

**Written evidence submitted by The Lifescape Project (SR0029)  
December 2022**

The Lifescape Project is an ecosystem restoration and rewilding charity which wants to see a world where wild nature can coexist and thrive alongside humanity. Our vision includes, where appropriate and feasible, the reintroduction of species which are missing from ecosystems due to anthropogenic reasons.

Great Britain was originally home to an assemblage of mammal species similar to those currently found in recovering ecosystems in parts of mainland Europe. These ecosystems were once complex across trophic levels, with herbivores like deer, elk and beavers; omnivores such as badger and fox; middle (meso) predators like pine martens; and top (apex) predators such as brown bear, wolf and lynx. Over the last two thousand years we pushed many species into extinction or left populations clinging on in remote areas, resulting in precarious, fragmented ecosystems with a fraction of the biodiversity and function than should be present.

The Lifescape Project takes a multi-disciplinary approach to environmental improvement and currently hosts a range of projects. Of particular relevance to this inquiry are four projects: the reintroductions of Lynx within Great Britain and White-tailed Eagles in Cumbria, an initiative called 'Kept wild' which considers the role of native large herbivores in rewilding, with a particular focus on the applicable legal and regulatory frameworks and our Natural Capital Laboratory. We were also closely involved in Trees for Life's judicial review of NatureScot's beaver culling policy.

**Lynx:** Reduced habitat and persecution led to the decline and loss of the Lynx both here in Great Britain and across Europe. Legal changes and changes in the perception of predators have led to an increase of Lynx populations across Europe, but not yet in Great Britain. If ecologically and socially viable, a reintroduction of Lynx could restore this lost species to Great Britain. Lifescape have worked with European partners to complete the ecological and viability assessment for this species and are currently working with partners to plan practicalities and social consultation.

**White-Tailed Eagles:** White-Tailed Eagles are the largest native bird of prey in the United Kingdom, they were once widespread in Great Britain but declined in numbers due to agricultural changes and then became extinct in 1916 through human persecution. White-tailed Eagles were once found in Cumbria in abundance, with the last recorded breeding attempt near Haweswater in 1787. Legal changes and changes in the perception of raptors has led to an increase across the palearctic. The species is amber listed in the United Kingdom with all adult birds restricted to the Scottish mainland and offshore islands. Cumbria is a location of strategic importance for White-tailed Eagles, sitting between Scottish, Irish and Southern England populations which have already been reintroduced, and acting as a potential connection between each of them. Lifescape have worked with partners to complete a pre-feasibility assessment of Cumbria and are currently completing the ecological, practical and social feasibility assessments.

**Kept Wild:** In Britain, the only wild large native herbivores remaining are red deer and roe deer in various parts of the UK. Most other large herbivores are either extinct or have been removed entirely including elk, wild cattle (aurochs), wild horses (Eurasian wild horse), European bison and wild boar (an omnivore, although a few populations have re-established

in Britain). As a result, our ecosystems are missing a vital part of their jigsaw which needs to be reinstated as part of the creation of a fully-functioning ecosystem. Lifescape is a founding member of the Large Herbivore Working Group which has been set up to create the conditions for large wild herbivores to return to Britain. Our work within the group focuses on exploring the legal implications of rewilding with large herbivores and we have already initiated conversations with DEFRA about the key legal hurdles and how they might be overcome.

The NCL: The Natural Capital Laboratory centres around adopting the IUCN CEM Rewilding Principles at Birchfield, a 100 acre estate in Scotland. It combines the restoration of natural habitat (including re-introduction of lost species) with creating innovative approaches for quantifying and valuing natural capital uplift, and other positive changes associated with rewilding.

Beavers: Eurasian beavers are a protected keystone species which have returned to Scotland and England over recent years. We worked with Trees for Life to develop the legal theory behind its challenge to NatureScot's unlawful beaver culling policy. As a result of the challenge and ongoing advocacy, there has been a significant shift in NatureScot's management of Scotland's beaver populations which can now be translocated outside of current catchments where human-wildlife conflict arises. This work demonstrates our deep understanding of the legal frameworks surrounding protected species and reintroductions and knowledge of the impact of human-wildlife conflicts and the importance of resolving such conflict.

### **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?**

Species reintroductions are a vital tool in achieving the UK national nature recovery goals. In terms of biodiversity intactness, the UK is in a particularly dire state compared to other European countries and rapid progress is urgently required.

When carefully planned and well considered, reintroductions can provide unique solutions for nature recovery in, for example reinforcing a declining distribution edge (for example Hazel Dormice) or as stepping stone populations to speed up recolonisation (such as Pine Martens) or to restore a gap in ecosystem function (for example Red Squirrel). In situations where the species has been completely extirpated from Britain, reintroductions offer the only solution to bring back a native missing species (such as Beaver or Lynx). Reintroductions can support individual species recovery but also have much broader ecosystem benefits. By replacing the missing links, the ecosystem is 'rebuilt' and ecological processes such as trophic cascades can be reinstated.

The ultimate goal of reintroductions must be the re-creation of a fully functioning ecosystem in the UK. This needs to be reflected and imbedded in any reintroduction policy and targets, rather than a focus only on individual species. Within this overview and general aim, the use of targets can be impactful as a tool to encourage momentum and accountability within

government bodies. The specific targets may be designed to form part of the 2030 species abundance target (Section 3 of the Environment Act 2021), and fulfil the obligation of the Secretary of State to set a long-term target relating to biodiversity which is one of four stated priorities.

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

The DEFRA 'Reintroductions and other conservation translocations: code and guidance for England (2021)' provides a country level interpretation of the international IUCN guidance. The IUCN and the DEFRA guidance both give comprehensive guidance as to the assessment of the suitability of species and site and appropriateness of release. Within both sets of guidance there is also consideration of the scale of the planning required so as to be appropriate to the socioeconomic or ecological impact of the species being proposed for release.

These guidelines are well established and provide a widely recognised basis for project consideration, development and implementation. Implemented correctly they address the 'right species in the right place'.

Within the UK (or at a devolved level of England/Scotland/Wales/N. Ireland), some species have national working groups and plans which can provide guidance as to the 'right species in the right place', however most species do not have an overarching plan for reintroduction. Irrespective of the existence of a national plan, however, almost all successful reintroduction projects have been achieved through a collaborative 'bottom-up' approach. This has involved organisations at a regional or local level identifying species potential alongside release sites and set in the context of a knowledge of the local socio-political situation. Where there is a national plan, these locally conceived projects often 'fit into' the plan but are often not initiated as a result of the plan. National plans can play an important role in describing the bigger picture and in considering priority areas, but any national plan should be designed to maximise the success of 'bottom up' impetus, which captures local knowledge and relevance rather than instigating a top-down identification or even restriction of sites.

A well-planned reintroduction can offer the opportunity for extensive multi-partner working which takes advantage of wide experience and knowledge and this is particularly important for species with a greater ecological or socioeconomic impact. But a successful reintroduction can also be achieved through smaller scale actions such as a local community project planting species grown from seed to fill local gaps in distribution. The IUCN and country level interpretation of the guidance already recognise and capture the need for different scales of planning. We would propose that any new policy guidance should be overarching and supportive of different scales of reintroductions and be supportive of the adherence to existing guidance. Where species specific national plans exist, they should help to simplify and support the process, rather than be overly restrictive.

The government could potentially fill a role of knowledge sharing towards achieving best practice. Reintroduction mechanisms and success of knowledge sharing varies across species and is influenced by a range of factors, such as; the organisations working on the species, the

practical difficulty of a particular reintroduction or existing pathways to success amongst others. A collective forum might support this.

Maximising benefits of species reintroduction should therefore be focused on their means to contribute to the ultimate goal of re-establishing full ecosystem functionality in the United Kingdom in the long term. A natural capital approach could be a useful way to track benefits and maximise impact of species reintroductions. This is consistent with the ENCA (Enabling a Natural Capital Approach) published by Defra in 2020 and the inclusion of natural capital accounting within the Office of National Statistics. However, it is critically important for natural capital accounting in this context to be embedded in a broader 'systems approach' to maximising benefits and tracking positive change. Species reintroductions contribute to the resilience and functionality of entire ecosystems, which in turn contribute a huge amount of societal value in the form of natural capital and ecosystem services. This value cannot be reduced to marginal analysis of a single species' direct benefits to humans, so a holistic approach to natural capital accounting, (which incorporates qualitative and quantitative assessments of value) would be most appropriate for monitoring reintroduction benefits to society.

### **3. What role should the Landscape Recovery and Local Nature Recovery Schemes, under the Environmental Land Management Scheme, have in supporting species reintroduction?**

The Landscape and Local Nature Recovery Schemes under ELMS offer a unique and generational opportunity to shift subsidy structures and mechanisms to support both farming and nature recovery. There is an opportunity to financially incentivise real species recovery and biodiversity improvement at a local level.

Many species proposed for reintroduction have broad support across the wider population but can experience lower levels of social acceptance amongst land users whose livelihood might be financially or practically impacted. This is particularly true of meso-predators (such as pine martens), predators (such as lynx) or larger wide-ranging species (such as bison) or where the species has significant habitat based impacts (such as beaver).

We would propose two broad mechanisms be incorporated into ELMS in support of species reintroduction:

#### 1. Payments for species presence.

This would be a direct payment to a landowner/manager for the presence of a species. This could be a detection-based approach such as in Germany where there is a payment for evidence of lynx (generally a camera trap image). Or it could be a 'tolerance' payment within a geographical area based on the monitoring and subsequent estimation of predator numbers in that area such as in northern Sweden.

This system would provide a direct incentive and therefore a 'carrot' approach towards species presence for a landowner. An incentive payment could potentially start to shift the narrative away from certain species being perceived as problematic, towards them being desired and actively encouraged (such as with reintroduction). This might particularly be the case for species which otherwise find it hard to obtain social acceptance among land user groups, but which have high support across the

population - thereby starting to resolve conflict for impactful species through equitable payment by those who want those species to those who are impacted by them.

Such incentive payments do not need to be restricted to new or large and charismatic species. They could also be beneficial for species currently experiencing high levels of persecution such as our native raptor species. It could also be not just for single species but for recognition of a land manager hosting a guild of species. This later approach would reward wider ecosystem 'rebuilding'.

Payments that reward species presence could additionally be linked to the public service that they provide. Ecosystem services produced by species such as beavers reducing flooding and improving water quality, or lynx reducing deer grazing pressure on woodland regrowth could be identified and incentivised. This does however result in the payment reward for that species being distanced somewhat from the species itself. A landowner would be being rewarded for the quality of the water rather than for tolerating a beaver colony on their land and this arguably may reduce the impact of changing narrative and conflict reduction. It also becomes quite hard to quantify whether the service provision of a species is proportionate to the 'value' of a species; is a beaver reducing flooding more important than a pine marten controlling invasive grey squirrels? This approach also risks missing many services provided by species which are not currently identifiable, known or quantifiable, and such should not be used at the expense of a broader approach which focusses on rewarding for the presence and existence of species.

## 2. Payments for damage mitigation or compensation.

Some species have an economic impact on (particularly rural) business income and livelihood. This impact can be indirect such as deer browsing reducing woodland regeneration, or direct such as beaver dams flooding arable land or lynx predating sheep. Our existing native species can be the cause of economic impact but for species being considered for reintroduction the potential impact can be seen and felt as a 'new problem' that has to be dealt with by the land manager, adding to their workload and therefore resisted. The incentive payments suggested above would help to ease this resistance, but it is also vital that a land manager feels appropriately supported if significant problems should arise.

Some of the more impactful species remained present across mainland Europe, such as lynx, beaver, wolves, bears, elk and so their economic impact has been historically managed and has developed over time. Although countries vary in their approach, damage mitigation measures are commonly used across the continent and are becoming increasingly relevant as many of these species increase in numbers and expand in range. Learning from other countries' experiences of success and challenges would help refine what might be appropriate for the UK.

For risk reduction of predator impact, mitigation measures can take varied forms such as guard dogs, electric fencing, moderation of farming practice, collars and sound repellents. Beaver impact can be mitigated with dam management, and different fencing protection can be effective to protect domestic birds from pine martens. Some

mitigation actions are more relevant to farming practice in England than others and discussion with farmers groups around practicality is vital.

