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Dear Sir/Madam,

Subject: Parliamentary resolution proposal 49: Leyfi til veiða á álf, grágæs, heiðagæs og helsingja utan hefðbundins veiðitíma (parliamentary resolution on hunting permits for swans, greylag geese, pink-footed geese and barnacle geese outside normal hunting periods).

The Wildfowl & Wetlands Trust (WWT) is an international NGO working to conserve wetlands and their biodiversity. We have a long and distinguished history of successful waterbird conservation, including for a number of goose and swan populations that migrate between Iceland and the United Kingdom.

WWT recognises that goose and swan grazing can cause economic impacts to farmers and that the arising conflict needs considered multi-stakeholder management. This is the premise behind the establishment of the European Goose Management Platform (EGMP), under the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA), to which Iceland and the United Kingdom are both Party. The EGMP has adopted, and exemplified the benefits of, a flyway-scale, multi-stakeholder approach to the management of goose-agriculture conflict, providing an international best practice framework for the sustainable management and conservation of these shared migratory waterbird populations. WWT strongly supports this approach and the EGMP, and believes all AEWA Parties should uphold these principles.

For the taking of birds from AEWA-listed populations to be consistent with the Agreement, it must be based on the best available knowledge of their ecology, be sustainable, and not hinder the maintenance or restoration of the population's favourable conservation status¹. It is clear from AEWA's legal text that a populations' full geographic range must be taken into account when ensuring that taking is sustainable². In addition, the taking of birds from AEWA Column A populations is prohibited unless specified conditions for exemption are satisfied³ and Parties are required to prohibit the taking of birds belonging to Column B populations "*during their various stages of reproduction and rearing and during their return to their breeding grounds if the taking has an unfavourable impact on the conservation status of the population concerned*"⁴. If

¹ See AEWA Agreement text, articles II(1) and III(2)(b).

² See AEWA's fifth preambular paragraph; and AEWA Action Plan, paragraph 4.1.1.

³ See AEWA Action Plan, paragraphs 2.1.1. and 2.1.3.

⁴ See AEWA Action Plan, paragraph 2.1.2. (a).



there are not sufficient data to determine whether taking during this period will have an unfavourable impact, then taking should be prohibited in accordance with the precautionary principle⁵.

The EGMP approach includes the need for management measures to be proportionate to the damage incurred (which therefore should be measured), and for lethal control to be a last resort to be used only once it can be demonstrated that no other satisfactory non-lethal solutions exist. Further, population management of shared migratory populations should be undertaken collaboratively⁶ with other flyway range states (not least in order to avoid the 'tragedy of the commons').

Given this framework, WWT is concerned with a number of aspects of parliamentary resolution proposal 49 to extend the shooting seasons in Iceland for geese and Whooper Swan. Our interpretation of this proposal suggests that, if implemented, Iceland would be at risk of non-compliance with several requirements under AEWA.

Of greatest concern to WWT is that the proposed approach does not take into account the requirements under AEWA to ensure the sustainability of the take/harvest at a population scale⁷. Rather, the proposal 49 appears to be based upon an assumption that any future increase in harvest will be sustainable simply because the relevant populations are currently increasing⁸. Specifically, there are currently no plans for the flyway-scale management or conservation of Icelandic Greylag Goose or Whooper Swan (both currently AEWA category B1 populations), as is necessary to ensure the harvest is maintained at a sustainable level and does not jeopardise their favourable conservation status. In addition, there are no proposals for how deficiencies in current population monitoring (necessary for assessing the sustainability of harvest) will be addressed; this is particularly important for Icelandic Greylag Goose.

An adaptive flyway management programme for Greenland Barnacle Goose is under development, within the framework of the AEWA International Single Species Management Plan for the Barnacle Goose. Given this, WWT believes it is premature to initiate significant new lethal control until this has been considered within the broader management plan for this population.

⁵ See AEWA Conservation Guidelines No. 5, *Guidelines on Sustainable Harvest of Migratory Waterbirds*.

⁶ See AEWA Action Plan, paragraphs 4.3.3. and 4.3.4.

⁷ See AEWA Action Plan, paragraphs 2.1.2. and 2.1.3.

⁸ See below – Icelandic Greylag Goose is now in rapid short-term decline and proposed for category A3e



Furthermore, shooting of these species in the breeding season, when birds are preparing to breed or may have young, also contravenes AEWA requirements unless it can be demonstrated that these measures do not have an unfavourable impact on the status of the population concerned⁹. Such practice is also widely accepted as unethical due to the disproportionately large impact on the population due to depressed breeding success that is in addition to the direct mortality.

Whilst AEWA provides for exemptions to prevent serious damage to crops, these exemptions “*shall be precise as to content and limited in space and time and shall not operate to the detriment of the populations listed in Table 1*”. WWT believes that neither of these conditions will be met as the proposal 49 is not sufficiently limited in space and time and there is no evidence to demonstrate that it will not have a detrimental impact on the population. Furthermore, AEWA Resolution 7.8 sets out that the cumulative effect of all exemptions across the population’s flyway should be taken into account¹⁰. WWT believes that the proposal 49 also does not meet this requirement as no intention to manage these shared populations at a flyway-scale (other than the existing EGMP process for Greenland Barnacle Goose) has been set out. Coordination through the EGMP would be the most practicable and effective way of achieving this. Of particular concern is the Icelandic population of Greylag Goose, which has undergone a significant recent decline¹¹.

In summary, WWT believes that Iceland should exercise caution at this time and not proceed with proposal 49 until it can fully meet the requirements of Parties to AEWA and maintain the favourable conservation status of these shared migratory waterbird populations.

Yours faithfully,

Tomos Avent

Head of International Programmes

⁹ AEWA 2.1.2. (a) states that Parties shall “*prohibit the taking of birds belonging to the populations concerned during their various stages of reproduction and rearing and during their return to their breeding grounds if the taking has an unfavourable impact on the conservation status of the population concerned;*”

¹⁰ See pages 7-8 of the Guidance on Satisfying the Conditions of Paragraph 2.1.3. of the AEWA Action Plan: https://www.unep-aewa.org/sites/default/files/document/aewa_mop7_32_%20para_2_1_3_aewa_ap_%20guidance_en_1.pdf
See <https://monitoring.wwt.org.uk/our-work/goose-swan-monitoring-programme/species-accounts/iceland-greylag-goose/>