



Afonydd Cymru's response to the targeted stakeholder engagement on the proposals to amend the legislative framework to protect European beavers (*Castor fiber*) in Wales.

March, 2025.

Targeted engagement questions

We welcome your representations or objections to the proposed amendments to the legislative framework around European beavers in Wales, in particular:

Question 1: Do you support the proposal to move European beaver from Part 1B to Part 1A of Schedule 9 to the WCA 1981? Please explain your position setting out why you agree/disagree with the proposed amendment.

Yes, but only when a coherent and adequately resourced management plan has been consulted upon and is in place. Currently, beavers are being released into the wild illegally with apparently no attempt at enforcement action. This change to the legislation would be seen as condoning this illegal activity and could encourage further "beaver bombing."

Question 2. Do you support the proposal to include European beaver in Schedule 2 of the Habitats Regulations? Please explain your position setting out why you agree/disagree with a proposed amendment.

No, whilst AC is not against the reintroduction of beavers, we believe that giving beavers protected status will make it much more difficult to control and mitigate those instances where beavers cause adverse impacts. There is plenty of evidence from Scotland and Europe that beavers not only bring environmental benefits but also can cause significant adverse impacts. The proponents of beaver re-introduction tend to overplay the former and underplay the latter.

Question 3: What do you see as the primary impacts (positive or negative) of these proposals to your sector?

Positive impacts: Flow attenuation, retaining water in dry conditions, possible reduction in nutrients, increased wetlands and increases in associated biodiversity.

Negative Impacts: Obstruction to the up and downstream migration of salmon and sea trout. Alteration to small stream morphology and hydrology resulting in loss of spawning habitat and possibly negative alterations to juvenile salmon and sea trout nursery habitat. There is research showing some advantages for trout resident in the affected reach, but not for salmon or sea trout, or potentially for trout populations at a catchment scale. One of the key pressures in fresh water on juvenile migratory salmonids is water temperature and a mitigation measure is more bankside tree planting. We have concerns that beaver reintroductions could result in an overall reduction of bankside vegetation and the destruction of bankside tree planting initiatives. As beavers colonise wooded streams, there is also a concern that, without a practical management scheme, landowners may cut down trees to avoid attracting beavers to their property, as occurred in Tayside.

These actual and potential negative impacts must be taken seriously given the current critically low stocks of salmon and sea trout which in the case of the salmon is predicted to be heading towards extinction in many Welsh rivers during the next 10-20 years. It would be inexcusable to sanction the reintroduction of one species only to accelerate the demise of another. This could be managed if there is there was a robust and resourced management regime, avoidance of reintroducing beavers to areas critical to the freshwater survival of migratory salmonids and the ability to take rapid action where negative impacts occurred. This would be greatly facilitated if beavers were not granted protected status.

Question 4. Are there other amendments to legislation that you think should be considered in relation to European beavers in Wales? When considering this question please include any reasons behind why European beaver would be better protected under alternative amendments

Many protected sites, such as river SACs, will be affected by the managed reintroduction of beavers. Consequently, a Habitats Regulatory Assessment should be carried out. This would seem to fall within the broad definition of a plan under the Habitats Directive.

Question 5: How would you like to be involved in the development of a beaver management framework in Wales?

The Rivers Trust movement is currently carrying out the majority of the on the ground improvement works to rivers in Wales. It is therefore critical that we are consulted and engaged in the development of any management framework that needs to be put in place for the successful reintroduction of beavers. It bears repeating that whilst understandably those who want to see their reintroduction are focussed on the benefits AC and the Rivers Trust can advise on how beavers can be reintroduced in a way that is

compatible with other initiatives to improve the health and quality of our rivers and in a way that minimises their impact on vulnerable species such as migratory salmonids.

Question 6: What, in your opinion, would be the likely effects of the proposed amendments to the legislative framework around European beaver in Wales on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

AC does not have a view

Question 7: In your opinion, could the proposed amendments to the legislative framework around European beaver in Wales be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

AC does not have a view

Question 8: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

As part of a robust and resourced management framework is the need to ensure that where beaver damage is caused there needs to be consideration of compensation and who will pay for this. See below a quote from an EFRA Committee looking at Species Re-introductions. Afonydd Cymru would recommend that serious consideration is given to adopting the type of management measures set out in paras 53-57 below.

53. We have seen first-hand in Bavaria that crop damage compensation and mitigating works, such as substantial structural changes to the drainage system, were major calls on the public purse, requiring bold decisions and significant funding. The annual budget for compensating farmers for damage to crops such as maize and sugar beet amounted to €450,000 alone. We also saw the benefits of rapid response consultants. We believe that this approach, in combination with a government funded compensation scheme, is the best way to mitigate concerns and provide reassurance to land managers potentially impacted by high-risk reintroduction projects. Where populations are already established, the case for

establishing a management process should be urgently considered, with priority given to species with protected status.

54. The Government should implement localised control and management systems by forming and funding a network of rapid response consultants by 2026. The rapid response consultants should be members of the local community and be empowered to make prompt decisions on the remedial action to be taken where problems caused by reintroduced species are identified. The framework for creating these networks should be included in the strategy called for above.

55. Those affected by the reintroduction of species, including farmers and land managers, must have access to sufficient support and funding to prevent and deal with potential negative impacts. Budgetary provision should be made for this as part of the Government's reintroduction strategy. The framework for this provision should be included in the strategy outlined above.

56. If a reintroduced species is to be given protected status (as in the case of beavers), a risk assessment and management plan should be in place in advance of the protected status being granted.