15 December 2015

BVA RESPONSE TO THE LYNX UK TRUST CONSULTATION ON THE TRIAL REINTRODUCTION OF LYNX TO ENGLAND

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

Do you have any initial comments with regards to the proposed Project?

2) We are pleased to be given the occasion to respond to the Lynx UK Trust consultation on the trial reintroduction of lynx to England and have sought input from our Veterinary Policy Group, which includes representation from the British Veterinary Zoological Society and other specialist divisions. It is essential that the planned re-introduction of previously native species takes place in line with national and international legislation and guidance, includes a thorough and comprehensive feasibility assessment, ensures the welfare of the released species, other farmed and non-farmed species and man, includes a thorough risk assessment with veterinary involvement (including disease risks and an associated disease risk management strategy), ensures that all stakeholders are fully consulted, ensures that initial releases are closely monitored, and ensures there is an exit strategy incorporated if the re-introduction does not proceed as expected.

Do you have any comments about the way in which this national consultation is being carried out?

3) BVA are encouraged to see the Project, including this national consultation, being carried out in line with the International Union for the Conservation of Nature (IUCN) Guidelines for Re reintroductions and Other Conservation Translocations which have been adopted by Natural England to inform what must occur before a licence will be issued to reintroduce a species of animal to the wild in England. We understand that the steps to be taken include:

- An initial appraisal of the appropriateness of a reintroduction;
- A full feasibility study;
- Risk, benefit and impact assessments;
- National and local stakeholder consultation and engagement; and
- The design of a comprehensive Project plan

Do you have any comments about the appropriateness of the Project?

4) We note that the consultation document concludes that it would be appropriate to proceed with the Project in England due to England’s history, the likely benefits and minimal predicted risks of a trial lynx reintroduction, public sentiment towards the idea and the legal obligations to which England and the UK are bound. In light of uncertainties regarding a) the cause and time course of lynx disappearance from Britain (Yalden, 1999), b) whether any English woodlands could in fact support a viable population of lynx, and c) whether the English road
network and relatively dense human population would hinder establishment of a viable population, we would recommend a more comprehensive and extensive habitat feasibility assessment for English sites than the 1-2 month project currently planned. A comprehensive site feasibility study, emulating the Hetherington (PhD) study for Scotland, would be desirable. In addition, BVA would like to reiterate the necessity for a thorough risk assessment with veterinary involvement, including changes in the epidemiology of diseases caused by the release and considering the disease risks posed to other species, including man, and inclusion of a management plan to counter any such risks. We understand that this application forms part of a trial which would produce and gather the necessary raw data required for a full and comprehensive study of desirability and feasibility of the reintroduction of lynx to England, but nonetheless the theoretical groundwork for the study must be robust before any live animals are involved, either translocated lynx or indigenous British wildlife or domesticated species.

Do you have any comments with regard to the ecological, social and economic feasibility of the Project?

5) On the basis of the ecological knowledge on lynx provided in the consultation document the ecological feasibility with regards to habitat suitability requires more detailed consideration, alongside consideration of climate, and the source of the founder animals. Information on the presence or absence of distinct genetic clades within Eurasian lynx populations would be useful to determine which populations are likely to be most representative of historic lynx populations in the UK. The feasibility with regards to the welfare of sheep populations, other prey species and of the lynx themselves is best addressed by following the IUCN Guidelines for Reintroductions and Other Conservation Translocations. The information provided on feasibility with regards disease and parasite considerations could include more detail on the specific measures to be taken. However, we acknowledge that there is an intention to assess all considerations with reference to the IUCN Guide to Wildlife Disease Risk Assessment. This disease risk assessment framework should include a detailed disease risk management plan.

6) With regards to social feasibility, we are encouraged that the consultation process has been thoroughly planned with local stakeholders to be consulted once again once trial release areas are confirmed.

7) The economic feasibility section of the consultation document and cost-benefit analysis discuss a compensation scheme for livestock predated on by lynx which would benefit from definition of the precise criteria for establishing where an animal has been predated upon by lynx, the planned compensation process and level of compensation. The project team should be mindful of the potential impact of road traffic on population establishment and on the potential expense of implementing mitigation measures for both this and lynx depredation of livestock. The costs of post-release monitoring and mitigation measures need to be recognised and factored into project planning.

Do you have any comments on the potential risks and benefits of this project?
8) Reducing or limiting the size of prey populations such as roe deer could be considered a benefit, but BVA is keen that robust monitoring of the impact on other species including, but not limited to, the brown hare, grouse and pheasant to ensure there are no negative impacts.

The consultation document states that all lynx will be quarantined and disease-screened before being released and whilst BVA support these measures we request further clarification on both of these aspects.

