27/07/2020, Brussels

**RE: Adoption of FACE position papers at the online General Assembly, 7 September 2020**

Dear FACE Members,

At the online FACE General Assembly on 7 September 2020, Members will be requested to adopt three position papers, which were proposed by the Board:

1. A **new FACE position on bow hunting**, which was developed in conjunction with the FACE Legal Affairs Working Group and approved by the FACE Board on 6 November 2019. The position was circulated to all FACE Members in advance of the 2020 spring Members’ Meeting that was subsequently cancelled. See Annex I.
2. A **new FACE position on wolves in Europe**, which was developed in conjunction with the FACE Large Carnivore Working Group. On 23 June 2020, the Board agreed to approve the document with the addition of a section in red text on accountability for damages. See Annex II.
3. A **revised FACE position on lead in ammunition**, which was approved by the FACE Board on 23 June 2020 subject to a bilateral discussion between the FACE Nordic and Atlantic regions on selected text. This bilateral discussion concluded in July 2020. This position has been under development since November 2018 following discussions with the FACE Ammunition Working Group, the Board and Members. See Annex III.

**Adoption procedure:**

FACE Members are now encouraged to review these position and report back to the secretariat before 24 August 2020. **Please send any comments by email to** [**david.scallan@face.eu**](mailto:david.scallan@face.eu) **by 18:00 on 24 August 2020**.

Because the 2020 FACE General Assembly is an online meeting, it will be difficult to facilitate an open discussion on these position papers. In this context, please note that the secretariat will assume that a non-response from a FACE Member will mean the that the positions are acceptable for adoption.

Please note that FACE position papers can be adopted by consensus (without voting) or by voting if deemed necessary. An online voting mechanism will be available at the General Assembly. In accordance with Article 12 of the FACE Statutes:

* *Only Full Members having satisfied their subscription obligations will be allowed to vote.*
* *General Assembly decisions are reached by simple majority voting, the quorum being half the number of Full Members plus one.*

Yours sincerely,



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**Secretary General**

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**Annex I:**

**FACE Position on bow hunting**

**Recognising** that hunting with bow and arrow has a long and uninterrupted place in human culture and history;

**Acknowledging** that the EU Habitats Directive[[1]](#footnote-1), the EU Birds Directive[[2]](#footnote-2) and the Bern Convention[[3]](#footnote-3) do not prevent European countries from allowing the use of hunting with a bow and arrow and that this hunting method is explicitly recognised by the Council of Europe’s Charter on Hunting and Biodiversity;

**Further acknowledging** that a growing number of hunters are taking up bow hunting and that more European countries are introducing hunting with bow and arrow;

**Understanding** that using a bow restricts hunters to a much shorter distance to game/quarry, which creates a challenging approach where natural elements often play a bigger role;

**Further understanding** that the attributes of bow hunting can recruit new hunters that would otherwise decide not to join the hunting community;

**Recognising** that bow hunting is a sustainable form of hunting, which contributes to wildlife management, especially in (sub)urban areas, where bow hunting can form another safe alternative method to manage species;

**Acknowledging** that a hunter with training and proper equipment can place a hunting arrow with sufficient energy and penetration for a lethal shot;

**Taking into account** the evidence, which shows that bow hunting meets animal welfare standards while noting that further research would be welcome on the safety dimensions of bow hunting (e.g. ricochet possibilities);

**FACE and its Members, at its General Assembly on 7 September 2020, agree:**

* That bow hunting is complementary to hunting with a firearm with its own benefits and characteristics that comply with the respective game/quarry species;
* To invite national or regional authorities to introduce legal frameworks to allow and promote bow hunting;
* To promote bow hunting on the European and international level, where relevant.

**Annex II:**

**FACE Position on wolves in Europe**

### **Contribution of hunters to the successful conservation of wolves:**

Hunters have been and always will be key players in the conservation and management of wolves in Europe. To maintain viable and healthy wolf populations across the European countryside and to ensure lasting coexistence with rural communities, but also with other wildlife species, active population management among other measures is required. Further, it is essential to take into account the needs and interests of relevant stakeholders at the local level that share their everyday space with wolves during any decision-making. Member States must be able to actively manage of wolves in a way that permits wildlife conservation and other land use activities, including hunting and game management.

