

15. Landscape Recovery agreements will generally be longer term (up to 30 years) and will cover much larger areas (minimum 500 ha). This may be appropriate for the reintroduction of medium to high risk species, such as keystone species, apex predators, ecosystem engineers etc. This should be subject to all the standard licence agreement requirements. There is an element of uncertainty around how far the species will spread, making the larger areas under LR a more suitable option.

Exit Strategy for Unsuccessful Projects

16. The full impact of the reintroduction of any species will not be fully understood for quite some time. In some cases, the reintroduction of a species may have minimal impacts on human activities, and largely positive impacts on the environment. However, in some cases, issues may arise such as: negative impacts increasing over time, new populations arising, populations increasing to unsustainable levels. The CLA advocates a clear exit strategy being available as a part of any ELM scheme funding reintroductions. Some reintroduction projects will be thriving, but for those that, in the light of practical experience, would be better off abandoned or re-evaluated, reintroduction must be allowed to be reversed.

Liability and accountability under ELMs

17. The CLA proposes that the initiator of the reintroduction should be required to have public liability insurance in perpetuity to cover the costs of any damage caused by a reintroduction. Financial accountability for their presence is crucial. If reintroductions take place through ELM, the CLA would expect central Government to cover the costs associated with damage to property or include appropriate liability insurance as a requirement of the agreement.

Q4: How effective is current government policy and 2021 guidance in leading and managing species reintroductions? Should any changes be made to its policies and guidance?

Adaptive Support for Landowners

18. It is crucial that landowners can manage wildlife on their land, and the code fails to provide recognition of the costs to landowners who will need to continuously manage risks with the reintroduced species, even once the project has ended. The end of liability for a person or project who reintroduces the species doesn't mean an end to potential damage or unforeseen consequences. There needs to be guidance on what to do with species which move beyond the area in which they were reintroduced, particularly what it means for

landowners who have not consented to the original re-introduction but find themselves affected by it.

Potential Negative Impacts

19. For example, as beaver populations grow, we can envisage harm to trees (including trees recently planted on river margins to deliver public goods, as well as ancient trees). A commissioned report by Scottish Natural Heritage found that beavers can decrease the structure and quality of riparian (adjacent to rivers/streams) woodland⁵. The ponds created by beaver dams usually flood and kill trees in riparian habitats, which in turn could negatively impact woodland dependant species and threatened species which rely on riparian corridors. In the Scottish landscape where riparian woodland may be the only woodland within a landscape, an established riparian buffer zone which would stretch beyond the impact area of a beaver would be essential to mitigating negative effects on riparian habitats in the long-term⁶. This example demonstrates the need for nuanced, context-based considerations for meeting national nature recovery goals.
20. Land and property can be flooded as beavers are forced into more marginal habitat and start to undertake more 'engineering'. Beavers are driven to raise the water table and create wetlands, which is the exact opposite of what farmers and foresters may aim to do (and receive public payments for), thus creating a fundamental clash of interests and potential losses/remediation costs.

Q5: What improvements can be made in how local communities, landowners and other land users are engaged and consulted on reintroduction proposals? What practical steps can be taken to reduce conflict with these groups?

Communication

21. A high level of support for reintroductions from the population at large does not necessarily reflect the views of landowners who will be disproportionately affected by reintroductions. Reassurances that introduction projects will have minimal impacts are insufficient. Trust and cooperation can only exist where landowner concerns are heard and addressed rather than dismissed, including when concerns may be unpopular.
22. Good communication and engagement with landowners at all stages of the reintroduction proposal and process is crucial for success. Information on the cost-benefits of reintroductions must be based on rigorous scientific evidence, not emotive reactions to

⁵ Stringer, A.P., Blake, D. & Gaywood, M.J. (2015). A review of beaver (*Castor* spp.) impacts on biodiversity, and potential impacts following a reintroduction to Scotland. Scottish Natural Heritage Commissioned Report No. 815

⁶ Stringer, A.P., Blake, D. & Gaywood, M.J. (2015). A review of beaver (*Castor* spp.) impacts on biodiversity, and potential impacts following a reintroduction to Scotland. Scottish Natural Heritage Commissioned Report No. 815

biodiversity or habitat loss, or threat of economic damage. Clear evidence of both the positives and negatives of any reintroduction project is key to gaining the trust and participation of stakeholders. The general public's expectation should be adequately managed to avoid backlash or misunderstanding where a reintroduction project is not successful and requires translocation or lethal control.

Lessons from past reintroduction trials

23. In terms of other practical steps that can be taken to avoid or manage conflicts, the five-year River Otter Beaver Trial⁷ in Devon showed that landowner concerns can be assuaged with proactive management, clear communication, support when problems arise and compensation for damage caused. The Trial was successful in part because it engaged extensively with landowners in the catchment and put in place a series of processes to deal with any damage or problems caused by beavers.

