

|                                                                    | <p><b>Claim</b> - <i>Water vole displacements cost a lot of money!</i></p> <p><b>Fact</b> - Water vole displacements do add some additional costs to bank works but if MLC services are used, this is much less than some may think. It is most certainly an incalculable amount less than legal, financial and reputational costs if criminal proceedings were progressed in relation to a water vole offence under the Wildlife &amp; Countryside Act 1981.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
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| 1.                                                                 | <table border="1"> <tr> <th colspan="2">Approx. cost of bank repair per 150m (no water voles):</th></tr> <tr> <td>£4,680 – 5,140</td><td>£31-34 per metre</td></tr> <tr> <th colspan="2">Additional cost of MLC-progressed water vole displacement per 150m</th></tr> <tr> <td>£2,110 - £2,260</td><td>£14-15 per metre</td></tr> <tr> <th colspan="2">Cost of using external consultants for displacement per 150m</th></tr> <tr> <td>£4,810 - £9,810</td><td>£32-65 per metre</td></tr> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Approx. cost of bank repair per 150m (no water voles): |  | £4,680 – 5,140 | £31-34 per metre | Additional cost of MLC-progressed water vole displacement per 150m |  | £2,110 - £2,260 | £14-15 per metre | Cost of using external consultants for displacement per 150m |  | £4,810 - £9,810 | £32-65 per metre |
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| £4,680 – 5,140                                                     | £31-34 per metre                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
| Additional cost of MLC-progressed water vole displacement per 150m |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
| £2,110 - £2,260                                                    | £14-15 per metre                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
| Cost of using external consultants for displacement per 150m       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
| £4,810 - £9,810                                                    | £32-65 per metre                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
| 2.                                                                 | <p><b>Claim</b> – <i>Other IDBs and RMAs and farmers etc. just get on with bank work without surveying for or displacing water voles and they aren't getting into trouble.</i></p> <p><b>Fact</b> – Other IDBs and RMAs do displace water voles under licence before bank works as our ecologists have worked with them to do so. Where bank works take place without water vole displacements, it is likely that no water vole have been found in the works area to displace. There are also an increasing number of investigations and prosecutions where water vole offences have been committed in areas of bank works.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
| 3.                                                                 | <p><b>Claim</b> – <i>If you are undertaking flood risk management work, you are exempt from needing to displace water voles as you are keeping land and property safe from flooding.</i></p> <p><b>Fact</b> – Protected species legislation is law and no-one is exempt so routine and regular bank works must be undertaken compliantly. Urgent has a different legal meaning to emergency. Urgent works are those that require prompt action to resolve an expected but not imminent threat to public health and safety such as a bank slip. It is not likely that a repairing a bank slip after harvest to avoid damaging crops, that had originally occurred months previously will be seen legally as either an emergency or urgent works because sufficient time would have passed to allow for the works to be planned compliantly with a displacement if necessary. An emergency would be where an unexpected event requires immediate works to prevent or alleviate a significant threat to public health and safety, such as the sudden collapse of a bank and flood water threatening surrounding residential or developed areas. In an emergency it may be necessary to fix the problem first but be confident that you can provide evidence of threat to public health and safety to the Regulator as soon as possible after the works, as is legally required. The emergency declaration must always be made in partnership with a range of professionals including an ecologist.</p> |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |
| 4.                                                                 | <p><b>Claim</b> – <i>You can't do any bank works or maintenance where there are water voles anymore.</i></p> <p><b>Fact</b> – There are safe standard operating procedures that allow routine work such as desilting and flail mowing to be undertaken compliantly where there are water voles which help to avoid or minimise the risk of committing an offence. Any invasive work that breaks ground on the bank toe or bank face should be informed by a water vole survey, undertaken in the right season, well before works begin. For small areas of impact, for example a field drain or headwall installation, of a metre or so wide, it may be possible to reposition the works away from burrows under ecological supervision so a licenced displacement is not required. For longer lengths of bank impacts such as culvert installation or bank</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                        |  |                |                  |                                                                    |  |                 |                  |                                                              |  |                 |                  |

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|                                                                                                                                                        | reprofile or repair, if a survey showed that water voles were present a displacement under licence would be required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 5.                                                                                                                                                     | <p><b>Claim</b> - <i>You can get rid of water voles to avoid the need for a displacement if you flail all the banks and marginal vegetation before a survey or dewater a channel.</i></p> <p><b>Fact</b> – Dewatering a channel where water voles were known to be present is a licensable activity could be classed as an offence if it were not for specific and very short-term purposes or where a survey had not taken place to determine their presence or absence. Cutting bankside vegetation alone would be unlikely to displace water voles but could be classed as an offence if it damaged burrows or disturbed water voles in their burrows.</p>                                                       |
| 6.                                                                                                                                                     | <p><b>Claim</b> – <i>If you fix a bank slip straight away it is unlikely to require a water vole displacement.</i></p> <p><b>Fact</b> – A survey would still be needed but it is likely that water vole burrows would have been destroyed or damaged during the slip in many cases and they may have therefore left the damaged areas. If the survey proved this to be the case, then the slip could be repaired as usual without the need for a licenced displacement.</p>                                                                                                                                                                                                                                         |
| 7.                                                                                                                                                     | <p><b>Claim</b> – <i>Water voles are still in our ditches and we have done bank works before without displacing them so it can't bother them that much.</i></p> <p><b>Fact</b> – Regardless of this, damaging water vole burrows or disturbing them in their burrows is unlawful and carries a custodial sentence and/or a fine if found guilty. The law is based on huge volumes of scientific evidence which demonstrates that habitat damage and loss is a key factor in the drastic decline in water vole populations. The displacement approaches are shown to conserve and enhance water vole populations.</p>                                                                                                |
| 8.                                                                                                                                                     | <p><b>Claim</b> - <i>You can only repair one 150m length of bank where there are water voles.</i></p> <p><b>Fact</b> - The IDB water vole licence states that you can only legally displace from 150m at a time when you are displacing from both banks. You have to leave a 150m bank length for refuge in-between repaired sections. If only one bank is being repaired, theoretically you could displace from an unlimited length but only if an ecologist calculated that the opposite and adjacent habitat was suitable to take an increased number of water vole from the impacted area, which in most cases is unlikely. The usual maximum licensable displacement length for IDBs in all cases is 150m.</p> |
| 9.                                                                                                                                                     | <p><b>Claim</b> – <i>You can only displace water voles during a few specific weeks of the year.</i></p> <p><b>Fact</b> – This is true as licenced displacements during these weeks are shown to impact the water vole population the least and it avoids their dormant and breeding seasons. Displacement licence periods are from 15<sup>th</sup> Feb-15<sup>th</sup> April or 15<sup>th</sup> Sept to 31<sup>st</sup> Oct. Best practice sets the survey period between April to Sept as they are dormant during winter, but this can be flexible somewhat depending on the weather.</p>                                                                                                                          |
| 10.                                                                                                                                                    | <p><b>Claim</b> – <i>It is best not to tell anyone that you have water voles as they can stop you doing the work that you want to do, and don't allow surveys</i></p> <p><b>Fact</b> – It is assumed that water voles are everywhere in IDB ditches and drains so a survey would always be required ahead of any invasive works. Demonstrating transparency and competence in supporting biodiversity is likely to be attractive to potential funding partners and sources whereas having a lack of biodiversity data and evidence or being evasive can be conspicuous and can attract scrutiny.</p>                                                                                                                |
| <p><b>NOTE! Water Vole displacement are only needed where there are water voles! If a survey shows they are not, then bank works can go ahead.</b></p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |