**Written evidence submitted by The Game and Wildlife Conservation Trust (GWCT) (SR0034)**

The Game & Wildlife Conservation Trust (GWCT) (www.gwct.org.uk) is a leading, independent UK wildlife conservation charity conducting scientific research into Britain's game and wildlife to enhance the British countryside for public benefit. We use our research to provide training and advice on how best to improve the biodiversity of the British countryside. We employ post-doctoral scientists and other research staff with expertise in areas such as birds, insects, mammals, farming and farmland ecology, fish and statistics. We have been involved in species reintroductions/recolonisations such as Water Vole, Grey Partridge and Black Grouse and consulted on the implications of the introduction of others such as pine marten and beaver.

**Introduction**

The GWCT welcomes the return of native wildlife of all species and supports reintroduction as an important element in achieving this, provided that International Union for the Conservation of Nature (IUCN) guidelines on reintroductions are properly adhered to. This is a key part of our message. The IUCN guidelines require the formulation of an exit strategy and an ongoing monitoring programme as part of a scientific evaluation which is later published. These are reinforced by Defra's guidelines[1]. Both are important in addressing concerns by those impacted by the reintroduction; indeed as Defra states "*a mutually agreed exit strategy can also help address concerns for anticipated problems*". We are concerned that continued monitoring and the formulation of an exit strategy have not been adequately demonstrated in many reintroduction projects to date and that mitigation strategies are often limited by legal protection and the uncertainty created by the release of predatory creatures that could become a by-catch of legal predation management.

We also sound a note of caution that much existing wildlife is in decline. Reintroduction of headline making species can be very expensive, and we question whether in some circumstances the money could be better spent supporting the recovery of existing species and their habitats.

**Call for evidence**

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 recovery and reintroduction can play a significant role in restoring biodiversity, but the relative importance of each approach is key. In some cases, species have been lost from our ecosystem for decades (even centuries) and so their reintroduction would be a necessary part of achieving Government goals. However we express a note of caution that in these situations, the appropriateness of the reintroduction (i.e. the cause of the original extinction e.g. predation by an non-native invasive species such as the impact of the American Mink on the Water Vole) and the likely ecological effects (e.g. will the reintroduction affect the prey:predator balance or impact on existing priority species?) must be fully assessed in accordance with IUCN guidelines. (We address this further in the context of species recovery in answer to Q2).

[1] Reintroductions and other conservation translocations: code and guidance for England May 2021

Setting Government targets for reintroductions implies that Government is confident that IUCN guidelines can and will be met by each individual proposed reintroduction. If this is not the case, then setting targets is arbitrary and not acceptable.

Targets should be split into an end target (the end goal), and sub-targets which need to be met to keep the project on track to the end goal. Where one of the sub-targets cannot be or is not met, this should be used as an opportunity to re-assess the overall approach and the end target and adjust if necessary or follow a pre-defined exit strategy. With reintroductions one of the key challenges is to define beforehand when to stop reintroducing a species and what to do if the original aim was not met by the time predicted.

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

The answer to the first part of the question is simple: follow IUCN (and Defra) guidelines. Monitoring the success and impacts of reintroductions and the development of mitigation and exit strategies are elements that need to be effective. As we have observed in the Introduction these are not, in our opinion, fully followed through in many of the reintroductions. Defra guidance suggests that monitoring and evaluation should continue until the population is stable/behaving in a predictable way or has failed or the exit strategy is implemented. It appears to us that most projects do not seem to monitor beyond the first year after release. This is particularly problematic when predator and prey both naturally occur at low densities and so impacts on vulnerable prey species may go un-noticed.

Lack of on-going monitoring also reflects that one of the main problems in reintroduction projects is how to define success. Many reintroductions are considered successful if the species in question is still alive one-year post-release. However, real success is when the reintroduction leads to a self-sustainable population (and hence successful breeding) that does not require further releases. To be able to assess this correctly, we suggest at least 10 years of post-release monitoring is necessary in short to medium-lived species (such as Galliformes and songbirds). For longer lived species or those who do not breed in their first year this will almost certainly have to be more than 10 years (such as long-lived waders or larger carnivores like Lynx for example).

In addition, we feel there should be more emphasis on approaches that focus on a species recovery based on natural expansion after a successful reintroduction e.g. the Pine Marten. This may not be headline grabbing or achieve quick 'visible' results but it would be more appropriate in that it would build upon the natural behaviour of the reintroduced species. Such an approach would be encouraged by reintroduction strategies including a meta-population approach where several populations are established simultaneously in such a way that natural recolonisation in-between those areas (but from those areas), leads to overall connection between all populations.

If a reintroduction of one species risks negatively impacting on another species, especially those also targeted through nature recovery funding, then this would be counter-productive, and the reintroduction should not be Government-funded. For example, there are plans to reintroduce European Wildcat and Pine Martens to the south of England, where red-listed breeding waders, like Curlew and Lapwing, are fast-declining due to high

predation pressure from common predators like foxes (which can be controlled) and badgers and birds of prey (which can't be controlled). The existing problem of how to mitigate against the impact of protected predators on declining prey species is already a major problem to bird conservationists and adding more medium-sized predators to the landscape will not be helpful. However, we should emphasise that the reintroduction examples presented here are based on prioritising existing conservation objectives (of say waders) over the reintroduction of predatory species. In other situations, the introduction of predators or keystone species may be beneficial. It is a matter of priority; this should be an important aspect of Government reintroduction policy and requires 'joining up' these ambitions with other conservation objectives and targets (such as those in the Environment Act).

With regard to right species, right place, again the IUCN guidelines provide the all-important guidance. There is concern that some reintroductions are being driven by public appeal such as Beaver, Pine Marten and Wildcat - rather than an 'ecological replacement'[2] where the species is a necessary part (often termed keystone species) of the restoration of an ecosystem of a given habitat e.g. Species reintroduction | The Wildlife Trust for Lancashire, Manchester and North Merseyside (lancswt.org.uk)

Secondly, we would also call for caution on introducing species to aid their recovery in parts of their range where densities are low (often termed 'reinforcement'[3]). The GWCT has been involved in expanding the range of both the Black Grouse and Grey Partridge (the latter following the IUCN guidelines on Galliformes reintroductions) through both reintroduction and reinforcement. Our research demonstrated that where there is a remnant wild population, introducing captive reared individuals is likely to have negative impacts on the genetic integrity of the remaining locally adapted wild stock - Re-establishing grey partridges through releasing - Game and Wildlife Conservation Trust (gwct.org.uk). In the case of the Black Grouse, we translocated male stock from areas in the North Pennines where the existing wild population could sustain the removal of breeding males and moved them to areas in the Yorkshire Dales where there had been recent evidence of active 'leks' (essentially a site where male animals of the same species gather and display to attract females). Our research had shown that female Black Grouse (hens) disperse further than males, hence there was no need to translocate females.

Government must also recognise that the 'correct place' for a reintroduction may become somewhat irrelevant once the successfully reintroduced species naturally expands its geographical range as the population grows. In addition, for some avian species, such as White-tailed Eagle, there is rarely likely to be a 'right place' as birds are highly transient. This complicates things in terms of feasibility studies particularly when it comes to gathering views from potentially affected stakeholder groups. For example, the released White-tailed Eagles from the Isle of Wight are now occupying areas where the views of local shepherds, for instance, were never sought.

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[2] Reintroductions and other conservation translocations: code and guidance for England (publishing.service.gov.uk)

[3] ibid

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

   ELMS could be helpful in reintroducing farmland birds like Tree Sparrow and Corn Bunting to former haunts where ground conditions have been restored (for example through AES measures) but where the likelihood of natural recolonisation occurring due to its low dispersal ability is remote or even impossible.

   In addition, ELMS could support the restoration of habitat to allow for an introduction to be considered successful such as nesting (including nest boxes for cavity breeders) and foraging habitat in the case of the Tree Sparrow and Grey Partridge. Arable farming options such as unharvested cereals, wild bird mixes and beetle banks have the potential to support Grey Partridges and other farmland birds where they have become locally extinct e.g. Corn Buntings were recently declared extinct on the Isle of Wight, but they could be reintroduced into areas with suitable habitat and Government funding would provide an incentive for this. In addition, in the case of ground-nesting species reintroductions such as waders, predation management must be part of the recovery/reintroduction programme as high predation pressure is a significant factor in wild population decline. Consequently, we regard it as vitally important that predation management is included as an ELMS funded option for species recovery, where it is also combined with habitat creation and improvement and other appropriate management measures.

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?

   Whilst the Defra guidelines complement and reinforce the IUCN guidelines, we question why the monitoring and risk reduction/exit strategy elements are limited in actual project delivery. We suggest this is lack of oversight rather than guidance.

   In addition, where a mitigation strategy involves the removal or control of the released species there must be put in place an effective process for obtaining the necessary licences if required. The full protection of species makes this process more complicated and as a result it is usually unaddressed by the reintroducers. GWCT believes that Defra/Natural England, as the relevant authorities, must ensure that this point is addressed before any further reintroductions are sanctioned. This could take the form of a wildlife management licence based on approved methods of lethal control.

