

Species Licensing

Enclosure of Eurasian Beaver at Cors Dyfi Nature Reserve

Draft decision : Summary of consultation responses received

Contents

Glossary of acronyms used in this document.....	3
1. The Application	4
2. NRW's draft decision.....	4
3. The Consultation	5
4. Conclusion	5
ANNEX 1: Summary of Consultation Responses	6
1) NRW responses to representations received	7
2) Consultation Responses from Organisations	11
3) Consultation Responses from Members of the Public	21

Glossary of acronyms used in this document

Acronym	Meaning
NRW	Natural Resources Wales
WG	Welsh Government
OCVO	Office of the Chief Veterinary Officer
VRA	Veterinary Risk Assessment
NE	Natural England
EM	<i>Echinococcus multilocularis</i>
WBP	Welsh Beaver Project

1. The Application

The application by the Montgomery Wildlife Trust is for the release of up to a maximum of 6 Eurasian beaver (*Castor fiber*) into a secure enclosure at Cors Dyfi Nature Reserve.

The application states that the area in which the secure enclosure will be located cannot be managed in traditional ways due to the difficult terrain on the reserve, including grazing by water buffalo which manage some less harsh areas of the reserve. The application states that the beavers would therefore perform a vital scrub management role on the site by reducing the cover of willow and birch and enhance the network of channels and open water. The management of woody vegetation and maintaining water levels are both important factors for restoring this area of lowland peat bog that is being degraded by earlier forestry management and drainage.

2. NRW's draft decision

NRW, as the authority for the determination of any species licence application, has considered the licence application submitted by the Montgomery Wildlife Trust.

Having reviewed the documents submitted NRW was minded to issue a licence. NRW considered the following in making its decision:

- the Impact on protected sites such as SSSIs, SAC's and SPA's;
- competence of the applicant and named staff on the licence;
- management of operations;
- site security;
- accidental escape from the enclosure;
- disease risk;
- monitoring.

3. The Consultation

On the 14th September 2020 NRW commenced a four-week public consultation of our draft licence and decision document. This enabled engagement with the public and provided the opportunity to participate in the decision-making process through the submission of representations on the application to release up to 6 beavers into an enclosure at the Cors Dyfi Nature Reserve. The consultation took place via a dedicated online consultation tool and was wholly focused on the draft licence and Decision Document. The consultation portal included the following documents:

- Draft Licence
- Draft Decision Document
- Method Statement
- Beaver Comms Plan
- Veterinary Risk Assessment
- Otter Survey
- Additional Otter information

The online consultation contained the following targeted questions:

- Have you read through the draft licence and draft decision document?
- Do you have any comments on the draft licence?
- Do you have any comments on the draft decision document?
- Is there any relevant information you believe we have not yet considered, which you would like to bring to our attention?

The consultation received a total of 1974 representations which have been analysed with the support of NRW technical advisors and species specialists.

4. Conclusion

NRW has requested additional information from the applicant in the form of an updated escape and re-capture plan which will include details of fence maintenance and fence monitoring and also an updated exit strategy. These have been requested as independent stand-alone documents that can be quickly and easily referenced if required. A final decision on the licence will rest with provision of satisfactory information as requested for inclusion in these documents.

ANNEX 1: Summary of Consultation Responses

The consultation of our draft decision was undertaken due to the 'high public interest' of the application. By progressing with a 'minded to Issue' public consultation, this provided the opportunity for the public to view the documents and tell us if there were any relevant issues that had not been addressed in our draft decision document and draft licence.

NRW received 18 representations from organisations / groups and a total of 1956 representations from the public, a series of which were either identical (total of 1762) or formed part of other representations. Of the 1,762 emails received 877 were a direct cut and paste of a standard response to NRW suggested by the Wildlife Trusts and 885 had additional general comments stating the positive impacts that beavers had on habitats and waterways. They did not include any comments relating to the draft licence or decision document.

All representations from individual members of the public have been grouped, summarised and addressed together. Some representations related to matters outside of the scope of the relevant legislation or part of the licence determination and this is referenced in the summary of conclusions and table below.

We also received many responses which referred to aspects associated to a wild release of beavers. NRW is in receipt of an entirely separate species licence application, reference S087504/1, which relates to a 5 year trial wild release project. That application will be subject to a separate public consultation and determination at a later date.

The NRW responses to the representations received and table below summarise the responses submitted through the online consultation portal (205) and via separate email correspondence (1769) together with how they have been considered and addressed.

NRW responses to the representations received

NRW Role / Policy in relation to Beavers in enclosures

European beaver (or Eurasian Beaver to give it its common name) is listed in Part 1B of Schedule 9 of the Wildlife and Countryside Act 1981 (as amended). Section 14(1)(b) of the Act makes it an offence to release or allow to escape in the wild any animal included on Schedule 9. The power to grant a licence is given under Section 16 with NRW named as the appropriate authority responsible for issuing licences. Prior to the establishment of NRW, Welsh Government (WG) was the appropriate authority for the issuing of licences.

The licencing of the release of beavers into an enclosure is to help ensure that any lawful release will be undertaken in an appropriately controlled and managed way. This will allow Natural Resources Wales to take in to account any benefits and risks in our licensing decision.

During the period when WG was the licensing authority, WG determined that the release of beavers into an enclosure would need to be licensed where the beavers were living in a wild situation and/or they were capable of having an impact on natural habitats, fauna or flora. This was similar to the Defra/Natural England (NE) policy approach at that time and effectively meant that only beavers released into large enclosures would need to be licensed.

NE updated this position and from 2017 all releases of beavers into enclosures now require a licence unless in a zoo or other secure artificial environment. One of the reasons for this change was the number of escapes by beavers from enclosures meaning that release into an enclosure could be equivalent to a release into the wild. Licensing this activity would give greater control over the management and fencing conditions and give the ability to enforce action if required.

In December 2018 NRW adopted a similar position whereby any release of beavers into an enclosure, except zoo conditions, would require a licence from NRW.

Legislation / Consultation Text

Comments were received regarding the wording of the consultation text in relation to the legislation.

The original wording on the web portal led to some confusion as the wording was an interpretation from statements in the 2010 Defra guidance in relation to Schedule 9 but was not an accurate representation of the current legislation in relation to beavers. The web portal was amended on the 1st October 2020 to use the wording from the Wildlife and Countryside Act and add in a more general statement about the purpose of the licencing of beavers, taken from the Welsh Government Explanatory Memorandum published when beavers were added to Schedule 9 in 2015.

The text was amended to read-

‘A licence is required as Section 14 of the Wildlife and Countryside Act 1981 prohibits the introduction into the wild of any animal of a kind which is not ordinarily resident in, and is not a regular visitor to Wales in a wild state, or any species of animal or plant listed in Schedule 9 to the Act. Eurasian Beavers are listed under Schedule 9 part 1B.

The licencing of beavers is to help ensure that any lawful release will be undertaken in an appropriately controlled and managed way, allowing Natural Resources Wales to take in to account benefits and risks posed to biodiversity, animal welfare, land/property owners and waterways in our licencing decision’.

Numbers of beavers to be released into the enclosure

Until beavers are sourced from Scotland the applicant is not able to confirm the exact numbers of beavers that will be released into the secure enclosure. The application states that “there will be either an unrelated pair of beavers or existing small family unit released into the enclosure”. Based on this information it was decided to licence “release a maximum of 6 Eurasian beaver (*Castor fiber*) into a secure enclosure at Cors Dyfi Nature Reserve.” It will be up to the Wildlife Trust to determine exactly how many beavers will be in the enclosure at any one time. If any additional beavers are to be released into the enclosure an amendment or additional licence would be required.

Beaver safety and welfare

Questions were asked in relation to the welfare of the beavers. NRW are satisfied that these concerns are covered by the documentation supplied as part of the application. It will be up to the Wildlife Trust to determine exactly how many beavers will be in the enclosure at any one time. Section 4. of the Method statement states “*This enclosure would comfortably support one pair of beavers together with their offspring from two or three breeding seasons. It is possible that kits may need to be removed from the family group at about 24 months to prevent territorial disputes, but*

this will be reviewed on an annual basis. The family will be monitored and if there is any evidence of the infighting, such as cut tails then the offspring will be removed from the enclosure. The WBP would look to place these youngsters at other beaver projects in Britain". Section 11. Management within the Method statement submitted with the application states that *"to avoid overcrowding within the enclosure, subadult beavers will be removed and rehomed by transferring to other projects."*

Disease Risk

Beavers, like all animals, can carry disease. There is a particular disease risk with the importation of beavers from Europe due to the presence of the highly pathogenic tapeworm *Echinococcus multilocularis* (EM) which has significant human health implications. Beavers are a carrier of the tapeworm and it is endemic in most of the rest of Europe. The UK has 'EM-free' status and therefore it is important that EM is not brought into the country accidentally with imported beavers. EM cannot be passed from beaver to beaver (the life cycle requires a stage in canids – foxes/dogs etc) and therefore for EM to be present in escaped/released beavers in the wild these animals would have to have been imported from Europe.

This application proposes to use animals that are either captive bred or wild born in Scotland as noted in the Method Statement under section 6, therefore effectively eliminating the risk of transmitting EM.

The applicant also provided information regarding health risks via a separate detailed Veterinary Risk Assessment (VRA) as part of the application. The VRA has been shared with the Welsh Government Office of the Chief Veterinary Officer (OCVO) and the disease risk assessments for this application have been assessed and approved by OCVO.

Escape of beavers from enclosure

Concerns were raised by consultees in relation to beavers escaping from the enclosure. An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and the notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.

Liability

A number of consultees have queried as to who would be liable should the beavers escape from their enclosure and cause damage to neighbouring property. As with any claim for damages, the question of who may be liable would be based on the

specific facts of any such occurrence. If issued, the proposed licence conditions which include the applicant ensuring that the enclosure is securely fenced; having an approved escape and recapture strategy; and having adequate resources and trained personnel to ensure the prompt recovery of any beaver that may escape should reduce the risk of any escape and subsequent damage to property occurring.

Exit Plan

Concerns were raised by consultees in relation to how the Exit plan (actions at the end of the project), would be implemented. An updated standalone Exit plan has been requested and to address the issues raised., a copy of which can be obtained on request if a licence is issued.

Enhancing the biodiversity

Many of the comments received through the consultation stated that the introduction of beavers would provide a natural and sustainable solution in the management and creation of ecosystems within the Nature Reserve and help the local surrounding environment and its biodiversity.

Location of beavers to be kept confidential

There were comments in relation to keeping the location of the beavers confidential. This is an application to release beavers into a purposely built secure enclosure within the Cors Dyfi Nature Reserve. The applicant has advertised the location prior to this consultation, therefore this is irrelevant due to the nature of this particular application.

Response Received from RSPB Cymru	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>The licence doesn't state how long it is for.</p> <p>Lack of genetic diversity in wild beavers in Scotland which will be used as the source for the captive beavers may cause problems creating a viable breeding group.</p>	<p>If issued the licence would have an end date of five years following date of issue.</p> <p>The enclosure beavers will be sourced as a breeding pair, or small family group to avoid the risk of related animals breeding.</p>
Response Received from Afonydd Cymru:	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>Request that a thorough escape and recapture plan be submitted to NRW prior to release as per point 102 in the draft licence.</p> <p>Pregnant females have a tendency to wander, please revise your requirement of weekly checks of fence integrity through Winter months (gestation period is January / February through to April / May). This area is also prone to flooding.</p> <p>2-4 kits per breeding pair should be expected. In the proposed small enclosure what happens if the six released turn into 3 breeding pairs and successfully raise 4 kits each per annum? We would like to see sensible contingency plans for this scenario.</p>	<p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p> <p>Section 11. Management within the Method statement submitted with the application states that "to avoid overcrowding within the enclosure, subadult beavers will be removed and translocated to other projects"</p>
Response Received from CADW:	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>The impact of beavers on cultural heritage has been considered in general in Beavers in Scotland Strategic Environment Assessment https://consult.gov.scot/forestry/beavers-in-scotland/user_uploads/sct09170881161-01-2.pdf</p>	<p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p>

<p>In regard to specific issues in the Dyfi catchment, it is considered that the impacts will be confined to the lower ground close to the main river and streams rather than on the uplands.</p> <p>Likely effects to scheduled and unscheduled monuments could be due to the beavers constructing dams that divert the course of a stream or river which then leads to erosion on the historic site. Damming the river could also alter the groundwater on sites, including changing pH levels. Beavers also dig burrows, which could have a direct impact on historic sites.</p>	<p>There are no streams or rivers within the enclosure and therefore beaver engineering activity will not result in retained water/changes.</p> <p>There are no scheduled or unscheduled monuments in or near the enclosure. Any comments related to the presence of established beaver populations in the wild are not relevant to this particular application</p>
<p>Response Received from The New Dovey Fishery Association (1929) Limited:</p>	
<p>Summary of issues raised:</p>	<p>Summary of consideration / how this has been covered</p>
<p>A petition with signatures was received objecting to the proposed introduction of beavers onto their land.</p> <p>Concerns raised through a separate letter related to:</p> <p>Risk of beavers escaping from the enclosure;</p> <p>Impacts that a wild release would have in the area.</p>	<p>This licence application is to release beavers into an enclosure on land owned and managed by the Wildlife Trust</p> <p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p> <p>Any comments received in relation to a wild release are not relevant to this particular application.</p>

