



The Moorland Association

Cumbrian White-Tailed Eagle Project

Stakeholder Response (Draft)

Note to members

This document begins at question 6b because the earlier questions relate mainly to background and organisational information. Questions 6b, 7, 8 and 9 contain the main substantive issues on which member views are likely to be most helpful, and these sections are therefore being circulated for member review ahead of final submission.

We would be very grateful for any comments, suggestions or drafting points members may have, and would appreciate receiving these **by 25 March** to allow time for them to be considered and, where appropriate, incorporated into the final Moorland Association response.

Q6.b. Thoughts or feedback you have on the social consultation report.

6.1 Directly affected stakeholders remain concerned

The Moorland Association considers that the Social Consultation Report is significant not because it resolves the question of social acceptability, but because it demonstrates that substantial concerns remain among those most likely to be directly affected by any reintroduction. In particular, the report records that respondents identifying with farming and landowning interests were significantly more opposed than other interest groups, and it identifies four main themes from the farming focus groups: “Protect what’s already struggling”, “Threats to livelihoods and lambing”, “Decisions without us” and “Who benefits? Not us.” In our view, those themes reflect serious and legitimate concern about the practical consequences of the proposal for those managing land and livestock.

The report is also important because it records these concerns in concrete rather than abstract terms. It refers to risks to vulnerable ground-nesting birds, concerns about lamb losses and breeding stock, stress and disruption during lambing, uncertainty about long-term management and accountability, and a perception that costs may be borne locally without compensation or clear local benefit. The farmer interviews broadly reinforced those themes, including under the headings of “livelihood risks” and “livelihood protection”, and referred to practical issues including predation risk, protection measures, reporting burdens and management complexity. In our view, these are not peripheral matters, nor are they issues that can be dismissed as perception alone. They are practical and foreseeable concerns that go directly to the fairness, credibility and social legitimacy of the proposal.

Although the report also notes that opinion within the farming community is not uniform, and that some interviewees felt the focus group outputs did not capture the full range of views, that does not diminish the significance of the concerns recorded. The relevant point is not whether every affected person expresses the same view. The relevant point is that the report itself identifies repeated and substantial concern among those most likely to bear the practical burdens of any reintroduction.

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6.2 Headline support should not be treated as social acceptability

More broadly, the Moorland Association would caution against treating headline overall support figures as sufficient evidence of social acceptability. The report records strong aggregate support, but it also shows that likely burdens and risks may fall unevenly, particularly on sheep farmers and other land managers. In those circumstances, social acceptability cannot be reduced to a simple county-wide popularity test. Where one group is invited to value the symbolic, ecological or visitor appeal of a reintroduction, while another is expected to absorb the practical burden of living with its consequences, aggregate support figures risk giving a misleading impression of consent. The views of those most directly exposed should therefore carry particular weight.

This matters particularly because the project's own Social Consultation Report defines one of its three social acceptability criteria not as whether stakeholder concerns have been resolved, but whether the issues raised by stakeholders 'can be addressed'. In our view, that is too weak a test for a contentious reintroduction with potentially long-term practical consequences. A project should not be treated as socially acceptable simply because those promoting it believe concerns are capable of being addressed at some later stage. What matters is whether there is a clear, evidenced, funded and credible framework showing how those concerns will in fact be addressed in practice.

6.3 The consultation design gave formal weight too late to affected stakeholders

We recognise that the project team has undertaken a wide range of engagement activity. Nevertheless, in our view the consultation process suffers from a structural weakness in design which undermines confidence in the way social acceptability has been assessed. For a contentious proposal of this kind, the process should have been built around early, formal and meaningful input from those most likely to bear the practical burdens. Instead, the project ran an individual questionnaire over September 2024 to October 2025, reported a headline finding that 78% of respondents in the project region supported reintroduction, and only then stated that the "next step" was to collect organisational views through a stakeholder questionnaire to be run in February to March 2026.

That matters because the project's own pre-feasibility work recognises that this is not the sort of proposal that should be assessed by a simple region-wide popularity measure. It proposed a two-tier consultation approach, said that Tier 1 "core communities" were more likely to be affected and should be prioritised, and envisaged working with relevant stakeholders to co-develop predation mitigation or compensation protocols, success indicators and exit strategies. On that logic, directly affected stakeholders were not peripheral consultees; they were supposed to be central to the design of the project's safeguards. Yet the formal stakeholder questionnaire came after the public-facing social report and after the headline support narrative had already been established.

The weakness is not cured by saying that stakeholder meetings took place. The Social Consultation Report says those meetings were held between September 2025 and March 2026, but also states that no data was collected in them. In other words, affected organisations were invited to hear presentations and discuss the project, but the formal capture of organisational views was deferred to a later stage. For a contentious reintroduction, that is the wrong way round. It creates a real risk that the views of those expected to live with the consequences are diluted by a broader public sentiment that is easier to mobilise but less exposed to cost, disruption and conflict.

There is a further problem. Important elements of project design and conflict management remained unresolved while consultees were being asked for broad public backing and only later for formal

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stakeholder views. That weakens the legitimacy of any claim to “social acceptability”, because people cannot meaningfully endorse a project when many of the terms on which conflict would be managed remain unspecified.

In a contentious project, that sequencing is more than a procedural quibble. It risks producing exactly the wrong outcome: a public poll generates an attractive headline, while the concerns of those most directly exposed are acknowledged but structurally subordinated. The result is not a robust social mandate but a process in which stakeholder opposition can be portrayed as a minority view standing against an already established public consensus.

6.4 The process risks turning consultation into a popularity test

Although the project undertook a range of engagement activities, the way it has communicated the results places such heavy emphasis on headline support figures that the exercise risks being treated, and presented, as a popularity test rather than a genuine consultation.

6.5 The infographic presents a selective and potentially misleading picture

This concern is reinforced by the infographic used on the stakeholder questionnaire page. Although several of its headline figures do appear to come from the Social Consultation Report (including the statements that over 24,800 people were “engaged and consulted”, that 2,392 people completed the questionnaire, that around 1,938 respondents from the project region were counted, that 78% of project-region respondents supported reintroduction, and that over 285 people identifying with farming and landowning interests were engaged) the presentation is still selective and potentially misleading. The graphic highlights positive headline numbers, but omits the same report’s evidence that farming and landowning respondents were significantly more opposed than many other groups, and omits the themes emerging from farming engagement such as “decisions without us”, “threats to livelihoods and lambing” and “who benefits? Not us.”

It is difficult to treat the headline “24,800 engaged and consulted” figure as a reliable measure of active participation when approximately 87% of that total appears to derive from the leaflet-drop figure of 21,676. That figure is then presented alongside actual questionnaire responses, event attendance, interviews and newsletter sign-ups, despite those being materially different forms of engagement. Presented without that distinction, the total risks overstating the extent of meaningful participation. That risk is heightened by the report’s own statement that the stakeholder questionnaire was the “next step”, and by its acknowledgment that no data was collected in stakeholder meetings.

The report also gives no clear indication that this figure has been deduplicated. Since it appears to aggregate leaflet-drop reach, event attendance, questionnaire responses and newsletter sign-ups, it may include the same individuals more than once where they both received project material and also attended events, completed questionnaires or signed up for updates. In those circumstances, the total should not be treated as a reliable count of unique participants.

More broadly, the ecological claims in the graphic are also presented with greater certainty than the underlying documents warrant. The suggestion that research has shown released birds would grow into a healthy population rests on modelling which the PVA report itself shows to be sensitive to assumptions about supplementation and losses, with some scenarios becoming unviable. Likewise, the claim that studies show there is plenty of wild food is rooted in the diet review, but that review

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also records variability, limitations and the need for careful release-site selection in relation to sheep carrion and wild prey availability.

In our view, this further supports the concern that the consultation material has been framed in a way that accentuates reassurance and public support while muting uncertainty, conflict and the concerns of those most directly affected. In a contentious project, that is not a neutral presentation of evidence. It risks placing stakeholders in the position of appearing to dissent from an already-established public consensus, rather than being treated as an essential part of determining whether the proposal is socially acceptable in the first place.

6.6 Overall conclusion on the social consultation report

Overall, the Moorland Association's view is that the Social Consultation Report should be read as evidence of unresolved concern, uneven distribution of risk, and the absence of a settled social mandate among those most likely to be affected. It identifies these issues more clearly than it resolves them. Questions of long-term management, accountability, conflict handling, reporting burdens, compensation or cost-sharing, and exit strategy remain central. In our view, the report should not be taken as evidence that these matters have been satisfactorily addressed, but as evidence that they remain live and require clear, credible and enforceable answers before any reintroduction could responsibly proceed.

