



(6th /7th July 2016)

Paper Title:	Position Statement Conservation Translocations
Paper Reference:	NRW B B 44.16
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Purpose of Paper:	Decision – We need to develop a clear position on conservation translocations and the principles we will apply.
Recommendation:	The Board is asked to approve the Position Statement on conservation translocations. If approved, the operational guidance note will be finalised and published with the position statement.

Impact: To note – all headings might not be applicable to the topic	<p>How do the proposals in this paper help NRW achieve the Well-Being of Future Generations Act principles in terms of:</p> <p>Looking at the <u>long term</u>: Conservation translocations may be the only way to promote resilience in a population with subsequent benefit for biodiversity objectives by improving ecological resilience, but all alternative measures must be explored first. Conservation translocation projects are in themselves long term commitments and if successful the benefits, or consequences, are long lasting and can be wider than conservation of species as this work can build resilience of populations which can drive wider benefits for Wales.</p> <p>Taking an <u>integrated</u> approach: The Policy Position sets out how we will take advice from across the organisation and elsewhere to form decisions across all of our functions which can help to support wider benefits and avoid further challenges.</p>
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	<p>Involving a <u>diversity</u> of the population: Proposals may benefit from wider collaboration and although assessed on a case by case basis against established clear guidelines and criteria, a wider understanding across sectors of the challenges and benefits can be helpful. The community and neighbours must be consulted at a scale appropriate to the translocation as part of any proposal, additional benefits can be realised and concerns mitigated where appropriate.</p> <p>Working in a <u>collaborative way:</u> By providing a clear understanding of where the bar is set for the assessment of proposals applicants can more easily determine viability. Our roles involve working with or advising stakeholders on their proposals with clear points of contact to a consistent standard and process.</p> <p><u>Preventing</u> issues from occurring: By following internationally established guidelines and criteria we will avoid inappropriate and costly translocations where alternative measures could suffice. Clarity over what is expected and a clear understanding of our decision making process will prevent any commitment before full assessment.</p>
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Issue

1. Conservation translocations are the deliberate movement by humans of living organisms from one area, with release in another. The primary objective is conservation benefit by restoring a population in a species’ indigenous range or intentional introduction outside of a species’ indigenous range to improve ecological resilience. The facilitation of direct economic benefit or translocations for the purposes of academic interest are not regarded as being for the purpose of ecological resilience and therefore do not meet the definition of conservation translocations. We need to communicate our position in regard to conservation translocations in four main roles - as a regulator, land manager, adviser and our potential involvement in direct project delivery. Staff, stakeholders and the public need to understand the guiding principles we will apply and how we will consider partnership or project proposals and permit applications. Annex 1 identifies recent work delivered on conservation translocations.

Background

2. We have a statutory obligation to consider licence applications in relation to translocations (for example, taking or being in possession of certain animals) under the Wildlife and Countryside Act 1981(amended 1985) and with regard to European Protected Species (EPS) under the Conservation of habitats and species regulations 2010. The EC Habitats Directive gives NRW a duty to maintain or restore European Habitats and Species to favourable conservation status and The Birds Directive requires NRW to prevent the deterioration of bird populations listed on Annex 4(4). The Environment (Wales) Act 2016 requires NRW to maintain and enhance biodiversity in

all of our activities and in doing so promote the resilience of ecosystems; this includes our management of land (Welsh Government Woodland Estate, National Nature Reserves and other assets), provision of advice and applying the principles of the Sustainable Management of Natural Resources (SMNR) in the exercise of our functions. Our decisions must be based on sound analysis of each proposal reflecting the SMNR purpose and principles and other relevant legislation and policy.

3. The principles for our Position Statement follow internationally recognised guidance written by the International Union for Conservation of Nature (IUCN) and are compatible with delivery of Welsh Government (WG) policy and our corporate objectives. This guidance is used across England and Scotland also. We will apply these principles to all relevant permit applications and project proposals, including those that we deliver ourselves, either in partnership or as sole delivery agent. Considerations for continuing investment should ensure that projects and programmes have been assessed using these principles.
4. The Position Statement, at Annex 2, brings together the guiding principles and the policy context and will be supported by an Operational Guidance Note (OGN), in draft at annex 3, which directs staff on the decision making process for considering Conservation Translocation proposals. We will apply the SMNR principles, considering evidence, taking account of short, medium and long term consequences of the decision and as appropriate engaging with stakeholders. We have a reasonable expectation that promoting our position statement will reduce advisory transactions because prospective applicants will have clarity on what is required.