Response Received from Prince Albert Angling Society (PAAS) :	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>Concerns raised regarding the breeding of beavers in the enclosure and the enclosure becoming overpopulated.</p> <p>Concern that overpopulation in the enclosure may be resolved by releasing some of the animals into the wild</p> <p>All other comments related to impacts that a wild release would have in the area.</p>	<p>Section 11. Management within the Method statement submitted with the application states that “to avoid overcrowding within the enclosure, subadult beavers will be removed and translocated to other projects”</p> <p>Release of beavers from the enclosure into the wild would be an offence without a licence to do so.</p> <p>Any comments received in relation to a wild release are not relevant to this particular application.</p>
Response Received from NFU Cymru:	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>Concerns raised regarding the re-introduction of beavers in general within the Dyfi area.</p> <p>Land managers and stakeholders must be consulted before any release</p> <p>Statement in relation to the legal status of beavers in Wales and how this must not be changed during the project</p> <p>Famers and landowners directly surrounding the enclosed application have concerns regarding:</p> <ul style="list-style-type: none"> • disease risk • how the project may impact on their own land management; • fence design and whether any damage to fencing could be remedied in 24 hours and allocated resources for repairs; • risk of beaver escape; • resource for length of project; • governance structures or where responsibilities lie; • surveillance and monitoring along with access onto surrounding land 	<p>Any comments received in relation to a wild release are not relevant to this particular application.</p> <p>See section above: Legislation / Consultation Text and NRW Role / Policy in relation to beavers in enclosures</p> <p>See section above: Disease Risk</p> <p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p>

Concerns about where liability for enclosed beavers lies	See section above: Liability
Comments made in relation to the numbers of beavers released	See section above: Numbers of beavers to be released into the enclosure
Clear communication from the Wildlife Trust about future species management and exit strategies	An updated standalone Exit plan, action at the end of the project, has been requested and will address issues raised, a copy of which can be obtained on request if a licence is issued.
Response Received from Parneriaeth Pennal:	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>NRW received two separate emails from Partneriaeth Pennal. One had a list of concerns from farming families / landowners on/near the Dyfi and the other listed concerns brought up at a meeting of the Steering Group of the environmental landscape catchment scheme Pennal 2050. Both noted the following concerns:</p> <p>lack of consultation with landowners by the applicant. public access around the enclosure</p> <p>disease risk</p> <p>escape of beavers from enclosure</p>	<p>Not relevant to NRW's licence determination decision</p> <p>See section above: Disease Risk</p> <p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p>

impact of wild release of beavers	Any comments received in relation to a wild release are not relevant to this particular application.
Response Received from Wildlife Trust Wales:	
Summary of issues raised:	Summary of consideration / how this has been covered
Concerns raised in relation to NRW's decision to undertake a consultation of our draft decision	<p>Our approach to consultations for High Public Interest applications is detailed in our Public Participation Statement:</p> <p>https://naturalresources.wales/permits-and-permissions/permit-applications-consultations-and-decisions/public-participation-when-and-how-we-consult-on-environmental-permits/?lang=en</p> <p>Additionally, customers who are dissatisfied with our actions, lack of any actions, or the standard or service provided by us can be addressed through our Complaints and Commendations Policy;</p> <p>https://naturalresources.wales/about-us/contact-us/complaints-and-compliments/complaints-and-commendations-policy/?lang=en</p>
Response Received from BASC:	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>Concerns regarding what happens if the site gets flooded and beavers can escape, and action to be taken if beavers repeatedly escape. Is the recapture plan robust enough?</p> <p>What effects will it have on the Ramsar, SSSI and SPA sites and has this been reviewed by an external verifier?</p>	<p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p> <p>NRW has completed a Habitats Regulation Assessment for this application in addition to considering the impacts on SSSIs. The</p>