A further reason for caution is that the project's own material makes clear that several important elements of the assessment remain unfinished. The Social Consultation Report states that a shadow Habitats Regulations Assessment is underway, to be followed by a wider ecological assessment, that a Heritage Impact Assessment is being undertaken, and that further practical work is still being done on identifying a suitable source population, mapping the translocation pathway and completing a Disease Risk Assessment. In our view, that reinforces the point that consultees are being asked to respond before a number of central ecological, legal, heritage and practical questions have been fully resolved. For a project of this kind, those are not peripheral details to be filled in later; they are part of the basis on which social acceptability and responsible decision-making should be judged.

Q7. What does your organisation think the main impacts of a white-tailed eagle reintroduction in Cumbria would be?

The Moorland Association considers that the proposal carries significant unresolved risks and potentially serious adverse consequences for those managing land in Cumbria, and that these have not yet been adequately assessed or addressed.

7.1 Claimed benefits should be treated with caution

Supporters of the proposal claim that a reintroduction could contribute to nature recovery, public interest in the natural environment and local nature-based tourism, but those asserted benefits remain uncertain and do not remove the need for proper scrutiny of the burdens and risks likely to fall on those most directly affected. Although the project presents white-tailed eagles as a potential flagship species, that aspirational case should not be allowed to obscure the unresolved questions about practical impacts, conflict management, fairness and long-term responsibility. Any claims of tourism benefit should, however, be treated with some caution. While the Isle of Wight sea eagle project appears to have been supported by pre-release socio-economic feasibility work, we have not

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seen a clearly quantified post-release assessment demonstrating realised economic uplift on the Isle of Wight comparable to the better-known Mull figures. Potential benefit should therefore not be presented as though it were already established local economic fact.

Evidence from elsewhere should be handled carefully for the same reason. While white-tailed eagles have been associated with significant wildlife-tourism benefits in particular places such as Mull, those outcomes are highly context-specific and depend on geography, visitor markets, local infrastructure and the way benefits are captured locally. They should not be assumed to transfer automatically to Cumbria. If tourism or wider socio-economic uplift is relied upon as part of the case for reintroduction, the project should be expected to provide an independent baseline, a clear benefits-realisation plan, and a framework for monitoring whether any claimed gains actually materialise and how they compare with localised costs.

7.2 Risks to released birds: mortality and welfare

It should also be recognised that the proposal would create risks to the released birds themselves. The project's own material indicates that factors such as collisions with wind turbines and power lines, together with unlawful killing, are relevant to population viability. In our view, those are not merely technical implementation matters but part of the proposal's likely impacts, because any reintroduction that exposes released birds to significant avoidable mortality or welfare risks cannot properly be assessed by reference only to hoped-for ecological benefits.

That concern is reinforced by experience from other English releases. The Isle of Wight project has recorded post-release mortality including a power-line collision and rodenticide poisoning. In our view, that is important because it shows that the principal welfare and survival risks are not hypothetical modelling assumptions but real operational burdens that can arise in practice even within a closely managed reintroduction. Any Cumbrian proposal should therefore explain in advance what monitoring, investigation, mitigation and response arrangements would apply to collisions, poisoning incidents and other avoidable mortality events.

7.3 Disease and biosecurity

Disease and biosecurity should also be recognised as a relevant impact category. The project's own material states that a Disease Risk Assessment has been commissioned and is still being undertaken, while the population viability analysis explicitly treats disease outbreaks as one of the factors capable of affecting population outcomes. In our view, that means disease risk cannot be treated as a minor technical matter to be resolved later. It is part of the proposal's likely impact profile from the outset, both because of the implications for the health and welfare of released birds and because any outbreak or biosecurity incident could affect confidence in the project and require an ongoing management response.

Experience from other recent UK sea-eagle projects underlines that these are real operational risks rather than hypothetical concerns. Post-release programmes have had to contend with mortality incidents and with disruption arising from disease risk and wider delivery constraints. In our view, that reinforces the need for the Cumbrian project to set out in advance realistic mortality assumptions, clear investigation and reporting arrangements, and explicit pause mechanisms if disease, welfare or other population-loss factors become material.

