

1. **Do you agree with the reintroduction policy and that the Environmental Report has correctly identified the potential impacts and appropriate mitigation? See Sections 4 and 5 respectively.**

Yes, No, Unsure

We believe this question is asking two things and we have therefore considered them separately, answers provided below.

Despite the unauthorised release of beavers in Tayside, Scottish Land & Estates (SLE) recognise it unlikely that the Scottish Government was ever going to advocate the full removal of beavers from the area with competing views from wildlife and land management organisations.

While SLE recognise and support the biodiversity benefits beavers can bring, the proposal to allow beavers to remain in Scotland needs to be considered against the impact on existing land-based businesses with those impacts mitigated where necessary. It should not be the case that conservation benefits are solely promoted without recognising the consequences on a working countryside.

SLE believes that the Scottish Government's reintroduction policy takes a reasonable approach in acknowledging and addressing these concerns and establishes a pragmatic and rational approach. However, to prevent serious damage to land uses (agriculture, forestry & fisheries) it is paramount that the reintroduction policy is fully supported by a comprehensive management framework and that appropriate long-term funding mechanisms are put in place to help land managers mitigate beaver damage.

SLE is a member of the Scottish Beaver Forum and whilst we are reasonably content that the licensing guidance and other associated documents being developed will provide landowners with the advice needed to undertake mitigation measures we do however remain concerned about the available funding mechanisms which will be in place to support these measures. Therefore, until we see a completed version of the framework and further detail on the available funding mechanisms we remain apprehensive about the practical delivery of the policy.

With regards the second part of the question overall SLE believes the Environmental Report appropriately identifies the potential impacts and appropriate mitigation for some but not all of the topics considered. We have provided further detail on each of the sections below.

Biodiversity

SLE is confident the Environmental Report identifies the potential impacts beavers might have on the biodiversity of the natural environment in respect to Natura sites in the two beaver areas – Argyll and Tayside, and we welcome the consideration the SEA gives to the conservation interests of species and habitats in the wider countryside.

We believe SNH will need to think carefully about how it will continue to deliver ongoing designated site maintenance support particularly for those landowners who have sites which are experiencing negative effects because of beaver activity. As stated above funding available to support mitigation measures will be an absolute necessity.

Population and Human Health

SLE feels this section is very limited in detail, particularly regarding the interaction of beavers with the human environment. The report itself states that there is the potential *“for impacts on built-up areas, roads, rail and other infrastructure that are hydrologically lined to areas used by beavers”* however this section of the report gives no consideration to these factors. Confusingly they are considered further on in the report under section 4.14.3 – material assets where they are adequately considered.

Cultural Heritage

This section appears well detailed within the report and SLE are confident that both impact and mitigation measures have been appropriately assessed.

Interestingly the report highlights that when ornamental gardens and ponds are connected by waterways they can be radically altered by beavers. It would be helpful to understand where such activity is taking place how this will be viewed in the context of the Reservoirs (Scotland) Act 2011 which places a requirement on landowners to prevent the uncontrolled release of water. We are interested to hear what support will be offered by SNH/SEPA in addressing situations where beavers have caused such breaches.

Forestry

The report acknowledges that there is currently limited information available on the impact of beavers on forestry. Consequently, it will be important to ensure that the management framework developed for beavers remains an evolving process as Scotland continues to learn about the interaction between beavers and forestry, most significantly the interaction between beavers and commercially managed areas of broadleaved tree species. Furthermore, there will also be a requirement to ensure that UK Forestry Standard Guidelines on Forest and Water reflects the new dimension beavers might bring to some riparian zones and the implications this could have in terms of buffer zone location.

Reference in this section is also made on the likelihood of needing to review levels of deer management in those woodlands where beaver and deer live alongside one another. It would be helpful to better understand what monitoring will be undertaken to determine this and how SNH proposes to engage with landowners/DMGs in delivering training and advice on this.

Agriculture

This section provides a good representation of beaver impacts experienced on agriculture land. In addition, we welcome the recognition the report gives to the considerable presence of beavers already present in agricultural areas in Tayside and the conflict this is causing on land management practices.