Assessment

5. Conservation translocations by definition provide benefits to the population of species being translocated or to the ecosystems into which the translocation is made, improving biodiversity and the resilience of ecosystems which biodiversity underpins. They also have the potential to provide positive well-being benefits by supporting the sustainable management of our natural resources and direct benefits such as eco-tourism. However there are risks in translocation scheme implementation and these need to be assessed and where necessary mitigated against. The IUCN Guidelines emphasise the need to consider alternatives to translocation due to the costs and risks involved:

‘Many conservation translocations will yield conservation benefit only at high financial cost and with considerable risks. Therefore, irrespective of any conservation priority assigned to the species, any proposed translocation should be justified through comparison with alternative solutions.’

6. The IUCN Guidelines are independent, have been widely peer reviewed, and are used as guidance on Conservation Translocations in many countries. They set out the issues for consideration when determining whether to carry out a translocation and describe the steps for planning and implementing a translocation project. This includes assessing and mitigating risks, liaising with stakeholders, provision of monitoring and an exit plan.

7. Alternatives to translocation should be evaluated in determining whether to use translocation; these include the preference to prioritise further habitat restoration which builds resilience through for example increased connectivity, or condition improvement to encourage natural colonisation, removal of pressures such as invasive non-native species. Where suitable conditions exist and reintroduction or reinforcement is required to establish a viable population or if a species will provide an ecosystem function, conservation translocations can be considered.
8. Scotland has established a National Species Reintroduction Forum of 29 organisations which has drawn up a Code for Conservation Translocations to interpret and implement the IUCN guidelines. The National Species Reintroduction Forum contributes to broad scale, strategic issues relating to species reintroductions including the decision making process for any new national reintroduction projects.
9. Nature England does not have a similar code and process but receives a number of proposals for reintroductions. They have stated that any reintroductions will be considered in line with prevailing legislation and international guidelines. We recognise that there is need to consider certain reintroductions in terms of impact across the whole of the UK.
10. Whilst it may be desirable to apply a simple rule such as a blanket 'we will not permit' approach to all potential translocations, the variability in proposals, their risks and benefits dictate that each proposal must be assessed on its own merit.
11. We will use the IUCN Guidelines as the basis for assessing proposals in our four roles:
 - a) **Regulator:** Translocations involving wild animals or plants listed in Schedules of the Wildlife and Countryside act 1981 (as amended) giving them certain protections; Schedule 1 (birds which are protected), 5 (animals which are protected), 6 (animals which may not be killed or taken by certain methods), and 8 (plants which are protected) will require a licence from us for certain activities. Section 14 of the act addresses the introduction of species not normally resident or those listed on Schedule 9 (animals and plants established in the wild) this also requires a licence from us. The Conservation of Habitats and Species Regulations 2010 give us a duty to consider licence applications regarding EPS. We have a duty to assess applications with accordance to our statutory obligations.
 - b) **Land Manager:** Where a project is proposed on land managed by us we should apply the principals of SMNR and consider any implications for how the proposal may impact on our management and delivery of corporate objectives and WG policy. This will include assessment of financial impact.
 - c) **Adviser:** We are consulted by other parties in the early stages of project development; a welcome step. We need to ensure that we give consistent advice to stakeholders and therefore the appointment of a lead officer for any project is important to ensure one message to interested parties. There does need to be a clear separation of roles if the project also requires a licence from us.
 - d) **Project delivery:** We may decide that we should take part in delivering a conservation translocation, either in partnership or as sole agent. There is no legal

imperative to undertake conservation translocations, rather they are an option available to promote biodiversity and ecological resilience. The same process of developing a project according to the IUCN Guidelines should take place. This will help determine if translocation is the most appropriate method of reaching the objective. The proposal will be assessed using the same criteria for our own projects as for any proposal.

12. In considering proposals we will assess the impact on International and European commitments as well as domestic priorities.
13. We recognise the potential for some translocations to impact across the UK and will establish a mechanism to liaise with the other Statutory Nature Conservation Bodies in the UK on reintroductions.

Recommendation

14. To approve the Position Statement on conservation translocations at Annex 2. The Operational Guidance Note (draft) at Annex 3 will provide full details for staff considering external proposals and internal business cases for conservation translocations with templates to provide an audit trail for each case.

Key Risks

15. The Position Statement provides stakeholders and staff with clarity on our assessment of applications or proposals for the translocation of species in Wales. This ensures a clear, fair process in line with good practice and current government policy. Without a clear position we will not have a robust and consistent process to manage proposals and permit applications, media and political interest.