<p>What will actually happen at the end of the 5 years will they get released into the Dyfi area?</p> <p>What is the goal of the project?</p>	<p>enclosure is not within any protected site although it is in proximity to the Dyfi SSSI, Aber Dyfi SPA and Pen Llyn a'r Sarnau SAC. On receipt of the updated escape, recapture and fence maintenance plan and updated exit plan we will update the HRA. A licence will only be issued if it can be demonstrated there will be no adverse impact on the SAC and SPA. There are no plans for an external verifier to review the HRA.</p> <p>Clarification has been requested within the new standalone exit plan. Release of beavers from the enclosure into the wild would be an offence without a licence to do so.</p> <p>The purpose of the project is set out in the licence application and the Wildlife Trust has stated it is for scrub management on the site.</p>
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Response Received from Network Rail:

Summary of issues raised:	Summary of consideration / how this has been covered
<p>Why is the enclosure not going to be subject to daily checks throughout the year?</p> <p>There is no Condition in the licence clearly stating the requirement of an 'escape and recapture strategy' but this is stated in Section 3.7 of the draft decision document.</p> <p>The method statement does not include implications of damage to neighbouring infrastructure, or increased drainage issues on neighbouring land for instance In other beaver projects where there are enclosures, those areas have attracted illegal release of beavers into the wider landscape.</p>	<p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p>

Why is the licence being granted for 6 beavers when it is detailed in the application that the enclosure cannot hold that many beavers?

Condition 107 of the licence states that the 'offspring must not be removed'. As the licence application is for a 5 year period, why has NRW not required the long-term plan to be finalised from the outset, rather than allowing for loose rationale in the Method Statement stating 'WBP would look to place these youngsters at other Beaver projects in Britain.'

Condition 113 requires an 'exit strategy' to be produced. There is one provided in the method statement which states that one option is for beavers to be 'neutered or returned to the enclosure to live out their lifespan in captivity'. If the exit strategy is imposed, why would beavers be allowed to live out their lives in the enclosure? If the licence is no longer applicable then there would be no guarantee that the Wildlife Trust or the WBP maintain the enclosure and therefore are responsible for those beavers.

Condition 105 states that the beavers 'must be sourced from the wild caught in Scotland'. Why has this stipulated to be from Scotland?

There is no assessment provided by a hydrologist / drainage engineer to assess the impact of the enclosure on the surrounding hydrology / or infrastructure, including drainage.

The licence if granted is to allow the release of up to 6 beavers into the enclosure. This is to allow potential to release a family group, a pair with young. See section above: Numbers of beavers to be released and Section 11. Management within the Method statement submitted with the application states that "to avoid overcrowding within the enclosure, subadult beavers will be removed and translocated to other projects"

An updated standalone Exit plan, action at the end of the project, has been requested and will address issues raised, a copy of which can be obtained on request if a licence is issued.

Even if neutered the beavers would have to be licenced until no longer present at the site, meaning conditions to safeguard against escape would still be in place.

See section above: Disease Risk

Given the existing wetland habitats on the site, size of the enclosure and lack of watercourses within it NRW do not consider that there would be significant changes to hydrology which would be detrimental to adjacent protected sites. In relation to severe flood events the applicant has been instructed to incorporate contingency measures into the updated stand alone

<p>Fence overhangs are to be removed in three areas of the enclosure fence-line where apparently beavers will not climb. In the 'supplementary otter info' an example is given where this has been successful, however that fence-line was supported by a hot wire. We would request that a solution such as that used by the Forest of Dean is used instead rather than the overhang removed, due to their being potential for Beaver to escape where the overhang is removed.</p>	<p>escape, recapture and fence maintenance plan to deal with such events. The plan will also incorporate measures to ensure permeability of the fence will be maintained.</p> <p>The hot wire would prevent otter passage so would not be appropriate. The example referred to in supplementary info was not one where the overhang had been removed to facilitate otter movement. It was given as an example of an enclosure which otters were known to use.</p>
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Response Received from FUW Montgomeryshire:

Summary of issues raised:	Summary of consideration / how this has been covered
<p>There is insufficient evidence to conclude that this animal does not pose a threat to livestock i.e. diseases.</p> <p>This animal dams watercourses and in the surrounding area of the proposed enclosure there is agricultural land. How can you as an organisation alleviate concerns of those farming nearby that this animal's normal behaviour will not affect their agricultural productivity?</p> <p>The low lying levels of the Dyfi are already prone to flooding through natural means - does introducing an extinct animal which dams watercourses by instinct not exacerbate the flooding propensity for this area?</p> <p>What plans are in place should one or more of these animals escape?</p>	<p>See section above: Disease Risk</p> <p>Any comments received in relation to a wild release are not relevant to this particular application.</p> <p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the</p>

	frequency of fence checking be reviewed as part of the revised plan.
Response Received from Salmon and Trout Conservation:	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>We would expect NRW to complete a physical inspection of the completed enclosure and issue a report on its suitability and structural integrity. No release into the enclosure should be permitted until NRW inspectors have witnessed and are satisfied that the enclosure is resilient to attempts at escape or incursion.</p> <p>With specific reference to Item 108 NRW should be notified without delay of any damage to the enclosure fencing. The report should include photographs and a written account of the cause of the damage.</p> <p>Any dams or obstructions do not threaten the enclosure or create an opportunity for beavers to escape</p> <p>The enclosure will be protected from incursions or damage by the water buffalo roaming elsewhere on the reserve.</p> <p>We would expect the licensee to immediately inform NRW by telephone of any suspicion or discovery of escape and that this be confirmed by email as condition 101 directs. There should be no permissible delay in alerting NRW to a possible escape.</p> <p>Any dams or obstructions created by the beavers within the enclosure do not impede or block the free passage of any species of fish or cause them any other hindrance or threat.</p>	<p>NRW have requested an independent beaver expert inspect the fence per condition 108 and an updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p> <p>Condition 101 requires the applicant to notify NRW within 24 hours of any escape. This is the most appropriate way of contacting NRW especially as offices are not manned during the Covid pandemic. An email also provides an audit trail if required for future reference.</p> <p>No impact was assumed as there are no drainage channels into or out of the enclosure and therefore beaver engineering activity will not result or pose a threat to fish passage.</p>

Response Received from Llanrwst Anglers Club :	
Summary of issues raised:	Summary of consideration / how this has been covered
<p>It would be reckless to introduce any beavers into Welsh rivers that are used by migratory salmonids until there has been sufficient study in areas of the UK where both already exist (for example - Otter, Tay etc).</p> <p>Where licensed, enclosed beaver areas have appeared, illegally released beavers have been shown to appear in a very short time thereafter.</p> <p>Given the public pressure that could be exerted on the organisation, should the need for an exit strategy to be implemented, we feel that once established they would be virtually impossible to remove, and any potential impacts to migratory salmonids will just be accepted, despite their already-perilous population abundance in Wales.</p>	<p>Any comments received in relation to a wild release are not relevant to this particular application.</p> <p>An updated standalone Exit plan, action at the end of the project, has been requested and will address issues raised, a copy of which can be obtained on request if a licence is issued. NRW have also requested an updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan</p> <p>Clarification has been requested within the new standalone exit plan, action at the end of the project. Release of beavers from the enclosure into the wild would be an offence without a licence to do so.</p>
Response Received from Campaign for the Protection of Welsh fisheries	
Summary of issues raised:	Summary of consideration / how this has been covered
Concerns raised regarding the impact of beavers on fisheries in Welsh rivers	Any comments received in relation to a wild release are not relevant to this particular application.

<p>We are well aware of the aims and objectives of Trusts in general, and support their aims and objectives. However to locate beavers, albeit in a "compound", adjacent one of Wales's premiere migratory fisheries would seem to me to be irrational, to say the least.</p>	<p>An updated standalone Exit plan, action at the end of the project, has been requested and will address issues raised, a copy of which can be obtained on request if a licence is issued. NRW have also requested an updated and standalone escape, recapture and fence maintenance plan from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan</p>
<p>Response Received from Rewilding Europe:</p>	
<p>Summary of issues raised:</p>	<p>Summary of consideration / how this has been covered</p>
<p>After a period of 5 years, and assuming there have been no particular issues, the enclosure should be taken down and the beavers released into the general environment. Beavers are part of the ecology and fauna of Wales but extirpated by humans in recent times. It is time they are returned to the Welsh landscape.</p>	<p>No comments received in relation to the determination of the licence or the decision document.</p> <p>A licence would be required to release the beavers into the wild and would be subject to its own assessment</p>
<p>Response Received from the general public:</p>	
<p>Summary of issues raised:</p>	<p>Summary of consideration / how this has been covered</p>
<p>The fenced enclosure will be attacked by those intent on an illegal release from the enclosure into the wild. You arguably say they would be recaptured but I suggest that is easier said than done.</p>	<p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p>
<p>In the event of an escapee not being able to be returned to the enclosure, could another beaver be added to keep the numbers at 6</p>	<p>See section above: Numbers of beavers to be released.</p>

