

Written evidence submitted by the British Association for Shooting and Conservation (SR0024)

Environment, Food and Rural Affairs Committee call for evidence on species reintroduction.

January 2023

INTRODUCTION

The British Association for Shooting and Conservation (BASC) is the largest shooting organisation in the UK with approximately 150,000 members.

Our mission is to promote and protect sporting shooting and advocate its conservation role throughout the UK.

Our role is to provide an effective and unified voice for sustainable shooting sports; to benefit the community by providing education, promoting scientific research, and advocating best practice in firearms licensing, habitat conservation, and wildlife and game management; and to promote the benefits of game as food.

Shooting contributes £2 billion a year to the UK economy and supports the equivalent of 74,000 full-time jobs.

Shooting is involved in the management of two-thirds of the UK's rural land area and plays a key role in nature recovery, benefitting some of our most vulnerable habitats and species.

Shooting contributes £250 million annually on conservation projects, involving 3.9 million workdays which is equivalent to 16,000 full time conservation jobs.

CALL FOR EVIDENCE ON SPECIES REINTRODUCTION

1. 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?

What role should introductions play?

The nature recovery objectives, specifically relevant to species reintroduction set out in the 25 Year Environment Plan, focus primarily on improving habitats, protecting sites and promoting land management approaches that connect and enhance the landscape for wildlife. BASC acknowledges that recovering threatened, iconic or economically important species is part of the process in creating a resilient and richer network of plants and wildlife.

BASC agrees that species reintroduction can be a tool within an extensive toolbox with which to complement or even drive species recovery. However, it should not be the first and only approach to species recovery, rather a last resort.

Species reintroduction (be it that of a locally, nationally, recently or long-term extinct species) can be a knee-jerk response to population decline or biodiversity loss.

BASC agrees that in many instances species reintroduction can be successful and bring species populations back over a threshold where they can become viable and resilient once more. As an organisation we have taken an interest in proposals and projects for reintroductions of hen harrier, osprey, white-tailed eagle, great bustard, grey partridge, water vole, pine marten and beaver.

Reintroductions can restore ecosystem processes and trophic cascades, however, they can be an artificial means of 'propping up' naturally declining species. As climatic conditions change and habitats alter with time, a species decline in one area can be the result of range shift to another, more optimal location, rather than an overall decline in species numbers.

Therefore, it is vital to understand and mitigate against the drivers of a species loss or decline before concluding that reintroduction (or reinforcement) is the correct response in the first instance.

Species reintroductions can be a press-worthy, appealing project for funders, more so than habitat restoration. It has immediate, visible impacts and this makes it an attractive solution to species decline or loss.

However, undertaking species reintroductions for this reason only perpetuates the attitude that this is the only solution.

BASC recommends that the government leads by example in advocating and providing funding for other measures to promote species and habitat recovery before translocations and reintroductions are attempted.

Reintroduced species (especially those that may have been absent for some time) may not fill the same ecological niche as before due to trophic shifts that may have occurred in their absence, as well as changes in habitat, predator and prey conditions or interactions. This may lead to unexpected impacts and interactions.

Should there be targets?

The spectrum of species considered for reintroduction within the UK is broad and therefore does not lend itself to strict criteria and targets. Water voles for example have a substantially different life history to white-tailed eagles.

As previously stated, species reintroduction should usually be a last resort within a decision-making framework of species and habitat conservation.

BASC suggests that rather than setting objectives and targets for reintroduction itself, a clearer decision-making framework should be promoted that ensures all other avenues of species conservation and population restoration have been explored before reintroduction is deemed the best option.

Releasing many extra individuals can provide an instantaneous and effective population boost, but it may only mask long-term deterioration in other factors influencing population viability such as habitat degradation, a reduced prey assemblage, inter-species competition, predation or climate change.

BASC suggests that if a target must exist, it is to reach a position where species reintroductions should not be required at all. An increase or aspiration for more species reintroductions can mask underlying issues of habitat degradation, fragmentation and unsustainable land-use.

BASC supports species reintroductions where all other avenues of species recovery have been explored or attempted unsuccessfully and where evidence demonstrates that reintroduction would not only be successful, but is necessary for landscape-scale species recovery.

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

For afforestation and re-planting strategies, it is vital to scrutinise a project to plant 'the right tree, in the right place, for the right reason'.