7.4 Disturbance, access and nest protection

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A further potential impact is that the establishment of breeding white-tailed eagles could create pressures relating to disturbance, access and nest protection. The project's own pre-feasibility work identifies levels of disturbance and access agreements with landowners as relevant considerations in assessing suitable habitat, and it also envisages that, if desirable, a strategy may be needed for managing visitors who wish to see white-tailed eagles. In practice, a high-profile species of this kind can bring increased public interest to particular locations, with possible consequences for recreation management, nest confidentiality, disturbance control and landowner relations. In our view, these issues should be recognised as part of the proposal's likely impacts, rather than treated only as secondary operational matters to be worked through later.

Experience with other recovering raptor populations in Cumbria also cautions against assuming that initial establishment necessarily leads to a straightforward, secure or self-sustaining long-term outcome. Even where return or breeding activity has been recorded, populations may remain limited, unevenly distributed, and reliant on continuing protection, monitoring and management. In our view, that underlines the need for this proposal to be assessed on the basis of realistic uncertainty and long-term practical consequences, rather than on any assumption that release alone resolves the relevant ecological or management issues.

7.5 Fairness, uneven burdens and the cultural landscape

It is also important to recognise that the costs and benefits of any reintroduction are unlikely to be distributed evenly. The project's own social consultation records a clear concern among those most likely to be affected that costs would be borne locally, without compensation, while any claimed benefits would be uncertain, external or diffuse. Although some consultees identified possible local economic or environmental gains, the material also records a strong theme of "Who benefits? Not us", particularly among farming participants. In our view, that imbalance is itself a significant potential impact of the proposal, because a project whose benefits are said to accrue broadly while its risks, stress and management burdens fall disproportionately on particular land managers or communities is likely to generate continuing resentment and reduce confidence in the fairness of the scheme.

That is not simply an economic issue. In landscapes shaped by long-established land management and farming practice, questions of autonomy, identity, local knowledge and social legitimacy also matter. A proposal that is experienced locally as something done to communities rather than with them is likely to deepen resistance even where some wider public support exists.

7.6 Impacts on sheep farming and rural land management

However, the principal negative impact is likely to fall on land managers, and in particular on the sheep farming sector, through added risk, stress, labour, uncertainty and potential loss at the most sensitive times of year. Even where measured predation is disputed or difficult to evidence, the additional vigilance, disruption and exposure to risk around lambing time are themselves significant impacts and should not be dismissed. In rural communities, uncertainty, stress, additional vigilance, time costs and lack of confidence in official assurances are practical burdens in their own right, whether or not every loss can be formally measured or attributed. If these concerns are not addressed credibly and early, the project risks creating division between conservation bodies and the people who manage the landscape on a daily basis.

7.7 Wider impacts on access, monitoring, trust and governance

A further potential impact is that a reintroduction could create an ongoing burden in relation to monitoring, enforcement and local trust. Where a contentious species is introduced into a landscape

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with existing land-use tensions, the consequences are not confined to direct ecological or farming effects. There may also be a need for clear reporting arrangements, investigation of incidents, and sustained community engagement if disputes arise. In our view, those governance and resource implications should be recognised as part of the proposal's likely impacts.

The implications may also extend beyond livestock and direct incident management. Scottish modelling work has recognised the potential for conflict with multiple land uses, including sheep farming, forestry, renewable energy and related infrastructure. In our view, that reinforces the point that this proposal should not be assessed solely as a species-restoration question. It may also have implications for wider land-use planning, operational constraints and future consenting decisions, and those strategic effects should be addressed openly rather than treated as peripheral or speculative.

Given the prominence of sheep farming concerns in the consultation material, and the existence of other white-tailed eagle populations and reintroduction projects from which relevant evidence could be drawn, we would also have expected to see at least a high-level assessment of the potential economic impacts on farming businesses, including the possible scale of losses, the assumptions used, and the proposed approach to mitigation, compensation or cost-sharing if impacts arise. At present, the material appears to recognise those concerns without quantifying them in a way that allows consultees to judge their likely significance. In our view, that lack of transparency risks undermining confidence in the assessment process, particularly among those who may be asked to bear the costs of any negative impacts.

