

Response to DEFRA consultation – Control of the European beaver (*Castor fiber*)

1. Proposal to add the European beaver to Schedule 9 of the WCA

- a. We support this proposal.

2. Impact assessment

- a. Costs of adding beaver to Schedule 9 = zero. This seems reasonable.
- b. Benefits. This section could be improved considerably by writing with greater clarity in terms of:
 - i. Economic costs that would be avoided by prevention of unlicensed release into the wild
 1. The authors acknowledge the complexity of predicting avoided costs. Yet there is considerable detail attempting to assess the economic benefits in terms of avoided costs. This is all VERY speculative.
 2. Not quantifying the monetary cost may be better than an unsafe estimate?
 - ii. Avoided ecological costs
 - iii. Avoided costs (economic, health and welfare) to human health
 - iv. Consistent with IUCN Guidelines.
- c. The document should make the point that the legislation will not guarantee inappropriate releases. It merely makes them illegal.

3. Voluntary code of practice

- a. A “code of practice” should give clear, simple to follow, guidance to keepers/importers as to **exactly** what is required in order to comply both with the law and with the code when intending to import a beaver from Europe.
- b. This is currently not the case. The specific requirements are lost within a significant amount of background (albeit relevant) information, making it hard for the reader to determine exactly what both the code and the law require.
- c. On the plus side the current document addresses the following:
 - i. the relevant issue of enclosure security with respect to access by free-living carnivores or domestic dogs
 - ii. the relevant issue of sourcing in the context of EM, and that the range of EM is changing
 - iii. the legal requirements for importation.
- d. However, the document currently fails to set out in a ‘simple to follow’ manner what is required to comply with the law and a code
- e. Issues that are not addressed at all include:
 - i. If the intended enclosure is deemed to be “in the wild” (Natural England decision), then Section 14 of the WCA applies and a licence under Section 16 of the WCA is required.
 - ii. How to deal with the changing distribution of EM in Europe.
- f. We also consider it irresponsible not to include the following as requirements of a voluntary code:
 - i. Identification by microchip to assure traceability
 - ii. Registration (including microchip ID) of all imported individuals, with full public access to such a register
 - iii. Health surveillance for infections other than EM e.g. *Francisella tularensis* and hantavirus.
- g. We therefore suggest the following to improve the document:
 - i. **Introduction** to include:

1. The law relating to importation, making it clear that the location, size, design and security of the enclosure in which it is intended to keep a beaver will determine if Section 14 of the WCA applies or not and thus whether a licence is required
 2. Outline EM, the role of beavers as intermediate hosts, the disease in humans, current and changing distribution in Europe
 3. Acknowledgement that there are risks of importation such as other diseases, escape etc.
 4. Summary as to why a voluntary code is required.
- ii. Section on legal requirements for importation into captivity
1. i.e. **"How to comply with the law"**
 - a. Make sure this is easy for lay persons to understand
 - i. Currently the section "Legal position" would be very unhelpful and confusing to anyone wishing to ensure compliance with the law.
 - b. Highlight the necessity for an enclosure to be not "in the wild" OR WCA applies.
- iii. Section on voluntary code requirements i.e. **"How to comply with the Code"** including:
1. Sourcing (with reference to how to deal with the changing distribution of EM)
 2. Enclosure design relating to whether or not access by other free-living carnivores and/or domestic dogs is possible, and how this affects the sourcing requirements
 3. Identification by microchip and registration
 4. Health surveillance measures e.g. as outlined in Goodman *et al.* 2012.

Reference

Goodman, G., Girling, S., Pizzi, R., Meredith, A., Rosell, F. and Campbell-Palmer, R. (2012) Establishment of a health surveillance program for reintroduction of the Eurasian Beaver (*Castor fiber*) into Scotland. *Journal of Wildlife Diseases* **48**, 971-978.