

## Written evidence submitted by the National Sheep Association (SR0028)

**Date:** 13<sup>th</sup> January 2023

The National Sheep Association is a charitable company that represents the views of sheep farmers through a membership structure across the United Kingdom of Great Britain and Northern Ireland.

### Introduction

NSA would advocate for the diverse tapestry of habitats and biodiversity across farmland in Britain. Protecting these habitats that exist and the species that are at risk right now should be the priority for government. NSA firmly believes that reintroductions must be addressed on a case-by-case basis especially when considering predators and those proven to have irreparable consequences to the agricultural industry but also the natural ecological equilibrium, for example Lynx, Beaver and White-Tailed Sea Eagle. NSA would also advocate the importance of a case-by-case for all reintroductions including fungi and plants.

NSA has always supported the unique diversity of Britain's plants and wildlife and would be an advocate for ensuring government make a clear statement for their intentions and outcomes to ensure there are no conflicting policies that impact producing sustainable food.

NSA member across Britain and notably Scotland have been at the sharp end of species reintroductions, from poor consultation processes, illegal releases, no management strategies and no mitigation, exit or recognition of the impacts to farming businesses and livelihoods.

NSA would direct interested parties to our report on *The wider consequences of the introduction of Eurasian lynx (*Lynx lynx*) to the UK* [which can be found here](#), although focusing on one specific species NSA would advocate that the impacts of species reintroductions are far reaching.

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?](#)

NSA is keen to ensure that the species we have at risk throughout the UK such as hedgehogs, water vole and harvest mouse must be prioritised to ensure that any reintroductions of potential apex predators do not put these species at further risk.

There must be practical and science-based evidence and reasoning behind any potential reintroductions of risk species and NSA would advocate for a case-by-case approach, to ensure there are practical, and workable management along with a robust and clear strategy that ensure unintended consequences are avoided.

Targets that are set must be very specific and measurable to ensure that any reintroductions are held to account and do not negatively impact although native species. There must also be careful forethought for our own endangered native species that could potentially be put at risk by the reintroduction of a species – for example the Eurasian Lynx – which is flourishing in other parts of the world. The Eurasian lynx is thought to have been extinct from the British

Isles for 1,300 years due to a decrease in forest area and persecution by humans. The species is in the category of 'Least Concern' on the International Union for Conservation of Nature (IUCN) Red List due to its large range (Western Europe, the boreal forests of Russia, central Asia and the Tibetan plateau).

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

Any reintroduction of a high risk or predator species must only be considered through extensive consultation with local stakeholder – this must include farmers, land managers, local inhabitants, businesses and nature managers. Consultation process for similar reintroduction proposals has been incredibly poor with local areas many of those directly impacted have felt as though they have been ignored and their concerns minimised.

There must be a scientific evidence base for any proposed introduction to ensure the current biodiversity equilibrium is not disturbed and also to ensure that the reintroduction is self-sustaining.

There must be measurable outcomes that are reported upon meaningfully and regularly to ensure that the true impact of a species on the local biodiversity is monitored and measurable.

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

NSA would advocate firmly that the initial prospectus for the Environmental Land Management Schemes must remain firm and that it should be a scheme developed to enhance and encourage innovation in the agricultural industry. The schemes must have sustainable food production at their heart. NSA would also highlight the lack of farmer confidence in the proposed scheme especially due to recent government announcements that LR and LNR would regress into an enhanced version of Countryside Stewardship.

NSA would support those reintroductions that are scientifically proven to enhance agriculture, the countryside and food production without damaging our delicate ecosystems.

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?

NSA is increasingly concerned around the contradictions in government policy, as outlined in later questions. It is short-sighted of government to incentivise habitat creation and improved animal welfare whilst in the next breath encouraging species reintroductions that will severely damage the biodiversity of habitats we already have and impact animal welfare. Furthermore, NSA would be incredibly concerned that incentivising habitat creation on farm to then introduce an apex predator like the lynx will further the distrust between agriculture and government but also ensure that future schemes focused on habitat creation are a failure.

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?

There must be accountability for reintroductions, ongoing management and an exit strategy. NSA would advocate the importance of ensuring there is face-to-face consultation with the local businesses and communities impacted by potential risk species being introduced, there must be workable and practical agreement amongst stakeholders. Any stakeholder engagement must not be treated as a 'tick box exercise' and government must ensure that stakeholders making an application for reintroduction must be held to account.

There must also be recognition of the potential consequences for the local area, for example responsibility of increased footfall, maintenance of paths and gateways, rubbish collection, vehicle infrastructure, parking, fences and destruction of landscape features due to increased footfall.

NSA must highlight the potential increased risk to livestock that comes with increased footfall, especially the risk associated with sheep worrying, a problem which we are seeing increasing in fatalities year on year.