Creation of Management Strategy Frameworks

24. The River Otter Beaver Trial was supported by a Steering Group comprising a range of stakeholders, including landowners. The River Otter Beaver Management Strategy Framework offers a possible template for reintroductions management in other parts of the country but only if it also included how to fund on-going management, what should be done when beavers leave the catchment area, and when the use of lethal control should be allowed.

A Robust Consultation Process

25. While there is a criterion which requires engagement with landowners, a more robust process is needed. There is limited transparency or accountability in the licence application process when it comes to consulting with landowners. A person or body applying for a reintroductions licence has sole responsibility for relaying feedback, giving room for misinterpretations of different perspectives.

26. The CLA believes that high risk or high impact reintroductions should be approached in a similar way to the planning process. The reintroduction process should require both a 12-week public consultation and mandatory consultation with all individual landowners within a release area over the same timeframe, because they will be directly impacted by the effects, whether positive or negative, of the reintroduction.

27. Based on members' experience and feedback, we suggest that a reintroduction project should be required to publicise their detailed proposal and conduct public meetings where views can be heard. A project point of contact should be available to answer questions

⁷ Brazier, R.E., Elliott, M., Andison, E., Auster, R.E., Bridgewater, S., Burgess, P., Chant, J., Graham, H., Knott, E., Puttock, A.K., Sansum, P., Vowles, A., (2020) River Otter Beaver Trial: Science and Evidence Report <https://www.exeter.ac.uk/research/creww/research/beavertrial/>

(see our answer to Question 6 on how this could work). Online surveys may be a good additional way of gathering views but cannot be the only channel of consultation.

28. Rather than the Government using a top-down approach to impose reintroduction projects in areas with privately-owned land, reintroduction projects should be locally led and have buy-in by all landowners affected. Successful reintroductions have taken place where landowners have been at the forefront of the projects.
29. The sections of the guidance on socio-economic outcomes and engagement are most important for our members. We believe that consultation with landowners is vital, and that the benefits of reintroduction must outweigh any negative consequences for it to go ahead. However, in both this code and guidance and the license application, there is no statutory requirement for landowner consultation, and there is no standardised process for obtaining landowner perspectives. Having such a process would build trust and address concerns from the start.
30. We have received numerous testimonies from CLA members, regarding various reintroduction projects, on how little consultation was conducted with them and how little feedback they were able provide. Members feel that the consultation aspect has been treated as a box-ticking exercise, where a decision had already been made, regardless of their concerns. Landowners have experienced situations where they were not adequately represented in the application process, resulting in conflict later. The code and guidance need a more robust section on consulting landowners.
31. The CLA conducted a member survey on the reintroduction of beavers to the Isle of Wight. While some are in favour, the majority have expressed concerns about both the process and the reasoning for this reintroduction. Members are concerned about such a high impact animal being introduced into a geographically small space and a unique area, where their potential habitat could be inadequate – the island only contains two rivers. Additionally, there are concerns about increased flooding and damage of farmland because of the flat, level nature of the island. Finally, according to Natural England, reintroductions, as the word suggests, is to bring back an extinct animal or help the abundance or an endangered one. However, there is no evidence of beavers' historic presence on island, putting into question the basis for the reintroduction. The CLA is concerned that these views have not been considered.

Q6: How could the development of long-term management plans and regulatory regimes for reintroduced species control be improved?

Permanent funding

32. The most important concern facing landowners when it comes to reintroductions is a clear pathway for how negative impact will be dealt with. The Government must commit to permanent funding and resourcing of reintroduction management. With any species reintroductions, including beavers, the assumption that after ten years people will have learnt to live with a reintroduced species may be unrealistic. Long-term landscape planning, such as the creation of buffer zones around where beavers have been reintroduced, would be a useful consideration.

Monitoring and tracking reintroductions

33. Monitoring of high risk or high impact reintroductions through tracking and DNA technology must be part of the funding for reintroductions. A monitoring requirement for at least the first ten years should form part of the license application for reintroductions. This monitoring will provide crucial data on species movements and impacts on the environment. It will also facilitate quicker and more effective responses to conflicts and negative impacts.

Reintroduction Project Managers

34. For each reintroduction project, we would like to see the creation of a point of contact, or reintroduction project manager, should there be any problems with a species which has been reintroduced. We would like to see a helpline and field officers as seen in the River Otter Beaver trial. While reintroductions of smaller species may cause limited concerns, larger mammals or birds, including predators, could have detrimental impacts on land, businesses, and species of conservation concern. In the longer-term, the CLA believes it is necessary to have reintroduction managers who are a point of contact for landowners, even once a reintroduced species is considered “wild” and the trial or project period is complete. This could be based on the experience of beaver reintroductions in Bavaria.