Financial Implications

16. The Position Statement and Operational Guidance Note set a consistent framework for proposals internally and externally. The process ensures a single point of contact for the proposer or applicant. Costs are mainly due to staff time or, for internal proposals, generating the evidence to support a project. Efficiency savings are likely to be generated by providing clear expectations of the type and quality of evidence required to support a successful proposal and how decisions will be taken. Working more widely across England Scotland and Wales to ensure a consistent approach should support further efficiency.

Equality impact assessment (EqIA)

17. An Equality Impact Assessment screening has been undertaken in relation to the position statement and did not require a full impact assessment to be carried out.

Index of Annexes

Annex 1: Recent conservation translocation work and cases

Annex 2: Position Statement Conservation Translocations

Annex 3: Operational Guidance Note (Draft pending approval of position statement)

Annex 1: Recent conservation translocation cases and work

Case	Regulator role	Land manager	Adviser	Project delivery	Outcome
Pine Marten reinforcement project Mid Wales	X	X	X		Project approved, third party delivering on NRW estate
Reintroduction of Eurasian Beaver Carmarthenshire	X				Licence decision pending
Reintroduction of Eurasian Beaver in Ceredigion	X	X	X	X	Enclosure proposal not approved, reintroduction proposal has not proceeded to application stage
Freshwater Pearl Mussel Reinforcement				X	Project delivery by NRW underway
White clawed crayfish Reintroduction				X	Project delivery by NRW underway
European eel Source population				X	Project delivery by NRW underway
Water Vole reinforcement	X		X	X	Project delivery by NRW underway
Sand lizard re-introduction	X		X		Licence granted and translocation implemented
Introduction of biological control for Japanese knotweed	X				Licence for trials granted
<i>Cotoneaster cambricus</i> translocation on The Great Orme			X		Project delivery underway by Chester Zoo
Black Poplar reinforcement			X		Multiple sites across wales
Natterjack Toad reintroduction to the Dee Estuary	X		X	X	Reintroduction implemented

Annex 2: Position Statement for Conservation Translocations

1. Introduction

The purpose of this document is to explain how we will regulate, participate in and advise on the issue of conservation translocations. It is important that our staff, stakeholders and the wider general public understand our approach and are confident in our ability to address this issue.

Translocation is the deliberate movement by humans of living organisms from one area, with release in another. Conservation translocation is a translocation where the primary objective is to support ecological resilience. There are two types of translocation:

- **Population restoration** is any conservation translocation to within indigenous range.
- **Conservation introduction** is the intentional movement and release of an organism outside its indigenous range.

Conservation translocations can be carried out for different reasons, to reintroduce a species, to reinforce a species, to avoid extinction of a species or to promote a particular ecological outcome. These should take account of and contribute to improving the resilience of ecosystems; diversity between and within ecosystems, the connectivity, scale, condition and adaptability of ecosystems.

2. Aims and objectives

Our **aim** is to ensure that we manage the issue of conservation translocations in a transparent, coordinated and professional way, taking into account relevant regulatory requirements, policy priorities, resource implications and, after completing a thorough risk assessment.

Our **objectives** are to:

- Ensure our different roles in relation to conservation translations are clearly communicated and understood
- Discharge our legislative responsibilities
 - We have a statutory obligation to consider licence applications to release organisms in to the environment under the Wildlife and Countryside Act 1981(amended 1985).
 - The Environment (Wales) Act 2016 states that NRW, as a public body, must seek to maintain and enhance biodiversity in the exercising of its functions in relation to Wales and in doing so promote the resilience of ecosystems. Resilience in this context is the diversity between and within ecosystems; the connections between and within ecosystems; the scale of ecosystems; the condition of ecosystems (including their structure and functioning); and the adaptability of ecosystems.
- Deliver commitments in accordance with our purpose, duties and Corporate Plan objectives. Corporate plan objective E3 states that: *“We will play our part and work with others to halt biodiversity loss in order to help ensure that, by 2020, ecosystems are more resilient”*.
- Keep our stakeholders informed of our approach, and support partnership working.

3. Guiding principles

- This position statement is not intended to promote or deter conservation translocations. It defines our approach and explains how we will act when consulted.
- Conservation translocations should only be considered when all other methods of resolving the issue have been attempted and failed or have been discounted after appropriate consideration.
- Conservation translocations should only take place after thorough risk assessment, in accordance with the International Union for Conservation of Nature (IUCN) [Conservation Translocation Guidelines](#) (2013). These guidelines are designed to help evaluate whether a translocation is appropriate, feasible and to understand the risks behind any translocation. They include assessing if translocation is the appropriate course of action in achieving the objective of the project (as opposed to habitat management etc.), advice on evidencing project feasibility both biologically and for society, compliance with regulations and the need for project planning. Other considerations include the availability of source individuals for the translocation, release site selection and strategy. Important aspects to include are monitoring and the continued management after release. Projects should address disease risk management and biosecurity.
- Our assessment of proposals will consider the principles of Sustainable Management of Natural Resources (SMNR) including the impact on resilience of ecosystems.
- In considering proposals we will assess the impact on International and European commitments as well as domestic priorities.
- Our risk-based decisions will be based on the principles of precaution and proportionality. If there is considerable uncertainty in the level of risk, or where there is a risk that unacceptable damage may occur, translocations should not proceed.
- Proposers / applicants should also demonstrate that the objectives and outcomes of any project contribute to our objectives, purpose and the SMNR principals including building resilience.
- NRW's involvement in direct delivery of conservation translocations will be considered where the outcomes meet NRW's responsibilities, duties or corporate objectives and NRW is considered the most appropriate party to deliver the project.