   We also wish to bring to the Committee's attention the problem that the reintroduction of small predatory species presents to the legal use of kill-traps. As reintroduced populations expand, predators such as Pine Marten will become a by-catch risk for legal predation and pest control. The drive to plant trees to capture carbon is likely to see the need for an increase in the lethal control of Grey Squirrels to protect them, whilst the deployment of spring traps set in tunnels to catch Mink, Stoats, Weasels, and Rats is a crucial part of the conservation of some ground-nesting species, and for the wider control of rats on farmland particularly where secondary poisoning through the use of rodenticides is a risk. In these situations, there is a substantial risk of the capture of Pine Marten in traps that are not legally approved for them. Whilst this may or may not impact the success of a reintroduction programme, it brings serious legal concerns for trap operators, who are at risk of being

accused of/prosecuted for recklessness if a Pine Marten is caught in otherwise perfectly legal activities. Consequently, in areas where Pine Marten release is targeted, and as the population expands, trap operators will need to be informed and tunnel excluder configurations altered accordingly, which will reduce captures of Mink, Grey Squirrels and Rats, and therefore limit the value of traps to help protect ground-nesting birds, trees, crops, food stuffs and to mitigate against rat-borne diseases. But again, this is a matter of how priorities are set in the first place. It is also a good example of the cause and consequences that need to be fully understood when approving reintroduction projects (see also Q6 below). The best way to ensure that as many points as possible are considered, is to form a National Species Reintroduction Committee that consists of experts from different ecological disciplines along with practitioners which evaluates and decides on each submitted project.

Further, GWCT is aware that the risk of accidental capture of Pine Martens in kill-traps in North Wales, has resulted in some gamekeepers abandoning the use of traps to control Rats, instead preferring to use now more rodenticides with all the attendant problems this can bring. The irony here, is that Pine Martens (and Owls and raptors) are now at greater risk of consuming contaminated rats and mice.

Government guidance is urgently needed on trap choice and what constitutes a reckless act. In addition, careful consideration should be given to who will be responsible for funding changes to existing trapping practices, especially given that so many trap operators recently swapped to expensive Agreement on International Humane Trapping Standards (AIHTS) compliant traps, due to Government implementation of the AIHTS.

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?

Both the IUCN guidelines and Defra guidance include the requirement for a public relations programme given that the benefits and costs will vary amongst those involved or impacted. These therefore recognise that it is crucial to ensure that those who are required to live with reintroduced species can fully embrace them.

A key part of this is making sure that they are confident that there are plans in place at the start that will allow them to deal with any problems, whether perceived or real. It is also important to understand that successful reintroductions will result in recolonisation by species that may have a negative impact on some people's interests into the long term. Having a mitigation plan in place that gives stakeholders confidence that possible problems can be addressed in a simple and practical way is crucial to acceptance. We are aware, for example, that local gamekeepers have expressed enthusiastic support for proposals to reintroduce Hen Harriers as a breeding species in southern England, because they are aware of the increasingly successful Hen Harrier brood management scheme in the north of England.

On the other hand, reintroducers saying that they can always deal with a problem animal, because it has a radio on its back and is hence easily located is clearly short-sighted. Apart from tag failure (which is not uncommon), successful reintroduction means establishing a wild breeding population (see also further above), and the offspring may be difficult if not

impossible to trace. Long term planning is essential, and some recent reintroductions have failed on this aspect of IUCN guidelines.

It is important to properly consider the scale of the landowner, community and stakeholder engagement and consultation process relative to a reintroduced species likely mobility. For example, White-tailed Eagles are highly transient. GPS-tracking data of eagles recently released on the Isle of Wight, shows individual birds to have temporally and permanently settled far away from the release site, and where the views of relevant stakeholder groups (e.g., sheep farmers, pig farmers, game managers and bird reserve managers) were never sought during the initial consultation process. Government and conservationists promoting their recovery, must also be mindful that some mammal species flagged for further reintroductions, e.g., Pine Marten, European Wildcat, are quite capable of long-distance dispersal and so the whole of the UK should be considered in the plan.

Finally, monitoring of a reintroduced species post-release should include monitoring of their impacts. For example, the impact that reintroduced predators will have on vulnerable prey species, especially those already limited by high levels of predation, like breeding wading birds. In such situations the reintroduction plan should include a fair assessment of the expected impacts on other species, arguably especially in the case where generalist predator species are reintroduced that may impact on other red-listed species (see also Q6). This level of monitoring will be expensive, but it should at least be an important consideration of a reintroduction schemes. If post-release monitoring showed potentially negative impacts on prey species, there must be an effective and invokable exit strategy.

