

Response ID ANON-W16X-P4K3-R

Submitted to Consultation on approach to beaver reintroduction and management in England
Submitted on 2021-11-16 17:16:21

Introduction

1 Would you like your response to be confidential?

No

If yes, please give your reason:

2 What is your name?

Name:
Dave Lamacraft

3 What is your email address?

Email:
davelamacraft@gmail.com

4 What is your organisation? If you are responding as an individual, please state 'individual'.

Organisation:
British Lichen Society

5 Please briefly describe your interest in this consultation.

Please provide your comments in the text box below:

The potential impacts of beaver reintroduction on the rich lichen populations for which England is internationally important. The assemblages of lichens that grow on trees in England are of great significance in a global context e.g. the woodlands along the Atlantic coasts of the south-west peninsula and in the Lake District - our temperate rainforest - and our ancient trees of old-growth woodland, wood-pasture and parklands which between them support significant proportions of European and global populations of certain species.

Many of these species are rare, with specialist niches, and currently under mounting threat from air pollution, climate change and changes in land management. This is reflected in the 'red-listing' of many species and inclusion in Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as 'species of principal importance for the purpose of conserving biodiversity' in England.

Evidence relating to the potential impact of beaver releases on these species and assemblages of species is lacking in England but 'evidence from Scotland showed a risk to internationally important lichen communities of Atlantic hazelwoods and rich assemblages on other host trees in beaver-occupied areas (Genney 2015; Acton and Griffith 2018)' (Howe et al 2020). Whilst we accept that there are likely to be 'winners' in the lichen world from beaver releases in England, we equally have concerns that there will be negative impacts, and fear that negative impacts will disproportionately impact rare and threatened species.

The British Lichen Society therefore has serious concerns that necessary measures do not seem to be in place to protect this important natural heritage for which the UK Government has a duty to protect e.g. under the NERC Act 2006 and we all have a duty to protect for future generations.

National approach to reintroductions

6 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

Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.:

Regarding the first bullet point above:

- any project proposal must include full consideration of potential negative impacts on lichen interest, especially for those listed on Section 41 of the NERC Act 2006
- Howe (2020) highlights the fact that little if anything is known of the potential impacts of beaver release on lichens. Therefore, any project proposal must include full provision for monitoring and assessment of impacts to build evidence that is currently lacking. The monitoring plan should extend beyond 5-10 years to decades, if not longer, to understand impacts on woodland and tree dynamics, and the dynamics of species dependent upon trees.

Regarding the third bullet point above:

- the term 'protected species' is often used to imply 'European Protected Species' i.e. those protected under The Conservation of Species and Habitats Regulations 2010. Consideration of and mitigation for species needs to be much broader. As a minimum this should be extended to all species listed on

Section 41 of the NERC Act and those contributing to features of interest of SSSIs. Arguably this should be extended to include species for which GB has internationally important populations i.e. a global responsibility for their conservation.

- potential measures to mitigate impacts on lichens exist (Howe et al 2020), but remain untested. However, creating beaver exclosures in areas of woodland or individual trees is likely to have a negative outcome for tree- and rock-dwelling lichens within the exclosures due to increased shading (Orange 2009; Sanderson 2012; Moore and Crawley 2014 referenced in Howe et al 2020).

7 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.

Please provide your comments in the text box below:

There needs to be a plan for the eventual increase in beaver populations following release. In the absence of natural predators, it seems highly likely beavers will simply increase in number and distribution as suggested by published evidence from elsewhere in Europe e.g. following reintroduction to Estonia in 1947-59 the beaver population stands at 121,000 and between 100,000 and 1500,000 in Latvia (reintroduced 1927-52 and 1975-1984). Even where natural predators e.g. wolf exist, numbers increase. It seems likely that the more beavers increase, the more conflicts will arise and at some point there are likely to be financial implications e.g. the cost of culling or compensatory payments as elsewhere in Europe (Campbell-Palmer et al 2015), and potentially difficult and contentious decisions to be made. It therefore seems prudent to include a plan at the outset for dealing with increasing populations, with 'no-go' areas e.g. with high value populations of veteran trees close to water courses and control measures implemented at an early stage before they become a more significant problem, this being guided by monitoring. Plans for dealing with increasing populations and, including 'no-go' areas, control methods and financial needs should be a fundamental part of any project proposal.

Existing wild-living beaver populations

8 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.

Agree

Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.:

We agree as we don't think it reasonable to undergo a programme of eradication. However, we recommend that appropriate long-term monitoring of the impacts of beavers on lichens and lichen habitat (including damage to existing habitat, creation of new habitat and colonisation of new habitat) is established. That would be the only way we could know the long term impacts and justify any desirable population control at some point in future if necessary.

Current and future beaver exclosures

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

Agree

Please state your reasons and supporting evidence. If you disagree, please provide any suggested alterations or alternatives and supporting evidence.:

We agree in particular with the 'tightening' of conditions licences on the basis that there seems to be a link on some level between licensed beaver exclosures and the presence of 'unofficial' beavers outside of exclosures e.g. the River Stour in Kent.

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

Please provide your comments in the text box below:

An enclosure licence should only be granted where full project proposals, as per the 'national approach' outlined at the beginning of this consultation document (with suggested amendments) are in place.

Management

11 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.

Yes

Please provide details of any additional aspects you think should be included in the management hierarchy:

Yes, we welcome the approach that effective and proportionate management of beavers is fundamental.

However, there are potential issues for England's internationally important lichen populations and protected/Section 41 species of some the measures e.g. tree-guards, anti-beaver paint and beaver exclosures around important trees and areas of woodland are all likely to have a negative impact on lichens growing on trees and rocks. The issue here is shading from uncontrolled vegetation growth and fundamental to this will probably be the scale of, and the management within, areas protected from beaver damage. It is probably the case the larger the area, the easier it will be to manage by e.g. grazing, and we would support the idea of 'no-go zones' i.e. large areas with important veteran trees over e.g. individual tree protection. Furthermore,

individual tree protection e.g. anti-beaver paint is likely to be directly damaging to lichens.

Management

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

Please provide your comments in the text box below:

There will need to be sufficient budget for survey and monitoring, especially the latter in order to build a sound evidence base. Survey and monitoring of lichens is a specialist activity and will require the skills of independent expert consultants.

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

Please provide your comments in the text box below:

Suitable guidance will be required for managing i.e. avoiding the potential negative impacts on lichen populations. However, this should be evidence based and evidence to date is lacking. The monitoring of the impacts of beaver enclosures and subsequent releases is fundamental to developing effective guidance.

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

Please provide your comments in the text box below:

All of the above with the addition of the face-to-face delivery of expert guidance. Again, expert consultants may be required to deliver this.

Additional questions

15 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.

No

If yes, please provide the general location where you might consider applying for such a release.: