



NABU-Bundesgeschäftsstelle · Charitéstraße 3 · 10117 Berlin

Minister Élisabeth Borne,
Ministre de la Transition écologique et solidaire
Hôtel de Roquelaure
246 Boulevard Saint-Germain

75700 Paris France

Subject: French government authorisation of unsustainable hunting of protected migratory species

Dear Minister Borne,

I am writing to you to express our deep concern over the unsustainable, and in our view unlawful, hunting of threatened and vulnerable bird species in France. This is in response to a public consultation your Ministry has opened on the setting of hunting quotas for Eurasian Curlew (*Numenius arquata*), European Turtle dove (*Streptopelia turtur*) and Black-tailed Godwit (*Limosa limosa*).

The hunting quotas suggested by your consultation are not in line with your own government body's scientific advice, and they are clearly not compatible with efforts to recover the species into a favourable conservation status and would, in our expert opinion, constitute a violation of the EU Birds Directive.

Naturschutzbund Deutschland NABU e.V. (BirdLife Germany) is involved with conservation and recovery projects especially on Eurasian Curlews and Black-tailed Godwit breeding in Northern Germany. These projects are proportionally funded by membership fees, tax payments and European funds of the LIFE-programme. Numerous enthusiastic volunteers are involved in protecting the last remaining breeding pairs and in restoring favourable breeding conditions.

We thus urge the French government to take up responsibility to prevent that all these efforts will be to no avail.

We thus ask you to follow EU law and scientific evidence and to ensure full protection of Eurasian Curlew and Black-tailed Godwit by:

- I. Set a zero quota for hunting Eurasian Curlew, in line with the recommendation of the French expert committee expressed in its Opinion (<http://www.oncfs.gouv.fr/IMG/pdf/gestion-adaptative/Avis-CEGA-Courlis-cendre.pdf>) to the Minister of the Ecological and Solidary Transition: to “not authorize any curlew harvest throughout the national territory, including the maritime public domain, until some significant knowledge gaps and related uncertainties linked to available data on the demography of the species, the spatial distribution of populations and hunting practices were not filled.” The suggested quota of 6,000 birds is not based on any science at all and would jeopardise conservation efforts in other countries, including some where the species is on the brink of extinction.

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- II. We strongly support, on the other hand, the proposal to maintain in place the moratorium on hunting of the Black-tailed godwit, but believe this should be set for 3, rather than 1, years in order to allow space for intensive ongoing conservation efforts, including the implementation of the EU lowland grassland breeding waders action plan that aims to restore breeding habitats and productivity.

For European Turtle Dove, we request you to

- III. Declare an immediate moratorium on hunting of European Turtle dove, in line with the EU Action Plan for the species. While France has expressed its opposition to the Action Plan, its own adaptive harvest committee came to exactly the same conclusion (<http://www.oncfs.gouv.fr/IMG/pdf/gestion-adaptative/Avis-CEGA-Tourterelle-des-bois.pdf>). Allowing the shooting of 30 000 birds of this rapidly declining species, thus speeding its probably extinction along the relevant flyway would represent a gross violation of French EU legal obligations.

We also urge you to

- IV. Immediately withdraw all exceptions allowing the widespread use of non-selective methods to hunt birds banned under the EU Birds Directive including the following that are currently under public consultation:
- Bow traps - "Tenderies" in NE France targeting Eurasian Lapwing/Golden Plovers & Thrushes/Blackbirds: http://www.consultations-publiques.developpement-durable.gouv.fr/projets-d-arrete-relatif-a-la-capture-des-vanneaux-a2013.html?id_rubrique=2
 - Lime-sticks Glue - "Gluaux" in SE France for Thrushes/Blackbirds: http://www.consultations-publiques.developpement-durable.gouv.fr/projet-d-arrete-relatif-a-l-emploi-des-gluaux-pour-a2012.html?id_rubrique=2
 - Net traps and Snap Net Trap - "Pantes Matoes" in SW France for Eurasian Skylark: http://www.consultations-publiques.developpement-durable.gouv.fr/projet-d-arrete-relatif-a-la-capture-de-l-alouette-a2011.html?id_rubrique=2

All of the above are clearly incompatible with EU law. The European Commission has already taken legal action against a number of Member States authorising such methods in the past and we expect France to face the same consequences.

- V. To refrain from authorising the destruction of 50283 Great Cormorant (*Phalacrocorax carbo sinensis*) per year for 2019-2022: http://www.consultations-publiques.developpement-durable.gouv.fr/projet-d-arrete-fixant-les-quotas-departementaux-a2010.html?id_rubrique=2 While article 9 of the Birds Directive does allow for lethal control under certain strict conditions, it is very clear that these conditions are not met by the proposed authorisation. Hence, such an authorisation would be unlawful.

President Macron has made the conservation of biodiversity one of his international priorities. He wishes to present France as a pioneer and flagship for ecological transition. However, all the above contradicts this ambitious and applaudable undertaking. The German nature conservation public finds it impossible to



understand how such an advanced mission can be reconciled with the systematic violation of international law allowing to damage biodiversity. We ask you to act responsibly for future generations to be able to enjoy nature as we know it.

Yours sincerely,

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