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

Complicated legal protection is unhelpful. If IUCN guidelines are properly met, we can expect reintroduced species to do well. If this is the case, there should be no need for complicated legal protection. The expanding Beaver population in Tayside is a case in point. Until recently any landowner with a problem was at liberty to kill Beavers and remove their structures, and many did so. Meanwhile, the population continued to grow and expand its range despite this. Giving them European Protected Species status (now in England as well) simply alienated farmers and landowners who see no need for this. We are concerned that this inevitably increases the likelihood of illegal control activities.

In similar vein, GWCT does not believe that Pine Marten reintroductions have ever met IUCN guidelines. Their legal status under the AIHTS and as a Schedule 5 and 6 species under the Wildlife and Countryside Act 1981 makes it well-nigh impossible to develop a trapping regime that would allow control if problems arise, even under licence. See our position statement on Pine Marten reintroductions - Re-introduction of pine marten in England - Game and Wildlife Conservation Trust (gwct.org.uk)

Further, since the 1990's Red Kites have been successfully reintroduced into several areas of Britain, and they are now present in every county. This is commonly regarded as one of the UK's greatest reintroduction/conservation success stories, including by Natural England. Meanwhile, many of Britain's breeding wading birds in the lowlands, notably curlew and lapwing, have undergone long-term declines and populations are failing to recover even on

sites with optimal breeding habitat and effective legal predation management. Red Kites are now regarded as a major predator of wader chicks – especially for Lapwing, an internationally declining species. For example, so problematic has Red Kite predation of Lapwing chicks been at the RSPB's Otmoor Reserve in Oxfordshire, that they now have in place a diversionary feeding program to mitigate against unsustainably high levels of chick losses (Mason et al. 2021 Experimental diversionary feeding of red kites Milvus milvus reduces chick predation and enhances breeding productivity of northern lapwings Vanellus vanellus - ScienceDirect). This example highlights the very serious impact a reintroduced predator can have on a vulnerable prey species. Whilst it is great that the RSPB has found a potential solution to the Red Kite predation problem on its reserve, it is unrealistic to expect private landowners and farmers to orchestrate and fund such a scheme. Further, it may explain why (a) wader productivity remains below the threshold required for population stabilisation and recovery, even where good breeding habitat and legal predator control occurs, and (b) disillusioned wildlife managers sometimes resort to illegal control of raptors. It is therefore imperative that, where predator reintroductions are planned, there are measures in place to allow wildlife managers on private landholdings to have confidence that they can mitigate against reintroduced predator impacts, without falling foul of the law.

These examples also demonstrate another point; the need for long term management plans to fully monitor any damage/impacts caused to continue to build the evidence base. This is particularly important as the negative impacts are likely to increase as the reintroduced species population grows and spreads. There is concern for example that the river-engineering benefits of Beavers promoted by their introducers may be countered by impacts on migratory fish species (spawning grounds) – and indeed in the longer-term result in flood damage rather than prevention given the situation in some European countries – see for example https://www.aloki.hu/pdf/1706_1563315642.pdf

The formation of a National Species Reintroduction Committee (see Q4 above) would also help to improve approaches to the long-term management of reintroduced species.

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

There is need for a more thorough investigation into illegal releases and the proper imposition of penalties when culprits are caught. The GWCT is seriously concerned that the Pine Martens, which are spreading across the New Forest, are clearly the result of illegal releases, and that their genetic origin is likely to be highly questionable. They therefore pose a significant threat to the genetic integrity and health of pine martens from licensed releases in the longer term. This example is especially relevant, as this particular population is being promoted and supported by Government, through Forestry England.

Government should also consider investing time and money in educating the public, including at school level, on the role of reintroductions and the importance of following IUCN/Defra guidelines in minimising impacts.

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

   Adequate management post-release is expensive and plans need to be in place, with funding allocated before reintroduction takes place.

   There are many examples from across Europe, see for example Beaver, Lynx, Wolf and Bear. In all cases, masses of public money are spent on public awareness, damage compensation (loss of livestock or infrastructure such as beehives and flood defences), infrastructure to deal with problems associated with the reintroduced species and public rubbish bins, etc. Here in the UK we seem to think that you can let things go, and leave those who are negatively affected to deal with any problems at their own expense (see also comments above in relation to beavers in Scotland). Consequently, there is a lot we can learn from the successes and failures of reintroduction projects across Europe. Again, the formation of a National Species Reintroduction Committee would ensure that those lessons will be considered, because of expertise and the national and international contacts the Committee's expert members automatically will bring to the table.

   ***13th January 2023***
   ***Game & Wildlife Conservation Trust***