



Q5. Please briefly describe your interest in the consultation.

Salmon & Trout Conservation (S&TC) was established as the Salmon & Trout Association (S&TA) in 1903 to address the damage done to our rivers and fish stocks by the polluting effects of the Industrial Revolution. S&TC is the UK's leading campaigning wild fish charity. We work to increase awareness of the growing need to protect our wild fish stocks and the rivers, lakes and oceans upon which they depend. Our aim is to achieve better protection for wild fish, water life and their habitats, employing policies supported by sound scientific evidence.

Our freshwater environment is under severe pressure, and wild migratory salmonids are on the frontline and in crisis. Atlantic salmon populations have declined 70% in the last 25 years. So, whilst we recognise the benefits that beavers can bring, we believe that the potential impacts of beavers on already threatened migratory salmonid populations are under-represented in discussions about beaver reintroduction.

The reintroduction of beavers has the potential to cause a number of conflicts with the UK's already severely stressed native fish populations, including:

- *Disruption to upstream and downstream migration of fish. All fish species move within river systems- migrating upstream and downstream to different habitats- from nursery to feeding grounds, some over greater distances, some more localised. This can result in the fish becoming more vulnerable to predation and/or poaching or have sub-lethal impacts such as the increased energetic cost to fish from delayed migration or reduced reproductive success due to spawning in sub-optimal locations.*

The freshwater environment is very different in the UK now compared to the last time beavers were widespread here. We have many man-made barriers and water quality pressures which already threaten wild fish migration. If not managed, beaver dams could be an additional barrier.

- *Changes in the temperature regime may also perturb salmonid populations. Increased temperatures found above and below the impoundments can be suboptimal for salmonids and are likely to reduce dissolved oxygen levels. The reduction of bankside vegetation and the associated shade can also result in increasing water temperatures, which could be damaging to salmon and trout populations, particularly considering climate change.*

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

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need more detailed evidence and studies to demonstrate that already threatened and protected salmonid populations will not to 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 our watercourses. They can have positive impacts on geomorphology, nutrients, sediment, biodiversity, and could help offer flood protection. Conversely, there are also risks. Beavers could adversely affect some environmental issues important to fisheries and the functioning of 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 help restore and conserve these native populations as an urgent priority. 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) and dedicated 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 needs period extending.

It is vital we learn from experiences on existing releases, such as the Tay and Otter.

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 beaver dams impeding the movement/migration of fish. In the example of fish passage, the authorised person would need to be a fisheries specialist. The Prof Cowx paper (does this need a link or reference?) highlights fish passage is time critical,*

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especially in times of low flow, so rapid legally permitted action would be essential to remove beaver-made barriers if they are found to inhibit local 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 and trout 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 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.

This proposal also 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, but they may impede the free passage of fish and will not allow catchment-scale benefits. They also do not add anything to current knowledge gaps- such as the impacts of wild fish movements.

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.

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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:

- 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.*
- 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.*

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.

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

Guidance and expert knowledge (for example from the Wild Trout Trust) in fish ecology, including the needs of wild fish populations during times of migration, 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)?

No response.



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