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

It is important that government outline what they deem a successful reintroduction, NSA would advocate that the whole biodiversity of the area must be assessed along with impacts to other species. There must be clear guidance and stipulation amongst reintroduction especially larger species that consider when a species becomes a pest, especially following the repercussions of illegal Beaver reintroduction across Argyll.

NSA would be incredibly concerned following reintroduction of Beaver and White Tailed Sea Eagles that there is an expectation for farming business to absorb the costs of damages incurred by these species reintroductions. There must be a significant budget available to ensure that damage to livestock and infrastructure is met with fair compensation and mitigation action, this should include regular review of the reintroduction strategy and a clear exit strategy.

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

The government must have clear intentions from what they hope to achieve. Any reintroduction of a species, especially any apex predator must be strictly regulated. NSA has been especially concerned where apex predator have 'escaped' and the consequences have been little to none for those responsible.

NSA is extremely concerned that future government policy is becoming conflicted, many policies are ensuring farmers are improving animal welfare, planting hedgerows and developing habitat and moving towards a sustainable future, there is a risk that firstly those habitats won't be created or invested in if there is a risk that further down the line they could be the target of a lynx/beaver or WTSE reintroduction. Secondly NSA along with other industry bodies is working tirelessly to ensure that sheep worrying by dogs is getting the recognition and regulation it needs, NSA has been encouraged by the increased police powers to tackle this in the Kept Animals Bill, however the introduction of a species like Lynx or WTSE puts the animal welfare of farmed livestock at serious risk.

Defra must identify their priorities and ensure that sustainable land management and food production along with current biodiversity is not put under risk.

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

Comparisons cannot be made between the UK and Europe, there are vast land scale and landscape difference that are incomparable.

It must be made abundantly clear on what metrics will be used to quantify success and outcomes, there must also be regular (annual) reviews of the population which are publicly available – also have a pre-determined value of when an intervention may be needed in terms of the population getting out of control and significant damage is occurring. That value must be flexible dependent on the real-world impact of an introduction. This also applies to adult and juvenile populations – rogue predators within a population should also be stipulated and what can be done to control them.

There must be clear identifies early on as to what evidence is needed to prove predation. Not only does this educate the land owners and managers from the beginning but also makes it easier to document occurrences throughout and prove trends.

NSA believe it is absolutely imperative that there is a clear plan in place for responsibility of the reintroduced species, especially when it comes to maintaining the natural environment, possible increased footfall and subsequent consequences – traffic, litter, fencing, pathways, gates, damage to crops, fields, and livestock worrying incidents.

There absolutely has to be a clear exit strategy that can be put in place at the request of local businesses and farmers impacted if needs be. This must not be a decision made by those making the reintroduction. Regulation and a clear government position is needed to ensure that biodiversity and sustainable food production is in no way put at risk.

Government must ensure there is a sufficient budget and package available to those that suffer the greatest detrimental impact of certain species reintroduction especially WTSE, Beavers and Lynx. There must be a clear intervention plan, that must animal welfare, and farm business first and foremost, ensuring that any detrimental impacts are minimal and address within a short time period.

NSA would advocate that there must be significant assurances that organisations such as RSPB and NatureScot do not minimise or deflect the impact of apex predators on sheep farmers and crofters. The monies accrued from ‘tourism’ off the back of reintroductions rarely make it back down to the farmer level and is promoted as being beneficial to the ‘economy’ – this is difficult to advocate.

NSA is extremely concerned regarding the Scotland approach to managing impacts of WTSE predation. The convoluted and complex process to apply for a licence of control. Before which alternatives are suggested i.e. diversionary feedings, increased footfall etc. Part of being a monitor farm is trying out the different things – some only work for a certain time but are not an effective solution for the short or long term. There must be a level of protection and range of options for landowners/managers to be able to cope.

NSA Scotland member have highlighted that post-mortems are carried out as soon as possible to prove that the animal i.e. sheep/lamb was in good health at the time of the attack - this

counteracts the line from RSPB etc that it is only ill thriven lambs that are taken by Sea Eagle's/any reintroduced species. Indicating that there must be some kind of significant government intervention or approach to these issues too ensure that the real consequences and impacts being felt on the ground are not ignored. More must be done to manage and mitigate impacts for example Scotland has seen that compensation is only a tiny part of what is involved. Hefted ewes are incredibly hard to replace and are costly. It isn't just one generation that has been wiped out it is many generations of breeding and tradition. The margins simply aren't there when it comes to restocking or sustaining a viable flock due to the sheer number of birds that are being bred and also the type of land (marginal) and acreage involved. In the danger of facilitating a species to be entirely reliant on the predation of domestic animals. Compensation, even when it can be achieved, puts the farmers in the position of breeding lambs to feed another species which due to the huge, assisted increase in numbers cannot sustain itself – this cannot be a true balance of nature.