The project material identifies Natural England as funder of the 2022 pre-feasibility study, but we have not seen clear equivalent disclosure of who is funding the wider current project, or who would bear the costs of any release, monitoring, mitigation, compensation or long-term management.

That omission matters all the more because comparable schemes can generate substantial and continuing public cost. The Scottish sea eagle mitigation funding for 2025–26 was stated to total £970,000, illustrating that once a project moves beyond feasibility and into conflict management, monitoring and practical mitigation, the financial commitment may become both material and recurrent. In our view, consultees should therefore be told not only who is funding the current project, but what the expected whole-life costs are, who would meet them, and what would happen if those costs increased over time.

A further impact would be the creation of an ongoing management, monitoring and resource burden. The project's own pre-feasibility work states that any reintroduction would require a detailed post-release strategy and monitoring programme, and envisages future work on who would collect, analyse, store and report data on matters including mortality, health, movements, ecological effects and socio-economic costs and benefits. The social consultation material also records concerns about reporting burdens and management complexity among those who may be most directly affected. In our view, these are not merely delivery details: they are part of the proposal's likely impacts, because they imply continuing demands on project staff, regulators, land managers and public authorities long after any initial release has taken place.

We are also concerned that any additional pressure on already fragile upland sheep farming systems could have wider implications for the Lake District's cultural landscape. The Outstanding Universal Value of the English Lake District World Heritage Site is explicitly bound up with its continuing agropastoral farming system, including traditional sheep farming and hefted flocks. If a reintroduction

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were to add materially to the pressures facing that system, whether through direct losses, added risk, or reduced confidence in the viability of hill farming, the consequences could extend beyond individual farm businesses and into the maintenance of the historic landscape itself. This is another reason why the project should assess not only ecological impacts in the narrow sense, but also the possible cumulative effects on the farming systems that help sustain the Lake District's recognised cultural heritage

There are also legitimate concerns in relation to game interests, wildfowl and some fisheries interests, and those should not be dismissed simply because impacts may be uneven or harder to quantify in advance. Broad dietary generalisations do not answer the real consultation question, which is whether local and unevenly distributed impacts on vulnerable farming and sporting interests could arise in Cumbria and how those would be managed if they do. It is therefore important not to rely on broad averages alone when considering likely outcomes in Cumbria.

7.8 Conflict management and safeguards

A key impact of any reintroduction would be the need for a clear, credible and properly resourced conflict-management strategy from the outset. In line with IUCN guidance on human-wildlife conflict and coexistence, this should not be treated as an afterthought to release, but as a core condition of the project. It should include early identification of likely conflict hotspots, meaningful involvement of affected stakeholders, transparent incident reporting and investigation, practical mitigation, fair arrangements for compensation or cost-sharing where losses occur, and a clear adaptive-management framework if impacts prove greater than anticipated. Without such a strategy, the principal risk is not only ecological uncertainty but avoidable social conflict and loss of trust.

In practice, that also means the project would need more than a general commitment to manage conflict. It would require clear incident-response arrangements, including who would receive reports, who would investigate them, what specialist expertise would be available, what powers or responsibilities each body would hold, and how that capacity would be funded over time. Without that operational capability, a conflict-management framework risks remaining theoretical rather than providing real assurance to those expected to live with the consequences.

Nor would it be sufficient simply to refer in general terms to compensation or cost-sharing. Any such scheme would need clear eligibility rules, agreed prevention requirements, sustainable funding and transparent administration. Otherwise it risks being either too vague to command confidence or too weakly designed to operate fairly in practice.

Any such framework would also need to address the practical difficulty of verifying and processing claims. As the IUCN guidance makes clear, compensation or insurance schemes can be costly and administratively demanding to operate; they require agreed methods of verification, timely and reliable processing, incentives for prevention, and long-term financial sustainability. Those issues are particularly important where alleged losses may be disputed, difficult to attribute, or involve indirect effects such as stress, disruption or added labour. In our view, the project should not be allowed to rely on vague references to mitigation or compensation without first setting out a workable, auditable and properly resourced system for verification, decision-making and payment.

7.9 Planning gaps that remain unresolved

While the project material recognises the need for post-release monitoring, evaluation and an exit strategy, these appear still to be matters for the future feasibility stage rather than arrangements that

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have yet been clearly set out for consultees. In our view, a credible framework for monitoring potential negative impacts, identifying who will be responsible, specifying how findings will be reported, and explaining what management action will follow if problems arise should be in place before any release proceeds. Without that clarity, it is difficult for consultees to assess how the project's risks would be managed in practice.