BASC advocates a similar and rigorous approach is taken with regards to species reintroductions. This requires a robust framework which takes into consideration the effect these species reintroductions may have on the immediate and surrounding landscape as well as the species and land-uses it may impact. This framework needs to look at both the short-term and long-term impacts of a 'successful' reintroduction to enable a robust reintroduction plan.

To yield maximum benefits from species reintroductions, the government needs to ensure that species reintroductions include complementary actions.

Single-species conservation can be somewhat detrimental to broader ecological needs, focussing action and funding on an individual charismatic species.

BASC recommends using species reintroductions as part of a wider suite of conservation solutions. This holistic approach is key to species reintroduction messaging and action, but currently requires substantially more funding.

Such areas or actions include habitat restoration, habitat creation, species management, reducing disturbance, as well as monitoring and review based on robust evidence. These actions are often deemed secondary but should be regarded as equal, and collectively are a more powerful force for change than species reintroduction alone.

BASC continues to promote and provide training and support for invasive species control in combination with species recovery programmes. This includes mink control, in collaboration with Natural Resources Wales and water vole reintroductions, as well as grey squirrel control in red squirrel conservation areas around Clocaeog Forest, Wales (2015-2018).

BASC suggests that greater funding should be provided to improve habitat and encourage monitoring and reporting, either to those carrying out reintroductions or those impacted by reintroduction. This funding will facilitate better identification and realisation of benefits where relevant, as well as identification of costs and negative impacts which should inform future reintroductions.

BASC is leading by example and has committed funding towards Natural England's hen harrier recovery work. This funding will support proactive engagement with land managers around the reintroduction site to facilitate monitoring and long-term conservation of this species alongside informed mitigation work

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

[Please note: nELMS is currently in review, however our feedback relates to the proposals made to date.]

BASC does not think that ELMS should directly support species reintroduction (in relation to project staff funding, sourcing and releasing species). This may erode buy-in to the ELMS scheme by landowners who have concerns about species reintroductions.

However, BASC believes that complementary action to facilitate species recovery or establishment could be part of the ELMS options, such as predator control, invasive species management and habitat creation. Already, recreational shooters undertake habitat creation and management to support a wide range of species alongside predator and non-native species control, without burdening the public purse. With greater incentive, the impact of such work could have even greater positive impacts at a landscape-scale.

Species reintroductions, especially those of wide-ranging species, require joined-up working between landowners and managers and BASC is supportive of this type of landowner-driven conservation collaboration.

The Landscape and Local Nature Recovery Scheme frameworks lend themselves to these projects and could facilitate collaborations between stakeholders across large areas, crossing county boundaries which species are not bound by.

4. 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?

BASC would like to highlight five aspects within the document 'Reintroductions and other conservation translocations: code and guidance for England - Version 1.1' (DEFRA, 2021) where further clarification, greater change in policy and legislation or further funding is required.

i. Licencing and control of reintroduced species

The guidance discusses population growth of a recovering species, comprising the establishment, growth and regulation phases (p19). It would be beneficial to highlight within the regulation section that although some species will self-regulate, in a population that faces limited pressures and predation, it may be necessary to consider human-mediated regulation and management.

At various points throughout the guidance (p22, p31, p39), there is reference to licenced control of a reintroduced species where it may be necessary. BASC agrees that this is key to building trust and transparency between stakeholders, project staff and regulatory bodies.

BASC is aware that control and management of a reintroduced species may not necessarily constitute lethal control. However, it is vital that an effective and legal method is available to remove problem individuals in a time sensitive manner where necessary.

This regulated management needs to be clear and accessible and therefore must be discussed with regulators, ensuring the correct systems are in place *prior* to reintroductions. This allows for action to be taken before significant human-wildlife conflict occurs, rather than when the species is 'out-of-control'.

For some species being proposed for reintroduction (or already reintroduced), no clear management plan for the species was or is in place prior to release and this includes pine marten, beaver and red kite. The reliance on an individual licence system is a long-winded process which results in ad-hoc, and often ineffective management.

BASC believes that species reintroduction plans should include a population management plan to allow for more joined-up and well-monitored work. This concern and call for clearer guidance on control is well-captured within Bavin & Macpherson 2022 in relation to proposed lynx reintroductions in Scotland as well as beaver reintroductions (legal and illegal in Scotland – Coz & Young, 2020).

ii. Indirect impacts of reintroduced species

The guidance acknowledges that the Agriculture Act 1947 (section 98 to 100) states that landowners can take action on a list of species to prevent damage to crops, livestock etc.

