
10 October 2024

Dear Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Huw,

Afonydd Cymru read with interest your recent statement supporting the managed re-introduction of European beavers in Wales.

The Rivers Trusts in Wales supports, in principle, the re-introduction of beavers to Welsh rivers. However, we believe that this requires a strategic approach to ensure that the benefits are maximised, that issues arising from their re-introduction are minimised and that the necessary actions can be taken should problems arise.

A key issue for Afonydd Cymru is the safeguarding of our internationally protected salmon and sea trout populations. As you know, there has been a dramatic decline in the numbers of these iconic species and since 2021 Natural Resources Wales have declared them at risk of extinction for all rivers in Wales. We believe that a threatened species already designated in Wales must be protected and we need to ensure that no changes, whether this be by re-introduction of any species or by conflicting requirements of protected species, occurs. The Habitats Regulations require that a precautionary approach is applied, and we do not believe that, at present, sufficient research has been carried out to understand fully the potential impact of the reintroduction of beavers on migratory salmonids in Wales. For the same reason, we do not feel beavers should be given protected species status until we are clear on these evidence requirements and have a better understanding of any other issues beaver reintroductions might cause in Wales.

Afonydd Cymru would like to see a National Management Framework for reintroducing beavers in Wales, in addition to the current licence application process. Planning and implementing this framework should be the responsibility of a national statutory body which is adequately resourced and prepared to balance the needs of beavers with those of other species and, importantly, all relevant stakeholders. The framework would determine where and how many beavers should be reintroduced, identifying locations where they would thrive with minimal negative impact and avoiding areas such as salmon spawning areas (and the access to them), man-made lakes, flood defence embankments and areas vulnerable to flooding. The framework could also explore the benefits from beaver re-introduction and where they could have the most benefit for the delivery of measures such as natural flood management. The framework must consider our cross-border rivers and how a national framework in Wales may differ to the approach in England.

email: admin@afonyddcymru.org www.afonyddcymru.org

There is a particular and understandable concern among farmers, landowners and river owners regarding adverse impacts which may arise from beaver re-introduction and who would be responsible for dealing with these. Even with a management framework, it is inevitable that beavers will spread from designated areas into other locations and that there will be unforeseen impacts. We would therefore expect any framework to consider liabilities and who will be responsible for any adverse impacts that arise. Evidence from European countries clearly demonstrates that damage caused by beavers can be very considerable.

As with any licensed activity in Wales, we would expect regulation and enforcement to be in place. We therefore support a properly resourced regulatory body with the necessary powers to enforce the framework in Wales. The funding for this resource should be secured through the National Charging Scheme and licence charges should reflect both the framework processes, the regulation and enforcement and the determined future insurance costs. We are concerned that up to now there has been a total absence of any enforcement action by NRW in relation to illegal releases of beavers in Wales.

We hope that you find this helpful, as part of your consultation and consideration for the re-introduction of beavers.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gail Davies-Walsh', written in a cursive style.

Gail Davies-Walsh, CEO