In our view, this is not a minor omission but a serious governance defect. The material does not clearly explain who would bear responsibility if the project gave rise to complications in practice, whether in relation to livestock losses, disputed incidents, reporting and verification burdens, monitoring costs, adaptive management, or any decision to intervene, compensate, suspend or terminate the project. Nor does it clearly identify who would fund those responses, who would assess claims, who would make disputed judgments, or on what clear and enforceable basis affected parties could seek redress. It is not acceptable for a project of this kind to proceed on the basis that such matters will be worked out later. If others are expected to live with the consequences, they are entitled to know in advance who is answerable, who pays, who decides, and what happens if the project causes problems in practice.

While the project material refers to the need for an exit strategy, it does not appear to explain what the trigger points for that strategy would be, who would decide whether those thresholds had been met, or what practical consequences would follow if they were. That lack of clarity matters because the project's own evidence indicates that several factors may affect population viability after release. In our view, the project should therefore set out in advance a clear and workable framework for incident reporting, assessment, decision-making and management response, including what would happen if post-release losses or other adverse outcomes became significant in practice. Without that clarity, consultees cannot properly assess how risks would be managed.

In our view, those matters should be set out clearly in advance, rather than left unresolved at consultation stage.

Our recent experience of hen harrier management in England is also relevant in this context. Although not a reintroduction, it provides a recent example of the difficulties that arise when conflict-management tools depend on official licensing decisions that may later be withheld. Natural England's decision not to issue a 2025 hen harrier brood management licence, following the conclusion of the trial, has reinforced the importance of having a conflict-resolution framework that is not vague, discretionary, or uncertain in the eyes of those expected to live with the consequences.

7.10 Regulatory and ecological matters still requiring explanation

The project would also need to engage properly with the Habitats Regulations. At a minimum, it should be screened to determine whether likely significant effects on any relevant European site, including functionally linked land where relevant, can be excluded on the basis of objective information. If they cannot, the competent authority would be required to undertake an appropriate assessment before any necessary licence or consent is granted. Given the potential for wide-ranging movement by white-tailed eagles, this should be treated as a central part of the project's design and evidence base, not as a procedural afterthought.

We would in any event have expected that screening work, and at least a summary of the wider ecological assessment it informs, to have been available before or at least alongside consultation. This is a fundamental part of understanding the project's likely effects on relevant European sites and

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functionally linked land. Without it, consultees are being asked to comment on impacts without sight of a key element of the assessment framework. While the formal legal requirement is that the competent authority must complete any necessary Habitats Regulations Assessment before granting the relevant licence or consent, as a matter of sound process and informed consultation the screening stage should not be left until after views have already been sought.

We also note that the consultation material does not appear to identify the donor population from which any founder birds would be taken. In our view, that is a significant omission, since the source population, the legal and practical basis for sourcing birds, and the implications for genetics, welfare and impacts on the donor population are all fundamental to an informed assessment of the proposal. Nor is it a trivial matter from a feasibility perspective: the habitat and ecological conditions from which donor birds are sourced may have an important bearing on their suitability for release into the proposed area, and this should be explained clearly rather than left unresolved at consultation stage.

There is also a more practical reason why the donor population should not be treated as a detail for later resolution. The Isle of Wight project has shown that donor-stock availability, licensing constraints and disease risk can affect whether releases proceed at all, including pauses linked to avian influenza risk and poor breeding years in donor areas. In our view, that demonstrates that the source population is not simply a background technicality. It is a central part of project deliverability, timing and governance, and the consultation should therefore explain what contingency arrangements would apply if donor supply, licensing or disease considerations disrupted the intended release programme.

We also question whether the proposed pace of release has been sufficiently justified. Moving from no white-tailed eagles to a proposed release of at least 66 birds over five years would represent a substantial intervention in a relatively short period. In our view, consultees are entitled to understand why that scale and pace of release is considered necessary, why a more incremental approach with formal review points has not been preferred, and how adaptive management would operate if ecological or socio-economic impacts proved greater than anticipated. Without a clear explanation, there is a risk that the proposal will appear to local communities and land managers to be something being advanced irrespective of unresolved consequences, rather than a genuinely precautionary and adaptable plan capable of responding to evidence as it emerges.

