



Greenland White-fronted Goose Study

As from:

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27th March 2015

Dear Dr Bilsborough

Protection of Greenland White-fronted Geese from hunting in Wales

Thank you for your letter of 4 March 2015 regarding the protection of the Greenland White-fronted Goose from hunting in Wales by a change to current legislation.

In your letter, you state "...a statutory prohibition on the shooting of GWfG in Wales is not necessarily required to meet the...the 5 top priority actions contained within the AEWA Species Action Plan for GWfG". However, you quote "Step 3.1 in the Framework for Action reads *Introduce and/or maintain protection from hunting throughout the year (and critically during the crucial spring migration and pre-breeding period) whilst the population has its currently unfavourable conservation status.*" The current view of the Welsh Government is that the voluntary moratorium on shooting in Wales "meets this action".

You will no doubt be aware that this year there have been just 26 Greenland White-fronted Geese on the Dyfi Estuary. This is the lowest count ever, running back to 1959 when regular counts began and far lower than the previous minimum of 36 geese in 1975. I have no doubt that so long as those birds remain within the boundaries of the Dyfi National Nature Reserve they are more or less protected from shooting because of the voluntary moratorium imposed by the only shooting club permitted to hunt on the reserve. However, I can only repeat that the voluntary moratorium by hunting clubs ONLY holds for hunting club members, and this membership represents a tiny proportion of the vast majority of shotgun licence holders who have every right under the law to go out and shoot Greenland White-fronted Geese without any recourse under the law. This makes a mockery of the statutory protection granted by the governments of Iceland (where the species was an extremely popular quarry) and Greenland (where subsistence hunters also sacrificed one of their relatively few quarry species) in 2006. These states have given up their statutory right to hunt species on their territories (both of which support the entire world population at different times of their respective hunting seasons) whilst Wales permits its inhabitants to completely legally hunt the remaining 26 geese that return annually to her territories. You will doubtless be aware that 17 Greenland White-fronted Geese (including at least 6 first winter birds) turned up on Malltraeth Marshes in January of this year and they too would have been "fair game" in the sense that anyone with a shot gun licence and permission to hunt on the land could have gone out and shot every one of these geese without redress for this loss.

Following on from the quote in your letter, I would be extremely grateful for documentary evidence that "...all wildfowling clubs across Wales have committed to a similar voluntary moratorium...", providing the names of the clubs, the size of their membership and evidence of dissemination of the moratorium to their members. In that connection, I would also be grateful for your assessment of the proportion of

shotgun licence holders that are members of these wildfowling clubs to determine what proportion of legitimate hunters are likely to be subject of the voluntary moratorium.

It is not the case that a non-statutory hunting ban constitutes protection that is equivalent to statutory protection in any way. It does not. A voluntary ban will only ever be upheld by those who implement and are party to the ban, no matter how well intentioned on all sides. We are inordinately grateful to the Dyfi wildfowling all those years ago for implementing for a local ban on the Dyfi and for latterly encouraging a more widespread moratorium. These actions were insightful and inspirational and this long-standing contribution has undoubtedly had a very major beneficial effect on the survival of the population there to the present day. However, as long as there is no statutory ban on the hunting of the species in Wales, the ignorant, and strong willed and downright mischievous will continue to enjoy the absolute right under the rule of law to go out and shoot individuals out of a Welsh wintering population that now teeters on the very brink of extinction.

The state has an obligation to protect its common natural resources from the desires and plundering of the minority. This is the very essence of a civilised society that respects that features of the natural environment are more precious to the long-term benefit of society as a whole than to the individual in the short term. There is therefore an unassailable argument that the law should set the moral framework for the management of its natural treasures, especially when this particular resource has been the subject of internationally agreed legislative hunting protection throughout its entire range, with the very notable exception of England and Wales. This seems all the more significant given the far greater sacrifices made by other states in the flyway to safeguard the future of this threatened population.

You mention the 20,000 global population size alert threshold in the AEWA Species Action Plan which requires signatory parties to reconvene to consider responses when the total numbers fall below this threshold population size. I regret that we shall not be in a position to provide an assessment of the current level of global abundance as of this spring until later in the summer when we collate the totals from the responsible monitoring groups and agencies in Ireland, Scotland, Wales and England, but we already know the Welsh population is even lower again this winter than last, that breeding success was again generally well below average for the last 30 years and that numbers at many localities are below those of this time last year. Hence, we regrettably look forward to the very real prospect of breaking the 20,000 barrier in the very near future. All the more reason to implement legislative actions that guarantees the legal imperative that removes all sources of avoidable mortality through hunting in the Principality.

Thank you for your continued attention. Please do not hesitate to get in touch if you require further information

Yours sincerely



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