Across Europe, mitigation is most often part, and sometimes fully, governmentally funded. There is generally a set of criteria or requirements that need to be met to receive mitigation support. This might be signing a contract to guarantee maintenance and use of the materials, it might be that measures need to be in place in advance of any subsequent compensation claims. Sometimes materials but not labour is governmentally funded.

In relation to reintroduced species, as opposed to existing native species, projects often take an active role in supplementing the government support during the transition phase of land managers becoming more familiar with management practice in response to the new species. Projects have funded the gap in government funding, provided technical support and provided officers on the ground to help with set up. Some projects coordinate volunteer involvement to install equipment when labour isn't governmentally funded. It is widely recognised that this project bridging support also helps the development of relationships between projects and land managers. There is extensive experience within Europe and lessons that can be learnt and considered for implementation in the UK.

The involvement of land managers in the pre-planning of reintroductions is vital to allow for the incorporation of ideas but also to build confidence in process and acceptance of change.

The process of compensation for damage is well established in Europe and is generally a very standardised and predictable process. Verifying a claim is usually protocol based and supported by DNA / veterinary evidence. Compensation rates are usually pre-agreed between the government with land managers / farmers. Generally, the full market value is paid by the government and occasionally a percentage extra is also paid to compensate for inconvenience and time. The amount overall that is paid out in compensation by different countries is well recorded and the predictability known. There is a clear role taken by governments across Europe in accepting the role of compensation payment in recognising the need to support the presence and restoration of wild native species whilst supporting farmers and land managers.

#### **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?**

We welcome the 25-year Environment Plan's support of the reintroduction of native and formerly native species as part of the Nature Recovery Network. The ultimate goal of reintroductions must be the recreation of fully functioning ecosystems in the UK and to achieve this, species at all trophic levels need to be reintroduced, including predators such as lynx and large herbivores such as bison and elk. Government policies and guidance needs to be ambitious in its support of such reintroductions and carefully navigate the likely human-

wildlife conflicts which will arise with such reintroductions. Such an approach will support the government in achieving its recently published targets under the Environment Act 2021.

The government should ensure that legal and policy hurdles which currently create unnecessary hurdles to such reintroductions are removed. In particular:

- The definition of “native” in the Wildlife and Countryside Act 1981 should be updated to include formerly native species that are not currently present in the UK in order to facilitate their reintroduction as part of the re-establishment of a fully functioning ecosystem;
- Native and formerly native species should be excluded from Schedule 1 of the Dangerous Wild Animals Act 1976 in circumstances where they are being released as part of a reintroduction programme. This exclusion should apply to lynx, wolves, bison, elk, wild boar and adders. As it currently stands, this legislation likely significantly restricts reintroduction of these species which are vital in creating a fully functioning ecosystem; and
- Consideration should be given to the limits currently placed on the natural grazing of semi-wild large herbivores (such as various hardy breeds of cattle and horses) which are currently classified as livestock and therefore subject to onerous animal welfare and health obligations.

It is helpful to now have the English code to provide a country level interpretation of the IUCN guidance. More clarity around the use of the documentation and where necessary the licencing process and requirements would be helpful. This could be as written guidance, but it could also take a more learning, collaborative format such as government hosted training or information events on the use of the documentations and the processes.

As described, many reintroductions are ‘bottom up’ approaches initiated and led by NGOs and interested parties and the English code and IUCN guidelines provide an excellent framework for planning and implementation. Any government support should be aimed at supporting appropriate use of these guidelines and be wary of adding additional bureaucracy from a remote level, to what is already a highly bureaucratic process.

**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?**

Funding for feasibility and consultation processes is particularly hard to access. Often funders are willing to fund the ‘actual’ reintroduction, but the less tangible and unpredictable groundwork of planning and consultation is less appealing. However, thorough planning and consultation are vital for the success of any, but particularly the more complex or high-impact reintroductions. Funding support to enable these aspects would be incredibly helpful in improving the number and effectiveness of reintroductions.

Sharing knowledge of best practice is critical for the development and implementation of social consultation processes. As described in our response to question 8, this could be enabled by funded support of a platform for practitioners to share and discuss effective engagement and consultations strategies.