As members of the Scottish Beaver Forum, SLE is confident that a pragmatic and adaptable management framework is being developed which provides a range of management options and tools which can be used to mitigate against the potential negative effects of beaver on agricultural operations as identified in this section. However as stated above there is a distinction between such tools being available and the application of these tools through the provision by Scottish Government of sufficient long-term funding mechanisms.

One point made which does raise significant concern for us is the attention the Environmental Report draws to the practicability of current mitigation measures used to prevent beavers from burrowing into flood banks. The report very clearly highlights that there is a clear (and we would argue urgent) need to trial different deterrent techniques for mitigating against burrowing. There is therefore a real concern that landowners will not have a full set of management tools available to mitigate and/or prevent burrowing damage caused by beavers when the framework comes into force because these trials have not commenced.

In this respect the mitigation options presented in section 5 of the Environment Report in relation to burrowing (5.3.2) may not be neither commercially viable nor ecologically desirable particularly along extensive lengths of watercourse.

Infrastructure

SLE is confident that the potential effects of beavers on infrastructure is appropriately covered and adequately considers the use of artificial and natural structures covering all likely scenarios.

Fisheries

SLE are content that the Environmental Report has correctly identified many of the potential impacts and appropriate mitigation on fisheries. However once again it will be fundamental that fisheries managers are not only provided with the appropriate tools to undertake appropriate management action but that the resource implication of these have been well considered and are committed.

As well recognising that dams and pond creation have the potential to prevent the free movement of fish to all habitat required during their life cycle, we feel it would have been useful if the report had fully considered the potential and scope for beaver dams to delay salmonid migration.

Mitigation measures

SLE is content the Environmental Report correctly identifies the potential impacts and whilst there is a clear and urgent need to determine practicable mitigation for beavers burrowing into flood banks, overall SLE believes the appropriate mitigation measures have been considered for each of the environmental topics considered.

However, whilst the suite of mitigation measures included are well developed across Europe and North America, it is not necessarily the case that these approaches can simply be translated to a Scottish context. SLE therefore believes beaver management in Scotland needs to remain an evolving process as it is likely that mitigation measures will need to be adapted particularly as populations grow and expand. In this context, we believe it is important that the effectiveness and costs of these measures remain under regular review and are adapted to changing circumstances.

Lastly as stated clearly there is a need to ensure that appropriate long-term funding is in place to help mitigate negative effects from beaver.

2. **What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process? (Please give details of additional relevant sources). See Section 4.**

Very positive, **positive**, neutral, negative, very negative

We consider the evidence set out in the Environmental Report is comprehensive and appropriately informs the assessment process.

SLE does however believe that it would have been helpful if the report had considered data gathered under the Tayside Beaver Study Group (TSBG), particularly as the identification and trial of mitigation measures formed an important aspect of the work of this group. During the TSBG project several forms of mitigation measures were trialled, some with greater success than others. Whilst the Environmental Report touched on experiences from Europe and America it seems imprudent not to have included in the assessment information on tried and tested mitigation measures in Scotland.

3. **What are your views on the predicted environmental effects as set out in the Environmental Report? See page 15 and Section 4.**

Very positive, **positive**, neutral, negative, very negative

SLE agrees with the predicted environmental effects of beavers on those species and habitats considered as having conservation importance.

Whilst recognising the benefits beavers can provide we feel the report adequately recognises and provides sufficient detail where interactions with beavers might cause conflict with other interests.

4. **Are there any other environmental effects that have not been considered?**

Other than those detailed above we feel environmental effects have been well considered.

5. **Please provide any other comments you have on the Environmental Report.**

We would like to reinforce the point we have consistently made throughout our response fundamental consideration needs to be given to the long-term funding of mitigation measures.

If appropriate funding mechanisms are not put in place to help land managers mitigate beaver damage, we would be in a situation where land managers are left to shoulder the financial burden created by (in the case of Tayside) an illegally re-introduced species that has subsequently been allowed to remain by the government.

Without funding, it is likely that those negative effects identified in the Environmental Report will become a wide-spread reality.