That concern is strengthened by the fuller population viability analysis. While the project summary presents 66 birds over five years as the minimum needed for long-term confidence, the full PVA explains that 56 birds over five years under a low-loss combined scenario still produced an extinction probability of 13.9%, recommends further modelling to determine what increase above 56 would be needed to reduce extinction risk below 10%, and states that a second phase of releases may also need to be considered. In our view, that means the scale, duration and intensity of the intervention are less settled than the consultation material may imply, and that consultees should not be asked to treat the present release proposal as though it were already a closed and fully justified design.

7.11 Other ecological risks, including impacts on sensitive bird species

We also have concerns about the potential implications for other sensitive bird species, not only hen harriers. The project's own pre-feasibility work recognises that reintroduced white-tailed eagles could affect avian species of conservation concern through both direct predation and disturbance at

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roost and nest sites, and states that a literature-based risk assessment was undertaken for species of national or international importance and for red-listed species whose Cumbrian distribution overlaps with suitable white-tailed eagle habitat. In our view, that makes it important that the project assess explicitly, and publish its conclusions on, any potential effects not only on hen harriers but also on other sensitive upland, wetland and coastal bird populations, including through predation, disturbance, displacement, or changes in habitat use, before any release proceeds.

7.12 Summary of main impacts

Overall, our view is that the main impacts would be:

- 1.** claimed ecological, educational and public-engagement benefits, together with possible tourism benefits, none of which should be overstated or treated as established local economic fact
- 2.** potential risks to the released birds themselves, including mortality, welfare, disease and biosecurity risks
- 3.** potential adverse effects on sheep farming interests in particular, together with wider risks and concerns affecting other rural land uses including game, wildfowl and some fisheries interests
- 4.** disturbance, access-management and nest-protection pressures in places where birds establish territories and attract public interest
- 5.** an uneven distribution of costs and benefits, with local burdens potentially falling on particular land managers or communities while claimed benefits are broader or more diffuse
- 6.** a significant need for ongoing monitoring, management, reporting, trust-building and conflict resolution if the project is to remain socially and practically sustainable
- 7.** potential effects on other sensitive bird species of conservation concern, not only hen harriers, which should be assessed explicitly before any release proceeds.

In summary, the consultation does not yet provide a sufficiently robust basis for concluding that the proposal's wider impacts are acceptable, manageable or fairly distributed. They include risks to the birds themselves, possible consequences for farming and other rural land uses, pressures on access and land management, and a continuing need for credible governance, monitoring and conflict resolution. The success or failure of any reintroduction would therefore depend not simply on whether white-tailed eagles can live in Cumbria, but on whether coexistence can be secured fairly, transparently and adaptively, with the confidence of those most directly affected.

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Q8. What considerations does your organisation feel should be addressed in the project planning process for any future white-tailed eagle reintroduction?

8.1 Assessment, mitigation and compensation

The Moorland Association considers that any future white-tailed eagle reintroduction should not proceed unless the project planning process first addresses a number of important matters in a clear, transparent and enforceable way. In particular, there should be a full assessment of likely impacts on sheep farming, sporting interests, fisheries interests and other rural land uses, including likely labour, management and reporting burdens as well as any direct losses. A credible conflict-management framework should be in place before any release, with clear arrangements for reporting, investigation, response and dispute resolution. The project should also set out in advance what mitigation, compensation or cost-sharing arrangements would apply, who would fund them, and how claims would be assessed.

Scottish experience also shows why that distinction matters in practice. NatureScot has confirmed that its Sea Eagle Management Scheme is focused on mitigation rather than compensation, and that it does not operate as a scheme for compensating each lamb said to have been taken. That is important because it illustrates that acknowledging impacts is not the same as making affected land managers whole. If the Cumbrian project intends to rely primarily on mitigation, management support or cost-sharing rather than full compensation, that policy choice should be stated plainly in advance, so consultees can judge the proposal on a clear and honest basis rather than on general assurances that support would somehow be available.

8.2 Evidential standards, verification and dispute resolution

In our view, that must go beyond broad assurances. Any such scheme should specify in advance the evidential standard for attributing losses, the reporting procedure and time limits, the process for independent verification, what categories of loss or management cost would be eligible, how decisions would be reviewed if disputed, and the timescale within which payments or support would be provided.