<p>adults? Could this also happen in case of death of one or more of the beavers, so the numbers don't drop below six? As drop in the numbers could undermine the project.</p>	<p>Comments are not relevant to the licence determination decision. It will be up to the Wildlife Trust to determine exactly how many beavers will be in the enclosure at any one time.</p>
<p>The stipulation in condition 107 is hugely limiting to the success of any long term beaver reintroduction into the UK. Removing any future possibility to increase the potential breeding population of beavers, as well as limiting any other UK beaver reintroduction projects is an overly authoritative requirement.</p>	<p>A separate licence could be required to move beavers to other projects.</p>
<p>The reintroduction of a keystone species such as the European Beaver is an important conservation step. As they are being released into an enclosure why was it necessary to consult?</p>	<p>Our approach to consultations for High Public Interest applications is detailed in our Public Participation Statement:</p> <p>https://naturalresources.wales/permits-and-permissions/permit-applications-consultations-and-decisions/public-participation-when-and-how-we-consult-on-environmental-permits/?lang=en</p>
<p>Why does this reintroduction require a license when the beavers are not being released into 'the wild'? They are only being released into a captive enclosure, which is different.</p>	<p>See section above: NRW Role / Policy in relation to Beavers in enclosures</p>
<p>I was deeply concerned when I read the following on the webpage linking the consultation:</p> <p>"Eurasian Beavers are listed under Schedule 9 part 1B, animals no longer normally present, but which continue to pose a conservation threat to native biodiversity and habitats, such that further releases should be regulated."</p> <p>I felt this an appalling thing to be stated by Natural Resources Wales...NRW should surely be acting to safeguard Wale's natural heritage</p>	<p>See section above: Legislation / Consultation Text</p>
<p>No mention in the licence to the ancient peat bog, rare wild flowers, scrub land etc. Over the winter months the boundary will only be walked once a week. Concerns</p>	<p>An updated and standalone escape, recapture and fence maintenance plan has been requested from the applicants. This will bring together all relevant information from each of the documents submitted and</p>

<p>regarding beaver escapes how much damage can be done .</p>	<p>will provide additional detail on issues such as identification of those responsible for each action, contingency measures, equipment to be used for recapture and notification process in the event of an escape. NRW has also asked that the frequency of fence checking be reviewed as part of the revised plan.</p> <p>When assessing the impact on surrounding protected sites including peat bogs we have had to assume the beavers will be confined to the enclosure on Cors Dyfi as stated in the application. Risk of escape and success of recapture will be determined by the updated and standalone escape, recapture and fence maintenance plan. We have taken your comments into account and requested this plan is revised.</p>
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Identical Response Received:

<p>Summary of issues raised</p>	<p>Summary of consideration / how this has been covered</p>
<p>Dear consultation team,</p> <p>I am very happy to hear that Natural Resources Wales is minded to issue a licence for the release of beavers into an enclosure at Cors Dyfi Nature Reserve. I write in support of Montgomeryshire Wildlife Trust's proposals, and NRW's decision.</p> <p>The Eurasian beaver (<i>Castor fiber</i>) is a keystone species and an ecosystem engineer. They play a vital role in enriching biodiversity, restoring and managing wetland ecosystems, improving water quality and controlling water flow. Their natural ability to manage wetland ecosystems offers an effective, sustainable solution for the long-term management of Cors Dyfi Nature Reserve.</p> <p>The beavers will be released into a secure enclosure within Cors Dyfi Nature Reserve. These animals will, therefore, be safely contained and will not have any impact on the surrounding landscape. The beavers will also be closely monitored and visitors to the reserve will also be able to see the work that beavers can do. This provides an important educational opportunity for people to find out more about beavers.</p>	<p>1762 similar responses were received in support of the application.</p> <p>877 were a direct cut and paste as noted adjacently and 885 had additional general comments stating the positive impacts that beavers had on habitats and waterways.</p> <p>The comments provided in these emails raised no relevant issues regarding the determination of the licence or the decision document therefore are out of the scope of this consultation</p>

<p>Thank you. I hope you will consider my views in the consultation. I will look forward to hearing more about this project as it progresses.</p>	
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