

Open letter

Brussels, 28/06/2021

Dear President of the European Commission,
Mrs. Ursula von der Leyen,

Dear Commissioner for the Environment, Oceans and Fisheries,
Mr. Virginijus Sinkevičius,

We are writing to you regarding the European Commission's approach to Turtle Dove conservation in Europe, and the recent work on adaptive harvest management, funded and chaired by the European Commission.

First, we are aware and supportive of the need to actively conserve the Turtle Dove, which is listed as *Near Threatened* at EU level and *Vulnerable* under the IUCN Red List at Global Level. We also agree that adaptive harvest management (AHM) is an important tool for the conservation and management of huntable birds when correctly applied. There is already good experience of AHM in Europe for geese.

With respect to sustainable hunting, it is important to highlight that the level of harvest has reduced considerably in the past three years in particular in France, Spain, Italy and Portugal in response to the EU/CMS Turtle Dove species action plan (2018). We also recognise that the countries, which allow hunting of Turtle Dove hold the largest and most widespread distribution of the populations of the species in Europe, and that hunters in these countries invest considerable resources including significant funding into habitat conservation, monitoring, and supplementary food and water provision.

In this context, we wish to express our disappointment at the pre-emptive and intransigent position taken by the European Commission to introduce a moratorium on the hunting of the species, even though this was rejected by the 10 countries that permit hunting for the species during the ratification of the (non-binding) international action plan for the Turtle Dove (2018).

We are also concerned that the European Commission continues to push its approach to call for zero harvest of the species in the AHM process, in particular for the western flyway. This approach is not in line with the principles of AHM, nor does it respect the subsidiarity principle, which applies to decisions about hunting under the Birds Directive.

Further, we are disappointed with the infringement taken by the European Commission against France and Spain. Both countries have achieved considerably better outcomes in terms of population trends and distribution for Turtle Dove compared to other Member States.

In this context, we urge the European Commission to shift its current position and understand that the maintenance of a heavily restricted and monitored harvest for the species is compatible with the

recovery of the Turtle Dove population. We are concerned that any moratorium will lead to significant reductions in the positive conservation efforts done by hunters, which finance and implement many of the conservation projects in the western flyway countries and implement the majority of the objectives listed in the international action plan for the Turtle Dove (2018).

Yours sincerely,

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