Do you have any comments on the measures proposed to mitigate the identified risks?

9) We believe the measures proposed to mitigate the identified risks appear reasonable and could benefit from inclusion of an action plan for as yet unidentified risks. As part of the disease risk analysis process, a disease risk management strategy will be essential.

Do you have any comments with regard to the proposed release sites for the Project and, in particular, the site which you believe to be most appropriate?

10) BVA has some concerns that selected forest release sites do not resemble the previous habitat of the lynx as many forests are largely monoculture and may not be truly suitable for translocation of lynx. The British Deer Society reports that based on IUCN Red List criteria and population viability analyses, a population of lynx should have at least 250 individuals to be viable for a period of at least 100 years. Within Britain, a sufficient area of contiguous woodland habitat to support this number of animals only occurs in the Scottish Highlands, although the suitability of these woodlands in terms of understory vegetation and structure still requires investigation. Further to these concerns, lowland and upland sheep production in the UK occurs on a large scale. It has been suggested that lynx may adapt to hunt the easiest prey available, potentially lambs, and as such the proximity of sheep grazing to the potential release sites should be a consideration.

11) The proposed timeframe for selecting a release area in England should be much longer than the 1-2 month period stated in the consultation document. Instead, we recommend that the project team undertake a much more detailed habitat feasibility assessment, to specifically assess the habitat suitability of English woodlands (complimenting the Hetherington (PhD) study on Scottish sites), that incorporates an assessment of road traffic impacts, potential for human-lynx conflict, and the lessons learned from similar projects on the continent. It is important that this is fully assessed so as to maximise the project’s likelihood of success, and to minimise negative welfare impacts on released animals.

Do you have any comments about the proposed release and exit strategies for the Project?

12) The proposed release strategy appears sensible. However, BVA is concerned that the exit strategy for the Project is not detailed enough and could benefit from clear definition of the reasons for implementing an exit strategy. Furthermore, the options within the exit strategy include movement to a zoo collection, which may not be appropriate for a wild animal; neutering and return to the wild, which is in conflict with triage considerations for wildlife
rehabilitation because it is not usual to have neutered animals in the wild; and finally the well-known humane methods for the control of animals which would benefit from precise definition.

Do you have any comments regarding the proposed post-release monitoring programme for the Project?

13) BVA would appreciate further clarification on the communication, analysis and availability of post-release monitoring data. Post-release monitoring should include health surveillance and thorough post-mortem examinations of any animals that die, in order to monitor threats to the released population, e.g. human persecution, as well as disease incidence, so as to inform conservation management.

Do you have any additional comments in relation to this document or the current Project proposals?

14) BVA believes that arguments supporting the reintroduction of the Eurasian lynx, which requires habitat that is difficult to provide in modern Britain and will require a well-funded compensation scheme for domestic livestock keepers may be outweighed by known and unknown consequences. It may be preferable to spend resources protecting existing endangered species. However, if the Project were to proceed we would consider it preferable that a trial project in England followed a full trial release project in Scotland (where multiple parties appear to agree that there is a large enough woodland site to support a viable population of lynx), and evaluated lessons from that, before progressing further.

References:
ISBN 1408128713, 9781408128718
15 December 2015

BVA RESPONSE TO THE LYNX UK TRUST CONSULTATION ON THE TRIAL REINTRODUCTION OF LYNX TO SCOTLAND

1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2) BVA’s Scottish Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of the Scottish members on Scottish and United Kingdom issues.

Do you have any initial comments with regards to the proposed Project?

3) We are pleased to be given the occasion to respond to the Lynx UK Trust consultation on the trial reintroduction of lynx to Scotland and have sought input from our Veterinary Policy Group, which includes representation from the British Veterinary Zoological Society and other specialist divisions. It is essential that the planned re-introduction of previously native species takes place in line with national and international legislation and guidance, includes a thorough and comprehensive feasibility assessment, ensures the welfare of the released species, other farmed and non-farmed species and man, includes a thorough risk assessment with veterinary involvement (including disease risks and an associated disease risk management strategy), ensures that all stakeholders are fully consulted, ensures that initial releases are closely monitored, and ensures there is an exit strategy incorporated if the re-introduction does not proceed as expected.

Do you have any comments about the way in which this national consultation is being carried out?

4) BVA are encouraged to see the Project, including this national consultation, being carried out in line with the International Union for the Conservation of Nature (IUCN) Guidelines for Reintroductions and Other Conservation Translocations which have been adopted by Natural England to inform what must occur before a licence will be issued to reintroduce a species of animal to the wild in England. We understand that the steps to be taken include:
   - An initial appraisal of the appropriateness of a reintroduction;
   - A full feasibility study;
   - Risk, benefit and impact assessments;
   - National and local stakeholder consultation and engagement; and
   - The design of a comprehensive Project plan

Do you have any comments about the appropriateness of the Project?

