

15th November 2021

Dear DEFRA,

Thank you for your invitation to consult on your approach to beaver reintroduction and management in England.

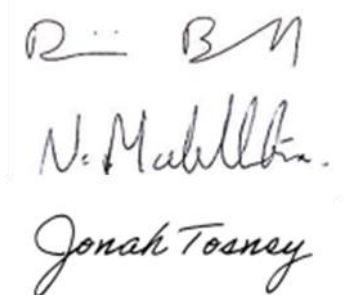
The signatories of this letter represent the three holders of existing beaver reintroduction licenses in Norfolk and as such have first-hand experience of planning, implementing, and managing beaver reintroductions.

We fully support the decision to licence the release of beavers into the wild in England and agree in part with the proposed approach. However, we hold significant concerns over the onerous licencing conditions proposed in the Consultation Document which we believe will deter applicants and thus fail to achieve the result which is intended. In particular:

1. The combination of the requirements for 1) projects to last for a minimum of 5-10 years, and 2) projects to appoint a Local Beaver Officer will be extremely prohibitive. The appointment of even a part-time Local Beaver Officer for 5 years is likely to cost around £100k. We would suggest that either project durations are reduced, the requirement for a Local Beaver Officer is replaced with a requirement for a representative that covers a much larger area (e.g. multiple catchments, region, or county), DEFRA commit to funding this role, or all of the above.
2. The requirement to have an existing funding commitment for at least 5-10 years is not at all consistent with most grant-making processes, thereby preventing projects from taking advantage of blended finance. This is also inconsistent with other legal reintroductions licensed by Natural England. This requirement is therefore likely to be prohibitive for the vast majority of projects. We suggest that project durations are reduced and the need to demonstrate an existing funding commitment is only required for Year 1 and 2 at most.
3. The requirement for the reintroduction partnership to be responsible for managing financial impacts of beaver activity is unreasonable, not consistent with other legal reintroductions licensed by Natural England, and would set a dangerous precedent of peer-to-peer transactions between landmanagers that would be impossible to arbitrate. This feels poorly thought through given there is no mention of how impacts would be measured, costed, or arbitrated, or the polarisation between stakeholders that this could cause. We suggest this requirement is struck out entirely or DEFRA commit to funding it.

In aggregate, therefore, we find the proposed approach to beaver reintroductions into the wild extremely onerous and prohibitive. To put this into perspective, each of the three existing beaver reintroduction projects represented by the signatories of this letter hold long-term ambitions to move from enclosed to wild release projects. However, the current proposals are so prohibitive that none of us would feel able to proceed without significant changes to this wording. If those that have led the way with enclosed releases feel unable to participate, it is possible that DEFRA's proposals stifle rather than enable a national approach to reintroductions.

Yours Sincerely,



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Co-owner & Manager, Wild Ken Hill

Nigel Middleton
Sculthorpe Moor Reserve Manager, Hawk & Owl Trust

Dr. Jonah Tosney
Operations Director, Norfolk Rivers Trust