



Ministre Élisabeth Borne
Ministre de la Transition Écologique et Solidaire
Hôtel de Roquelaure
246 Boulevard Saint-Germain
75700 Paris
France

24th July 2019

Madame la Ministre,

I write on behalf of the Wildfowl & Wetlands Trust (WWT), an international wetland conservation organisation, in response to the consultation on the proposal for hunting of Eurasian Curlew *Numenius arquata* in France.

WWT believes that there is no scientific basis for sustainable hunting of this species at the current time and we therefore urge the French government to introduce a full moratorium covering all regions and habitats in France.

Our reasons for this position are set out below:

Firstly, in response to the steep population declines across much of its European breeding range, all relevant Parties, including France, have adopted the African-Eurasian Migratory Waterbird Agreement's (AEWA) Single Species Action Plan for Eurasian Curlew. This commits Parties to not hunting Curlew until such time that an adaptive harvest management (AHM) system has been established in order to ensure that the harvest is sustainable and does not jeopardise other ongoing conservation actions. We understand that no such AHM system is yet in place and therefore strongly urge the French government to uphold its commitments under AEWA.

Furthermore, we note that the Comité d'Experts sur la Gestion Adaptative (CEGA) have advised that it is not currently possible to determine the level of a sustainable harvest in France and therefore the French government should not authorise any Eurasian Curlew harvest anywhere in the French territory, including the Maritime Public Domain, until significant knowledge gaps and related uncertainties linked to available data on the demography of the species, the spatial distribution of populations and hunting practices, have been addressed.

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Such a precautionary approach is entirely consistent with the listing of Eurasian Curlew as Near Threatened on the global IUCN Red List and as Vulnerable on the European and EU27 Red Lists , and commitments under the EU Birds Directive and Sustainable Hunting Initiative.

We also note that in response to the poor conservation status of Eurasian Curlew, conservation actions are now being undertaken in many countries throughout its European flyway. The seriousness being applied to Curlew conservation in many countries is exemplified by a summit on this issue held in July 2019 at 10 Downing Street, the UK Prime Minister's official residence. The summit reviewed the numerous conservation actions that are now ongoing in the UK to restore the breeding Curlew population, which is the third largest in Europe and the origin of some of the French wintering population.

Finally, we would also like to recognise that waterbird hunting is a legitimate activity with a strong tradition in France and that we respect the right for it to continue sustainably. In order to meet existing commitments for sustainable hunting we urge the French government to undertake meaningful dialogue with French hunting organisations and other stakeholders about the adaptations required to existing hunting practices in order to meet sustainability goals. We recognise that in many cases the declines of huntable species are caused primarily by factors other than hunting. However, we believe it is the responsibility of hunters to adapt to the new circumstances that they and their quarry face. The significant and growing threats facing global biodiversity means that hunting cannot continue to operate a business-as-usual approach. We welcome constructive dialogue on this issue and offer our full support in taking it forward.

Yours sincerely,

Dr. James Robinson
Director of Conservation

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