5) We note that the consultation document concludes that it would be appropriate to proceed
with the Project in Scotland due to Scotland’s history, the likely benefits and minimal predicted risks of a trial lynx reintroduction, public sentiment towards the idea and the legal obligations to which Scotland and the UK are bound. BVA would like to reiterate the necessity for a thorough risk assessment with veterinary involvement, including changes in the epidemiology of diseases caused by the release and considering the disease risks posed to other species, including man, and inclusion of a management plan to counter any such risks. We understand that this application forms part of a trial which would produce and gather the necessary raw data required for a full and comprehensive study of desirability and feasibility of the reintroduction of lynx to Scotland, but nonetheless the theoretical groundwork for the study must be robust before any live animals are involved, either translocated lynx or indigenous British wildlife or domesticated species.

Do you have any comments with regard to the ecological, social and economic feasibility of the Project?

6) On the basis of the ecological knowledge on lynx provided in the consultation document the ecological feasibility with regards to habitat suitability requires more detailed consideration, alongside consideration of climate, and the source of the founder animals. Information on the presence or absence of distinct genetic clades within Eurasian lynx populations would be useful to determine which populations are likely to be most representative of historic lynx populations in the UK. The feasibility with regards to the welfare of sheep populations, other prey species and of the lynx themselves is best addressed by following the IUCN Guidelines for Reintroductions and Other Conservation Translocations. The information provided on feasibility with regards disease and parasite considerations could include more detail on the specific measures to be taken. However, we acknowledge that there is an intention to assess all considerations with reference to the IUCN Guide to Wildlife Disease Risk Assessment. This disease risk assessment framework should include a detailed disease risk management plan.

7) With regards to social feasibility, we are encouraged that the consultation process has been thoroughly planned with local stakeholders to be consulted once again once trial release areas are confirmed.

8) The economic feasibility section of the consultation document and cost-benefit analysis discuss a compensation scheme for livestock predated on by lynx which would benefit from definition of the precise criteria for establishing where an animal has been predated upon by lynx, the planned compensation process and level of compensation. The project team should be mindful of the potential impact of road traffic on population establishment and on the potential expense of implementing mitigation measures for both this and lynx depredation of livestock. The costs of post-release monitoring and mitigation measures need to be recognised and factored into project planning.

Do you have any comments on the potential risks and benefits of this project?

9) Reducing or limiting the size of prey populations such as roe deer could be considered a benefit, but BVA is keen that robust monitoring of the impact on other species including, but
not limited to, the brown hare, grouse and pheasant to ensure there are no negative impacts.

The consultation document states that all lynx will be quarantined and disease-screened before being released and whilst BVA support these measures we request further clarification on both of these aspects.

**Do you have any comments on the measures proposed to mitigate the identified risks?**

10) We believe the measures proposed to mitigate the identified risks appear reasonable and could benefit from inclusion of an action plan for as yet unidentified risks. As part of the disease risk analysis process, a disease risk management strategy will be essential.

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**Do you have any comments about the proposed release and exit strategies for the Project?**

12) The proposed release strategy appears sensible. However, BVA is concerned that the exit strategy for the Project is not detailed enough and could benefit from clear definition of the reasons for implementing an exit strategy. Furthermore, the options within the exit strategy include movement to a zoo collection, which may not be appropriate for a wild animal; neutering and return to the wild, which is in conflict with triage considerations for wildlife rehabilitation because it is not usual to have neutered animals in the wild; and finally the well-known humane methods for the control of animals which would benefit from precise definition.

**Do you have any comments regarding the proposed post-release monitoring programme for the Project?**

13) BVA would appreciate further clarification on the communication, analysis and availability of post-release monitoring data. Post-release monitoring should include health surveillance and thorough post-mortem examinations of any animals that die, in order to monitor threats to the released population, e.g. human persecution, as well as disease incidence, so as to inform conservation management.
Do you have any additional comments in relation to this document or the current Project proposals?

14) BVA believes that arguments supporting the reintroduction of the Eurasian lynx, which requires habitat that is difficult to provide in modern Britain and will require a well-funded compensation scheme for domestic livestock keepers may be outweighed by known and unknown consequences. It may be preferable to spend resources protecting existing endangered species. However, if the Project were to proceed we would consider it preferable that a trial project in England followed a full trial release project in Scotland (where multiple parties appear to agree that there is a large enough woodland site to support a viable population of lynx), and evaluated lessons from that, before progressing further.

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