35. In Bavaria, beavers were originally reintroduced in 1966. Their reintegration into the landscape was followed by a 30 year period of high conflict with landowners due to crop feeding, felling of garden trees, damming of forest and agricultural land, burrowing under roads, etc. A beaver management program was established. Beaver managers facilitate consultation with landowners for conflict sites, and offer assistance with application for funding for protective measures (such as tree protection). The availability of a beaver manager means that both landowners’ concerns and preventative solutions are addressed swiftly. The beaver managers also monitor beaver population data. Due to the expansion of the beaver population, there is a need to cull up to 1000 beavers annually⁸.

⁸Campbell-Palmer R, Schwab G, Girling S, Lisle S (2015) Managing wild Eurasian beavers: a review of European management practices with consideration for Scottish application. Scottish Natural Heritage Commissioned Report NO 812

Permanent Local Reintroduction Management Boards

36. A possible way of engaging landowners is through the creation of Local Reintroduction Management Boards, through Natural England to engage the land management sector with the reintroduction process. The boards should be composed of at least 50 per cent land managers and farmers, alongside other stakeholders. They would provide a forum for consultation with landowners, provide technical support in the creation of trials, and would provide recommendations on future reintroduction policies to central Government.

Q7: What can the government do to help prevent unregulated species reintroductions?

N/A

Q8: What lessons could the UK government and Natural England learn from reintroduction in other jurisdictions, in UK and Europe?

37. Success stories from other UK jurisdictions and Europe show that even though there are many benefits to reintroductions, they usually still come with unintended consequences. In Question 6 we outline how “Beaver Managers” were introduced in Bavaria after over 30 years of high conflict between beavers and landowners. In this example, we illustrate that reintroductions will always have some negative consequences and as a result, management of the negative impacts is a permanent feature of these initiatives. In Scotland, beaver reintroductions have shown some negative impacts on riparian woodlands due to inadequate habitat size (see our response to Question 4 for further details).

38. There are concerns in the UK around the risks of reintroducing other species such as lynx or wolves, particularly around their impact on livestock and people. In Norway, where Eurasian Lynx populations have been recovering, 5,000-10,000 free-ranging sheep are killed every year by lynx⁹, while sheep killed by both lynx and wolves totalled around 20,000 in 2016¹⁰. Over 1,000 hill farmers in Norway are said to have given up sheep farming due to the high risk posed by lynx and wolves. While lynx have not been shown to single out livestock over other prey such as will deer, they will predate on livestock that fall within

⁹ Moa, P.F., Herfindal, I., Linnell, J.D.C., Overskaug, K., Kvam, T. & Andersen, R. (2006): Does the spatiotemporal distribution of livestock influence forage patch selection in Eurasian lynx Lynx lynx. - Wildl. Biol. 2: 63-70

¹⁰ FarmingUK Team (19 December 2017) 'Absolute catastrophe': Norwegians say reintroducing lynx would harm UK farming Farming UK. Available at: https://www.farminguk.com/news/-absolute-catastrophe-norwegians-say-reintroducing-lynx-would-harm-uk-farming_48187.html

their extensive habitat range. The Government in Norway must pay 2.1-2.9 million euros every year as compensation to landowners for lynx predation on sheep, and 1.1-3.4 million euros for predation of semi-domesticated reindeer¹¹. This raises the question of whether in the UK livestock practices can co-exist alongside such large wild carnivores. The negative impacts on farming businesses and the stress experienced by the landowners themselves could be significant.

39. In Yellowstone, USA, where wolves were reintroduced, it was found that these wolves roamed beyond their intended 2.2million acre habitat¹². The potential negative impacts and conflicts which would arise from large carnivores such as wolves moving beyond their intended could be significant. In a country such as England with high density urban areas, and where nearly 70% of land is used for agricultural purposes, wolves would come into conflict with livestock. The CLA is concerned that England is not prepared to deal with such significant consequences for rural businesses.
40. The lesson for England is that we should approach species reintroductions with caution. Where we do have reintroductions, we need an on-going, well-funded, adaptive management approach which allows us to address risks and conflicts with landowners as they arise.

¹¹ Shirخورshid, Mahboobeh (4 July 2017) Lynx – Norway 2017 Erasmus+ Archnetwork. Available at: <https://archnetwork.org/lynx-norway-2017/#:~:text=Direct%20compensation%20is%20also%20another,of%20direct%20compensation%20for%20loss>.

¹² Fritts, S. H., Watters, R. J., Bangs, E. E., Smith, D. W., & Phillips, M. K. (2020). How wolves returned to Yellowstone. In D. W. Smith, D. R. Stahler, & D. R. MacNulty (Eds.), *Yellowstone wolves: Science and discovery in the world's first national park* (pp. 13–25). Chicago, IL: University of Chicago Press.



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