The Scottish precedent also highlights the risk of leaving evidential issues unresolved. Official material has stated that annual figures for the number of lambs predated are not held within the Scottish scheme, despite the long-running nature of that management framework. In our view, that is a warning against assuming that difficult questions of attribution, recording and verification will somehow resolve themselves over time. If the project is to proceed responsibly, those standards should be set in advance, including what evidence would be sufficient, who would verify it, what would be recorded, and how disputes would be determined.

The project's own livestock material acknowledges that it is difficult to determine how many live lambs are taken in Scotland, and also notes that the Scottish Sea Eagle Management Scheme provides management support that is expressly different from compensation payments. The distinction matters. If the project wishes to rely on mitigation or cost-sharing rather than full compensation, that policy choice should be stated clearly and transparently before any release is contemplated.

8.3 Monitoring, review points and essential project detail

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The planning process should also include a detailed post-release monitoring and management plan covering bird survival, movements, ecological effects, livestock interactions, socio-economic impacts and community attitudes, together with clarity on who will collect, analyse, report and fund that work over the long term. There should be clearly defined review points, thresholds and exit triggers so that adaptive management is meaningful in practice if impacts prove greater than anticipated. In addition, the project should provide proper detail on the donor population, disease risk and biosecurity, legal and regulatory compliance, release-site selection, visitor management and transboundary implications.

Release-site selection in particular should not be treated as a routine implementation matter. The pre-feasibility report describes the spatial modelling as exploratory, says that further refinement and sensitivity analysis are required, and notes that potential release sites had only been investigated on a preliminary basis and would need to be assessed further by reference to factors including disturbance and access agreements with landowners. The diet review also states that a potential release location in Cumbria should be carefully chosen to limit the risk of young birds becoming accustomed to sheep carrion and instead focus them on areas rich in wild prey. In our view, that makes release-site choice central to the project's likely risk profile, not a subsidiary detail that can safely be left vague at consultation stage.

In our view, these are not minor delivery details but essential preconditions for responsible decision-making.

8.4 Fairness, trust and representation in governance

More broadly, the planning process must address fairness and trust. Those most likely to bear the burdens of any reintroduction should have meaningful representation in project governance, and the proposal should not proceed on the basis that local risks and costs are acceptable simply because claimed benefits may arise elsewhere or in more diffuse ways.

That representation should be built into the design of the project from the outset, not added after headline support has already been established. The IUCN conflict guidance emphasises that processes which exclude or marginalise affected groups tend to deepen mistrust, harden resistance and produce less sustainable outcomes, even where decision-makers believe the substantive proposal is justified. In our view, that is directly relevant here. For a project likely to generate continuing practical burdens, governance must include those most affected not merely as consultees, but as participants in shaping mitigation, monitoring, review mechanisms and responses to conflict as they arise.

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Q9. Please add any additional comments.

9.1 Engagement with detail is not support in principle

The Moorland Association would add that this consultation should not be interpreted as support in principle for the proposal simply because consultees engage with questions of detail. In our view, substantial issues remain unresolved, and these go to the heart of whether any reintroduction could be justified, responsibly managed, or regarded as fair by those most likely to be affected.

9.2 The proposal must be judged by fairness and practicality, not ambition alone

More generally, the proposal should be assessed not only by reference to ecological ambition, but also by reference to practicality, proportionality, fairness and trust. In particular, the decision-making process should give proper weight to the fact that the likely burdens of any reintroduction (including risk, disruption, monitoring requirements, management complexity and potential cost) may fall heavily on a relatively small number of land managers and rural businesses, while any claimed benefits are uncertain or more widely diffused.

9.3 No release should proceed while key safeguards remain unresolved

We also consider that no release should proceed unless key matters are resolved in advance, including conflict-management arrangements, monitoring responsibilities, funding, governance, compensation or cost-sharing mechanisms where relevant, and clearly defined review points and exit triggers. These are not minor implementation details; they are central to whether the proposal is credible and acceptable.

Finally, a project of this kind cannot be regarded as legitimate if those most directly affected are expected simply to absorb the risks, burdens and uncertainty while key safeguards are deferred or left unclear. In our view, unresolved concerns on these matters should weigh heavily against any decision to proceed.

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