BASC believes that the impact of the reintroduced species on a landowners ability to continue to control pest species (and some Schedule 9 species) is not made explicit enough in the guidance.

For example, lethal control methods such as spring traps and poison bait are used effectively in legally controlling grey squirrels and rats respectively. The presence of a reintroduced species may require these control methods to stop in case of its accidental killing or secondary poisoning.

Cessation of this species management may mean; i) a breach of farm/rural payment terms, ii) increased damage to agricultural products and resulting economic loss and iii) detrimental impacts on ecosystems.

BASC suggests that further advice for reintroduction project managers should be provided on how to explore and mitigate against these indirect challenges whilst enabling legal wildlife management to continue.

BASC believes that the indirect effects of reintroduced species are also overlooked in the guidance with regards to socio-economic costs to livestock and game (p57). Impacts listed are direct, such as disease transmission and predation, however indirect effects can have equally large ecological and economic costs.

Disturbance and non-lethal predator interactions such as fear-mediated responses can reduce fitness of livestock and game and result in altered ecology and behaviour on a site.

BASC suggests these data-deficient concepts should be highlighted within guidance and warrant investigation, and at the very least require monitoring prior to and during species reintroductions.

iii. Mitigation

With regards to resourcing (p65), BASC suggests that funding to mitigate against any negative impacts or conflict created by the project should also be accounted for within a *minimum level* of funding required. This relates to issues encountered that can be resolved before reaching a threshold where an exit strategy would be initiated.

In some instances, there is a mitigation strategy but lack of funding to support it (with regards to staff time and/or materials), or lack of legislation to facilitate mitigation or control at the necessary rate.

BASC has had a positive experience with the Vincent Wildlife pine marten reintroduction in mid-Wales. This organisation has not only provided information to shoots and keepers online, but the project retained substantial funds to provide mitigation against poultry or gamebird predation within the release region.

iv. Engagement

BASC agrees that engagement and consultation with stakeholders is a vital aspect of reintroductions (p58).

However, not proceeding with a reintroduction should not be deemed as a failure. Reintroduction feasibility work is a decision-making process. It is *not* a pathway towards a definite reintroduction, rather an exploration of possibility. The language used biases all feasibility work towards reintroduction and against other stakeholder priorities and land uses.

BASC therefore advises that the wording used should better capture this distinction.

v. Monitoring and evaluation

BASC is concerned that across the conservation sector, funding for monitoring and evaluation of conservation interventions is lacking (Tinsley-Marshall et al, 2022). If this is being advocated within government guidance, there needs to be a greater effort by regulators and funders to financially support such work.

Guidance states monitoring can be done throughout the project and 'usually beyond'.

BASC believes that post-project monitoring is essential, not optional. Once a reintroduced species has become established, different challenges can be experienced and unexpected conflicts can arise. Unfortunately, this aspect of a project is less attractive to funders and as a result it is assumed the project has been a success and there are no issues following the official project end-date.

However, for many landowners and managers, the reintroduced species can become a problem, which is fully protected, with no licencing system in place. This is well demonstrated in the illegal beaver reintroductions on the river Tay in Scotland.

BASC suggests that projects should reserve funding, or establish systems of monitoring, for better assessing short, medium and long-term success. Therefore, extending monitoring beyond the official project dates and enabling the recording of developing challenges or unforeseen benefits.

5. 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?

BASC has representation on the National Species Reintroduction Forum in Scotland and is therefore engaged with species reintroductions and conservation translocation proposals on a national level.

BASC represents the views and interests of its membership and therefore, by proxy, feels that engagement at this level within Scotland is positive and productive.

Unfortunately, there is no such forum or platform for discussion in England, Wales or Northern Ireland. As a membership organisation, BASC would like to see collaborative working at this level in all nations. This collaboration and discussion between organisations can positively influence relationships between memberships, as well as identify membership priorities and potential challenges before they are realised on-the-ground.

BASC's view is that greater effort on consultation with stakeholders, as well as improved transparency of the mitigation and licencing surrounding species reintroductions, would improve engagement and reduce conflict. These two aspects are discussed below:

i. Consultation

BASC agrees that undertaking social and ecological feasibility studies are key aspects of all species reintroduction programmes. However, often the social feasibility work is deemed secondary to the ecological research, when in fact they should be regarded with equal importance.

BASC have seen this work effectively during a pine marten reintroduction in the Forest of Dean. BASC members close to the release area were surveyed to assess attitudes toward the species, highlighting local concerns and raising awareness of the project. This feedback was considered in the reintroduction project development and allowed for focussed engagement with gamekeepers by the reintroduction team from Gloucestershire Wildlife Trust.

BASC has experience as stakeholders within such feasibility studies and consultations. In many instances, stakeholder engagement and consultation is undertaken *after* funding for the project has been secured with an attitude of not *if* the species is reintroduced but *when*.

This tick-box approach can cause polarisation of views and attitudes and as a result, conflict that cannot be resolved.

This is well demonstrated in the rejection of proposals to reintroduce the Eurasian lynx to Kielder Forest, in part due to insufficient engagement with key stakeholders and communities (Bavin & Macpherson 2022). See also the case of the white-tailed sea-eagle reintroduction in Ireland (O'Rourke 2013).

BASC recommends that social/stakeholder feasibility work is a dynamic and iterative process, rather than a one-stop consultation searching for a binary 'for' or 'against' answer (see thorough alternatives by Bavin et al., 2020 and Bavin & Macpherson 2022).

By engaging with communities and landowners, identifying potential challenges and concerns, and then working together to find solutions or develop mitigation tools, projects can not only reduce the chance of conflict but can improve and strengthen stakeholder relationships.

ii. Licencing and mitigation

BASC acknowledges that funding for mitigation work, adaptive management and response to project conflicts is often lacking in funding. It is not deemed as 'positive' or an attractive

aspect of work for donors to fund. Yet it is a vital part of long-term project success and stakeholder buy-in.

This funding and/or the processes surrounding mitigation work should be transparent, instilling confidence in the stakeholders that they are not powerless and there is a system in place for control or management where required. This aspect is discussed further in our answer to question 6.

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

i) Species control

Often, reintroduced species are granted immediate, full protection. This is due to initially small population sizes and a bid to reduce any negative impacts on a recovering population.

However, the bureaucracy surrounding re-listing species or creating a specific licencing process for their management is long-winded and is not flexible enough to allow for direct intervention when needed.

As a result, this prevents control and management of expanding reintroduced species populations and drives increased conflict between stakeholders.

This has been well demonstrated through NatureScot's experience with beavers, where a framework for mitigating negative outcomes and allowing for control when necessary, should have been in place long before the species cause any conflict.

A system of adaptive management which is informed by species monitoring and regular evaluation can allow for the development of conflict resolution strategies. An example can be seen in the scientific hen harrier brood-management trial which takes young hen harriers into a captive environment during a life stage where they cause issues for young grouse. These birds are then re-released after this crucial stage, reducing conflict between species and stakeholders.

BASC advocates that, within the government framework of species reintroductions, there should be clear pathways to developing management strategies for species, prior to their reintroduction. It is also vital that messaging to the public regarding species management is well managed. A cultural shift is required by regulators, media and general public in the way that species control or regulation is handled if we are to continue with species reintroduction and management.

Transparency and proof of process, as opposed to ongoing monitoring with no thresholds in place, can empower stakeholders. Long-term monitoring without a clear link to conservation actions, be that for a declining or an increasing species, is a failure to truly manage a species (Lindenmayer et al., 2013).

Rather than encouraging stakeholders to manage species through illegal means, more accessible licencing processes are likely to encourage better reporting, feedback and mitigation. See references to successful projects in our answer to question 8.

BASC suggests that this process should comprise a transparent system for i) recording any conflict and negative impacts experienced, ii) describing the evidence required to support these claims, iii) a threshold where conflict initiates a response, iv) the various actions which

can be taken based on the burden of proof and v) a feedback loop which reviews if this action has been an effective solution to the issue.

This process requires buy-in from regulatory bodies and provision of staff time and money to facilitate these discussions, consultations and changes.

BASC believes that the evidentiary standards required in licencing systems that currently exist are often unattainable, eroding the value and effectiveness of such systems, as well as stakeholder confidence in them. This system and its processes need to be fair and unbiased across all species.