4. NRW's role

We have four roles, which are not mutually exclusive, in relation to conservation translocations, as explained in Table 1.

Table 1

Our role	Description
Regulator	The licensing process considers the appropriateness of a conservation translocation including any potential impacts. We are also responsible for issuing any consents, if considered appropriate, for a translocation that would affect Sites of Special Scientific Interest (SSSIs). Assessment of potential impacts to protected wildlife sites and their features would be legally required including Habitats Regulations Assessment. When applying for a licence, applicants will be expected to provide details of those applying for the licence, including their experience and qualifications. The application must be accompanied by a project

Our role	Description
	proposal and method statement detailing all aspects of the project including the justification for the project, where species are sourced, where they are to be translocated to, the method of impoundment and release, timescales and any monitoring requirements. Application forms can be found on our website.
Land manager	We will consider applications for translocations to or from the land that we manage. Consideration will include the compatibility of the proposal with our objectives in managing the land concerned and the impact on the outcomes we are seeking from the area in question. We will also consider the impacts, now and in the future, of the proposal on neighbouring landowners/managers interests. Applicants submitting proposals will be expected to provide such information so that we can undertake a full risk assessment.
Advisor	<p>We may provide advice relating to the scientific relevance and appropriateness of the project.</p> <p>This could include:</p> <ul style="list-style-type: none"> • the appropriateness and sufficiency of the stock for release • the methods of release • the suitability of location • evidence that species are no longer present where relevant • that previous causes of extinction have been rectified • that habitat management is in place and disease risk has been addressed • that other means for recovery have been examined etc. <p>We may provide advice on specific proposals to help assess their impact on land management. This may include evaluating the impact on commercial programmes, assessing the implications for flood risk management, evaluating whether the proposal will constrain land management, or ensuring that compliance with certification is not affected, e.g. UK Forestry Standard.</p>
In Project Delivery	In order to fulfil our duties we may determine that translocation is the best option to ensure species recovery. We are committed to working with partner organisations to deliver the most effective outcomes, and in some cases, it will be for other organisations to lead partnership projects. We encourage this approach where it will deliver the best outcomes for all parties concerned. Whether working independently or in partnership we will ensure that the same rigorous process of assessment is applied to NRW led projects, as those from external applicants. In all cases, IUCN guidelines will be followed and impact upon our objectives and other land owners' interests assessed.

5. Delivery

We will identify a Lead Officer for each proposal or application received. The Lead Officer will vary depending on the roles that we have in relation to the proposal (regulator, land owner, advisor, in delivery). The Lead Officer will coordinate our external response following internal consultation.

Internally, staff will consider conservation translocation proposals in accordance with an Operational Guidance Note that clearly explains the processes and procedures that must be followed, the considerations that must be taken into account, and how and from whom approval must be obtained. Where appropriate, our decision will take account of the organisational costs of a translocation, both internally and on others in relation to the project timeframe and long term implications. When relevant we may seek stakeholder input to inform our decision. We will seek advice from the Wales Biodiversity Strategy Board in respect of the implementation of the Nature Recovery Plan objectives.

We will respond within 5 working days to acknowledge an application for a licence or permit, or access to land. Licences will be processed within 30 working days of receipt of all the relevant information. In all other cases, we will aim to provide the applicant with a response within 30 working days of receipt of all the relevant information. In the event that we require further information in order to assess a proposal, the timeframe for response will halt until such information has been supplied by the applicant.

6. Evaluation and monitoring

We will undertake a first review of this position statement after 12 months, and thereafter every two years, unless there are legislative or other business changes that require it to be reviewed sooner.

7. Equality and diversity

As an organisation, we are committed to a policy of equality and diversity. An Equality Impact Assessment has been undertaken in relation to the position statement, and is available on request.

8. Document control

Document owner: Chris Tucker

Document approved by:

Date of first publication:

Date of last update: