



Institute of Fisheries Management

Defra Consultation

Approach to beaver reintroduction and management in England

IFM Response

Q1 – 4 General organisation information

Q5. Please briefly describe your interest in the consultation.

The Institute of Fisheries Management has a vested interest in the long-term sustainability of fish populations and especially those that are endangered and in need of protection.

This concern is compounded by the perilous state of fish stocks in England, in particular the following protected species:

Atlantic salmon – the Assessment of Salmon Stocks & Fisheries in England & Wales 2020 published in September 2021 by CEFAS, EA and NRW make this clear and has resulted in legal restrictions on salmon angling.

Eels – ICES advice published 4th November 2021 states that populations are in such an endangered position that 'ICES advises that when the precautionary approach is applied, there should be zero catches in all habitats in 2022. This applies to both recreational and commercial catches and includes catches of glass eels for restocking and aquaculture. All other anthropogenic mortalities should be minimized and eliminated where possible'

Other protected fish species in England that could be impacted by beaver activities are listed below

- Twaite & Allis shad
- Spined loach
- Brook, river & sea lamprey

As an Institute we would expect that any management decisions that may have an adverse impact on fish, or any other fauna or flora, would have a clear evidence base that is backed up by sound science. This does not seem to be the case with this consultation.

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 do not agree with the proposed approach to beaver reintroductions as it is currently set out as there are several issues with it, not least

- There is a need for a National Management Framework to adequately control and regulate beaver releases.
- There is no end point. What is the ultimate goal of these releases and how will we define when we have reached the maximum sustainable number of beavers in the wild in England?
- There is no cost / benefit analysis of population levels. It would seem logical to have this in place based on modelling of beaver numbers which show an increasing trend across England. As populations grow and begin to migrate between catchments that have supported beaver reintroductions impacts from their activities may negatively affect the wider ecology
- There is currently no management of illegally released beavers. This gives those who would wish to circumvent the process for legal releases carte blanche to carry on without fear of prosecution or removal
- Once wild, who has responsibility for the management of the beavers? Who pays? There needs to be financial support from government for management of wild populations
- Socio-economic impact on, in particular, rural communities.
- Long term funding?
- England-specific issues need addressing. This relates to the greater population density and built-up nature of the country. Available space, land and water management practices, paucity of tree cover etc differ significantly from most current cited release studies e.g. Scotland, Bavaria, Sweden.
- Some expectation management required. All current media outputs focus on the benefits of this charismatic mega fauna.

There is a paucity of data relating to the impacts of beaver activity on rheophilic fish species in England, and until such point that we can be certain that any impacts can be suitably mitigated beavers should not be allowed to spread into catchments where their activity will have an adverse effect on sensitive fish stocks. Barriers to migration are one of the main causes of failure under the Water Framework Directive and each year millions are spent on the removal of these barriers to aid fish passage and allow access to suitable spawning areas. In the wrong places beavers are going to add to this burden of barriers unless such controls can be put in place to allow for dams to be reduced or removed where impacts can be seen.

The other question that needs to be addressed is what takes precedent? Is it the protection of an endangered species such as salmon, sea trout and eels, biodiversity projects to reduce climate change impacts such as woodland creation or the spread of an introduced species that is no longer endangered across Europe?

A project timeframe of 5-10 years is not long enough for any impacts of beaver releases to be seen fully. In reality it is going to be 10+ years before the full extent of any beaver driven changes to a catchment are seen as this timeframe allows several generations of beavers to be born and spread from the point of release. There are numbers of terrestrial and aquatic long term studies that show 20+ years required to establish population dynamics cf. Shifting Baseline Syndrome effect.

Projects should not only provide evidence of low conflict within the project area they should model and plan for when the population increases and spreads to nearby areas. It should be possible and necessary to map likely areas beaver will expand into and the positive or negative impact in those areas.

The Local Beaver Officer should be in place for the length of the plan and for longer periods as required. This should include the time period 5-10 years beyond the expected/projected time for beaver to reach the desired maximum levels in the project area. As other organisations have noted it may be necessary to have more than one local officer to cover a catchment as the beavers spread and begin to cause multiple issues that may need to be managed.

Whilst any project proposal should 'provide evidence of substantial stakeholder engagement', we would suggest that this does not go far enough and what is actually needed is some form of contract between the project leads and all those within the catchment that could be impacted as the beavers spread naturally. Whilst we note the comments that under law once a native species is released it is the responsibility of landowners to manage these species, in the case of wild beaver releases this does not seem appropriate. There is a high chance that within only 2-3 years (one breeding cycle) that the beavers will naturally migrate from the point of release and move to land that was not part of the initial project area. Planning as mentioned above. Any licences should stipulate that the licensee is responsible for any impacts of beavers during this time both in the management of the animals and in covering the financial liabilities of any impacts outside of the defined project area.

