

ER Addendum

1. Do you have any information to add to the ER Addendum?

We note that the ER addendum includes a high level summary of the impacts and significance of effects from the 2017 ER. In the case of fish and fisheries, and freshwater pearl mussel, we consider that the range and balance of effects, 2017 conclusion and assessment of likely significant effects still stand. However, whilst the 2017 ER concluded that the majority of the adverse effects identified can be satisfactorily and straight forwardly mitigated to avoid significant effects, we do not believe that this is the case with regard to fish and fisheries without the associated monitoring and mitigation work being funded by the public purse. We also note that the Natural England review referenced in the Addendum points out that “those benefitting from beaver activity (largely from water management) may not be the same as those who bear the costs”. We strongly agree with this conclusion and more thought needs to be given as to how those benefitting from beavers (as an example, ecotourism is identified in the ER addendum) should contribute to ongoing management and mitigation of impacts.

2. Do you agree that the ER Addendum provides an accurate assessment of the current position with regard to Beavers in Scotland?

There are several occasions when the ER addendum discusses impacts on fisheries, without also considering the impact on Atlantic salmon conservation. Impacts of beaver dams on fish accessing important spawning grounds could be highly relevant to the conservation of salmon in addition to impacting the fishery. The Scottish Government recognises that wild salmon are in crisis and have published a Wild Salmon Strategy. We recognise that salmon are impacted by a range of pressures, and that in some cases beaver activities could be beneficial. However, in the case of access to habitat, the priority for managers and Scottish Government is to ensure free access to as much suitable habitat as possible. In our view, the potential impacts on migratory fish, and the resourcing of management and mitigation action, must have a higher profile in the document, due to the continuing declines in Atlantic salmon across the North Atlantic, and renewed importance of ensuring free access to habitat.

The Scottish River Temperature Monitoring Network has identified that many of Scotland’s rivers are at a particularly high risk of increasing river temperatures resulting from climate change. Targeted tree planting is presently the only viable option for mitigation of rising water temperatures, and many FMS members are putting considerable resources into increasing riparian tree cover at catchment scales. Management measures available to protect existing trees in strategic locations from beaver interactions may be difficult or expensive to implement, particularly at scale. Potential additional costs associated with modified fencing for new plantations or retrofitting at existing plantations should be taken into account when considering potential introductions of beavers.

3. Does the national spatial analysis provide useful information for informing the suitability of beaver translocations in new catchments?

We have some concerns with the analysis as set out on the document. With regard to salmon rivers, the analysis considers the overlap of river sections where salmon are present and of downstream effects based on Beaver Dam Capacity classes. However, experience from Tayside has demonstrated the significant impact that very small dams can have if associated with human infrastructure, such as

fish passes and culverts. The impact on migratory fish, or the scale of mitigation required, will be strongly influenced by the presence, location and extent of spawning habitat upstream of such infrastructure. This was identified as a key information gap by the beaver-salmonid working group, and was raised again during the development of the Scottish Beaver Strategy - it is therefore very disappointing that this important consideration is missing from the spatial analysis. We note that for larger catchments (we would argue all catchments), the ER Addendum states that “these catchments may need extra consideration with regard to monitoring the effects of beaver dams on migratory fish and associated interests (fresh water pearl mussels and otters). More detailed interpretation of beaver dam capacity within catchments may highlight where particular concerns are likely to arise if beaver dams did present a barrier to movement or alter the river morphology to the detriment of such interests.” We think that the above point, needs a far greater profile in the document, taken together with our concerns expressed in our answer to question 2.

River Leven (Loch Lomond) and River Forth catchments ER

4. Does the River Leven (Loch Lomond) and River Forth ER address the key environmental effects that are likely to arise from beaver presence – is there anything missing from the ER?

See our comments above relating to a detailed analysis of human infrastructure and the potential for dams in these locations to have an impact on migratory fish. As set out above such impacts, or the scale of mitigation required, will be strongly influenced by the presence, location and extent of spawning habitat upstream of such infrastructure.

5. Are there benefits likely to arise from beaver presence that have not been included?

See our answers to the ER addendum above

6. Are there negative effects likely to arise from beaver presence that have not been included?

See our answers to the ER addendum above

7. Do you have any specific comments to make with regard to effects or the management of effects on: biodiversity interest, water quality resource and ecological status, population and human health, cultural heritage, material assets, infrastructure

See our answers to the ER addendum above

8. Do you agree with the assessment of the likelihood and significance of the effects identified? If no please provide a reasoning.

With regard to fish and freshwater pearl mussels, the document appears to identify the main issues, without concluding whether the effects will be positive or negative. This demonstrates the current paucity of information associated with these potential impacts. The 2017 ER concluded that the majority of the adverse effects identified can be satisfactorily and straight forwardly mitigated to avoid significant effects. We do not believe that this is the case with regard to fish and fisheries

without the associated monitoring and mitigation work being funded by the public purse. The Scottish Government recognises that wild salmon are in crisis and have produced a Wild Salmon Strategy. We recognise that salmon are impacted by a range of pressures, and that in some cases beaver activities can be beneficial. However, in the case of access to habitat, the priority for managers and Scottish Government is to ensure free access to as much suitable habitat as possible and therefore this aspect needs detailed consideration.

9. Does the proposed mitigation and monitoring provide assurance that negative impacts can be adequately addressed?

No. There are not currently adequate resources to undertake adequate monitoring and mitigation work to address any negative impacts arising from beaver translocations. This crucial issue has been raised continuously with NatureScot and Scottish Government and needs to be urgently addressed.