As described in our answer to question 3, conflict often arises when a way of life or social practice is or seems to be threatened, and this often has a financial basis. Incorporating financial incentive into the new ELM schemes could make a substantial difference and shift the discourse from threat to opportunity. It would also move the conversation from being centred around a local challenge, towards a bigger picture of government-facilitated opportunity and improvement of our shared ecosystems.

The IUCN guidelines recognise that scale of consultation will vary in response to the potential impact of the proposed reintroduction. This therefore results in no consultation being necessary where there are no predicted impacts. Some examples of this might be the reintroduction of a sundew plant grown ex-situ and then planted into a privately owned bog, or the captive breeding of a butterfly species for local release on a meadow. However, there is still likely to be local interest and it is important to capture this enthusiasm through informing and engaging the local community wherever possible. Reintroductions can offer hope for change and a solution to the biodiversity crisis and there is a responsibility to use these projects as mechanisms to inspire and lead change. We would suggest that the government also has a role here to lead a national campaign of engagement and provide clear leadership and direction in starting to increase awareness, acceptance and move the shifting baseline syndrome.

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

Reintroduced native species should be protected from persecution from the time they are first released in the UK. This is important to ensure that the animals are able to establish themselves in the wild as a viable population and become part of a fully functioning ecosystem. Without such protection, there would be nothing stopping the animals being e.g. lethally controlled as wild animals by landowners when they enter onto private land. Depending on the species, this may be as part of a long-term management plan and for others, this may be long term protection as a European protected species under the Habitats Regulations.

As part of any management plan, the government must have in place effective measures to monitor the population status of any reintroduced species. In many instances, this is already a practical necessity in order to comply with the legal obligations in the Berne Convention (e.g. Articles 2, 7 and 8) and the Habitats Regulations (e.g. Articles 50 and 55(9)(b)), to ensure that populations of relevant species are maintained at appropriate / favourable levels.

Many reintroductions are structured as projects, even when hosted within an organisation and this is largely driven by funding opportunities. Funded projects often have a finite term of 3 to 5 years and this creates a challenge for long term management. Projects often find solutions to this such as long term volunteer groups, or continued internal funding within other aspects of the organisation but it can also lead to long term monitoring and management being absent or not as effective as it could be.

A solution might be for each species or taxonomic group to move into a centrally funded national monitoring and management plan once the project is past the 'reintroduction' phase and is an extant species.



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

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

Collaborative best practice sharing is already happening at varied geographical levels for many species or taxonomic groups or across species through varied platforms such as conferences or working groups. There would be an advantage in a more systematic approach to this and there is a gap at the national level. A government funded national knowledge sharing forum such as a conference would be ideal for this. Often collaboration is through ‘word of mouth’, but this would be improved if an organisation were to be able to easily access contacts and knowledge of other similar reintroductions. A national database of reintroductions would serve this purpose. With appropriate funding, the Lifescape Project would be willing to host a national level conference and/or a database of reintroductions.

Many reintroduction projects in other jurisdictions, particularly of more controversial species are often funded substantially by government in response to meeting commitments and obligations e.g. to ensure that populations of relevant species are maintained at appropriate / favourable levels under the Habitats Regulations . This financial support gives public recognition of governmental commitment and leadership in the role that reintroductions play in supporting individual species recovery and also ecosystem recovery. We would encourage increased governmental leadership, voice and funding support in effecting positive change for ecosystems through species reintroductions.

### **Overall recommendations:**

1. Increase opportunity for knowledge sharing, particularly with Europe, through funding or creating a platform such as a **regular conference and national database**.
2. The current code and guidelines provide an excellent base for planning and implementing reintroductions. We would suggest that further bureaucracy is not necessary, but it would be helpful to have **an interface with government which provides guidance and training on use and processes**.
3. ‘Bottom-up’ reintroduction projects can be very successful and should be supported by **the government taking a role in leadership and voicing support of these actions** to mitigate the biodiversity crisis.
4. **Funding support**, particularly for the more difficult to fund aspects such as community consultation is vital.
5. The opportunity for change that ELMs represents should be used to facilitate the change to a more diverse ecosystem and reintroductions should be embedded within this with **incentive payments** moving the narrative to increase acceptance and with **mitigation and compensation** to provide a support to this transition.
6. **Key legal obligations and policy statements** which are currently hurdles to reintroduction should be amended or removed.