The Environmental Land Management Scheme (ELMS) could be used as a vehicle to support the release of beavers and to compensate landowners for land lost to beaver activity which in turn makes more space for rivers which what is needed

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.

No response

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

As mentioned above we need a longer timeframe to fully assess the impacts of beavers on aquatic environments 10 years or more would be needed. We need to have a greater understanding of how long it will take catchments to reach a level where animals begin to freely migrate to other areas. There is a lesson to be learnt from the beavers in Scotland here and the impacts they have had once they have begun to move without restriction.

What is the status of wild beavers that have not been licenced and should they be controlled as would happen with the illegal release of many other species? Wild beaver populations that were illegally introduced and have not been licensed should not be given any protection status but should be subject to review on a project basis. If the populations do not meet the criteria set for a high-quality project with all stakeholder agreement they should be removed or become the subject of funded detailed studies with no guarantee of being allowed to stay. Natural England are very quick to ask for controls of species that they deem to be detrimental to a sensitive environment, see the Hoveton Great Broad project as an example of this, yet with illegal wild-living beavers there has been no controls at all. It is wrong to suggest they could not be removed because Beaver were trapped to extinction in the UK and more recently Coypu were also successfully eradicated via trapping.

These wild-living populations have provided the perfect opportunity to undertake further monitoring on populations, however, to date this has not happened. In fact, monitoring of beaver populations and in particular their potential impacts on fish has been very sorely lacking (see Cowx 2021). What little research there is seems to have focused on non-migratory Brown trout, a very widespread adaptable species that is equally happy in streams and stillwaters. Research would be better focused on migratory sub populations of Brown trout, salmon and rheophilic species whos habitat is recognised as under threat in large parts of the UK.

As an example of the potential impacts on sensitive fish species we would like to highlight the situation with Sea trout in Sussex,

If beaver dams are established on headwater streams in Sussex, they may damage the genetically distinct sea trout stocks there, which are of conservation significance. These precious large sea trout have limited spawning habitat. The beaver dams may stop access to the small streams where the sea trout spawn while siltation in impounded areas behind the beaver dams may also cause major damage to any redds that may be there. In recent years, there have also been expensive and major efforts to improve the Sussex Sea trout stocks by removing riverine barriers to migration, yet beaver dams would undo this good conservation work too.

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

We agree that the conditions for granting a licence for an enclosure release should be tightened and that all projects should be able to add to the knowledge base. To fully understand the benefits and impacts of beavers they need to be allowed to roam over a large area, these enclosures do not allow that behaviour to happen.

A licence should not be granted for a project that is simply an environmental vanity project for an estate that they then turn into a tourist attraction.

Too many animals have escaped from enclosures and then gone on to establish unlicensed secondary populations.

There is also a risk that these enclosures can add further barriers to fish migration by concentrating the animals in a concentrated area, often on small streams that are not suitable.

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

No response

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.

Although the consultation as it is written does not explicitly cover the intention to give beavers in England European Protected Species (EPS) we feel that this would be a step too far and not needed. The reason presented for EPS status is to implement legal obligations under the Bern Convention. At a European level beavers are no longer rare or threatened, indeed in some countries e.g. Sweden and Germany lethal control has been implemented to control numbers as they have created significant problems in some regions.

Post Brexit the UK is able to decide its own legislation and ensure that it is at a level suitable to meet our needs. We believe that EPS status would be a significant barrier to wider acceptance of beavers by landowners, fishery organisations and managers of critical infrastructure e.g road and rail. If beavers are given full protection, how do you have effective management?

There is little confidence in the licencing framework associated with EPS status and it brings with it significant 'baggage' and mistrust. The response from the Clinton Devon Estates makes a very valuable point about the spread of beavers in the Otter catchment where they expanded rapidly in the absence of protection and with no evidence of persecution. Yes, beavers do need a degree of protection and would support this, but we believe that EPS is the wrong legislation at this time.

Irrespective of decisions to protect beavers, their dams, when not associated with a natal lodge, should not be protected. The EA and NE should be given powers to act quickly to remove/reduce beaver dams that are deemed to be causing problems on all waters, even if the riparian owners do not support such actions.

There needs to be an understanding by government that there are going to be significant issues as beavers begin to migrate away from release sites into areas where the landowners have not signed up to local projects. This is where local Beaver Officers should have the power to act to mitigate these impacts without lengthy consultations with Defra bodies. These landowners who do have unwanted beavers appear on their land should not have the financial burden of management put upon them. We would like to see project proposers required to have indemnity insurance to cover damage to others property outside of the boundaries of the project.

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

Please see our earlier comment on the use of ELMS to support beaver releases

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

No response

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

No response