The McMorn case demonstrated that the current licencing system within Natural England requires improvement to become fairer and more effective. Although such a case related to buzzards rather than a reintroduced species, it highlights that differing standards of evidence are expected for more controversial species.

BASC has experienced a lack of proactivity from the regulator to improve the speed and effectiveness of the licencing process in relation to recently reintroduced species such as pine marten and beaver. This does not instil confidence between land managers and the regulator and is likely to erode any support for future, more ambitious species reintroductions.

ii) *Long-term management plans*

As stated in previous answers, long-term management requires long-term funding. This is lacking across the conservation sector, particularly with regard to funding staff time. Without promoting increased funding for long-term, low-level management and monitoring, it will remain a challenge for conservation organisations. This monitoring and management then becomes a burden placed on affected landowners and land managers.

7. What can the government do to help prevent unregulated species reintroductions?

BASC has highlighted its main concerns with the current systems and processes in place regarding species reintroductions in the UK within this response. Greater clarity of process may help to increase broader public understanding of the challenges, impacts and benefits of species reintroduction.

BASC believes that the establishment of the England Reintroduction Task Force will help to streamline this process and provide a clearer, unbiased framework to facilitate species reintroductions in England.

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

Regarding the areas of concern surrounding population management and licencing to control reintroduced species, we highlight some examples of proactive population management in Europe:

The 'Management Plan for the Wolf Population in Finland' provides a good example of how people and species conservation are considered collectively in a clear, species-specific management framework. This plan addresses conflict of different kinds, with clear categorisation of risk measures that can be implemented, and which organisations are responsible for responding, recording or undertaking any action.

This management plan was developed through stakeholder work across the country and is an example of a transparent, collaboratively developed document, suitable for both policy and practical application.

Latvia has also demonstrated effective conservation of Eurasian lynx through a national action plan which enables limited but highly regulated hunting of the species. The action plan allows for immediate reduction in any hunting where necessary and has previously been highlighted as a 'best practice' example by the European Commission. Such controlled hunting has not negatively impacted the recovering lynx population, which demonstrates positive trends. Public views on the species recovery and its control have also been positive due to hunter and public involvement in their involvement in monitoring.

Unfortunately, Latvia now faces pressure from the European Commission to place lynx under strict protection and prevent all hunting (INFR(2021)2260). When such a move was made in Croatia in 1998, illegal killing of lynx increased dramatically (Sindičić et al 2016). The Latvian action plan demonstrated that low level, regulated, flexible control of a recovering species can enable positive public and stakeholder perception of a species, and its control, alongside exponential recovery of its population. Removal of such legislation not only damages conservation objectives but damages the trust and empowerment built from allowing low-level species management.

January 2023

References

- Bavin, D., MacPherson, J., Denman, H., Crowley, S.L. and McDonald, R.A., 2020. Using Q-methodology to understand stakeholder perspectives on a carnivore translocation. *People and Nature*, **2**(4), pp.1117-1130.
- Bavin, D. & Macpherson, J. 2022. The Lynx to Scotland Project: assessing the social feasibility of potential Eurasian lynx reintroduction to Scotland. Vincent Wildlife Trust.
- Bergstrom, B., Arias, L., Davidson, A., Ferguson, A., Randa, L. & Sheffield, S. 2014. License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function. *Conservation Letters* **7**(2), pp131-142.
- Coz, D. & Young, J., 2020. Conflicts over wildlife conservation: Learning from the reintroduction of beavers in Scotland. *People and Nature* **2**, pp406-419.
- Lindenmayer, D., Piggot, M., & Wintle, B. 2013. Counting the books while the library burns: why conservation monitoring programs need a plan for action. *Frontiers in Ecology and the Environment* **11**(10), pp.549-555.
- Management Plan for the Wolf Population of Finland. Publications of the Ministry of Agriculture and Forestry of Finland 2019:26. Helsinki.
Accessed:https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/161867/MMM_2019_26.pdf
- Sindičić, M., Gomerčić, T., Kusak, J., Slijepčević, V., Huber, Đ., Frković, A. 2016. Mortality in the Eurasian lynx population in Croatia over the course of 40 years. *Mammal Biology* **81**, pp290–294.
- Tinsley-Marshall, P. et al 2022. Funding and delivering the routine testing of management interventions to improve conservation effectiveness. *Journal for Nature Conservation* **67**, pp126184.