**Fundamental principles for successful management and conservation of wolves in Europe:**

* **Social acceptance:** For the successful conservation of wolves in Europe, it is more important to address the issue of their social acceptance rather than the purely ecological aspects. In most parts of Europe, wolves are not restricted by a lack of suitable habitat and prey species are abundant, due in part to the successful management efforts by hunters. The real challenge today is centred around the negative impacts of wolves on the rural way of life. Due to inadequate approaches to wolf management, which affect social acceptance of wolves, illegal killing/poaching could result in a greater threat to the long-term conservation of wolves in the future. To eliminate poaching and to increase social acceptance towards the presence of wolves in the European countryside, decision-makers and other relevant stakeholders must fully take into account the needs and interests including the anxiety experienced by some people living closest to wolves. There are various threats related to the presence of wolves adding to the existing pressures on rural livelihood interests, which must be factored into management decisions.
* **Active management:** One of the most effective ways to increase the social acceptance of wolves is to promote active and sustainable management of wolves. In Europe, the most successful examples of coexistence with wolves and other large carnivore species, such as brown bear and lynx are where active management through hunting is in place. Legal and sustainable hunting of populations will help reduce and prevent poaching if local communities are involved in and supportive of management processes. While the overarching legal framework concerning the management and conservation of many wolf populations is set at European level, implementation decisions should be set and taken at the local level and regional levels based on active management to increase the sense of empowerment and to reduce conflicts with those people who share the same areas as wolves.
* **Population-level/transboundary management:** The appropriate scale at which wolves should be managed is of great importance. The ranges of wolf populations can extend to tens of thousands of square kilometres and are inevitably divided by national or other administrative borders. FACE promotes a conservation status assessment at the population level and encourages transboundary and population-level management. Countries that have healthy wolf populations and a management framework that has proven over decades to be effective for both viable wolf populations and coexistence should not encounter any negative changes to their well-established management plan when engaging in transboundary or population-level management efforts.
* **Change of the legal status:** The legal protection status of wolves and other large carnivore species under the Habitats Directive should be amended as soon as their desired conservation status is reached. This means that certain wolf populations should be moved from Annex IV (strictly protected) to Annex V (protected but may be subject to management) as soon as their conservation status is favourable, and vice versa. In this context, FACE calls upon the European Commission and the Member States to ensure, as a matter of priority, the correct application of Article 19 of the Habitats Directive, which provides that the annexes shall be updated in accordance with technical and scientific progress, i.e. knowledge and understanding of expanding populations, newly developed behaviours of wolves, etc.
* **Accountability for damages:** There is diversity between countries in Europe with regard to the accountability for damages caused by huntable and non-huntable species. Since a change in the status of wolf as a huntable species could influence national liability situations, FACE stresses that hunters should in no case be responsible for the payment of damages caused by wolves.
* **Hunting/rural land use:** Hunting is one of the most important and oldest ways of sustainably using natural resources. It has always been an essential part of the cultures and traditions of rural communities. To preserve these lifestyles, traditions and local economies, hunting and game management must be possible. Wildlife conservation policies need to be pragmatic, long-term and easily understood. In some parts of Europe, densities of prey populations/ungulates are naturally low, or are kept low as a result of society’s need to limit damage to forestry, crops and to avoid traffic accidents, while in other parts numbers and densities are significantly higher. Wolf territories also vary in size between regions. FACE stresses therefore the need for a flexible wolf management, which is based on socio-economic and biological conditions on a regional and local level. This will allow hunters to continue to practice sustainable hunting of relevant game species, by using the unique and essential hunting cultures including hunting with free-ranging dogs. These rural activities support local social and economic (including food supply) needs and significantly contribute to maintain healthy biodiversity and a viable living countryside. Hunting is an important socio-economic and cultural activity in Europe’s rural areas. In some parts of Europe, the role of hunting is especially important where rural depopulation continues to be an issue.

### **FACE’s engagement:**

* FACE condemns any illegal killing of wolves.
* FACE stresses that any hunting of wolves should be conducted at sustainable levels, with view to ensuring the long-term conservation of the species.
* FACE promotes the importance of hunters in the conservation, management and monitoring of wolf populations across Europe, thereby contributing to the important collection of data on reproduction, distribution and density of wolves at regional and local levels. This facilitates their conservation, enhances coexistence and guarantees sustainable hunting of wolf populations.
* FACE will continue to constructively engage in the dialogue with other stakeholders on large carnivore conservation, including as a member of IUCN and of the EU platform on coexistence between people and large carnivores.
* FACE works as an evidence-based organisation and supports management decisions that are built on scientifically reliable data.

**Annex III:**

**FACE Position on the use of lead ammunition**

**Recognising the fact** that in most European countries, regulations banning the use of lead shot for hunting in wetlands have been introduced, or are close to being introduced;

**Acknowledging that** the evidence and the debate about lead ammunition is wider than waterbirds and wetlands, and that concerns encompass broader issues (e.g. safety, lethality, cost), which require close attention;

**Recalling that** FACE and its Members at the FACE General Assembly of 26 March 2010 in Brussels agreed to undertake to continue to call for the use of lead shot in wetlands to be eliminated as much as possible, particularly where there is a demonstrated risk and to make available information on suitable alternatives to lead shot;

**Acknowledging that** the phasing-out of lead shot over wetlands is in line with the principle of wise use, contributing to the conservation of wetlands;

**Considering that** nowadays suitable alternatives for lead ammunition are increasingly made available by the industry in line with the demand from hunters and other consumers and that FACE members should be informed by the industry about safe and effective ammunition accessible to the average European hunter’s budget;

**Stressing that** further work on non-lead ammunition is required to address the impacts on the environment, wildlife populations, lethality, user safety and safety to others, and all the implications and cost of the proposed transition;

**Recognising that** a total transition to non-lead shot, initiated over 20 years ago, has fully entered into force in two European countries with a more recent transition in a region of another country since 2004, but also recognising that the situation may pose technical and legal difficulties (e.g. due to CIP regulations) from one country to another;

**Taking into account** that the CIP regulations create a range of issues regarding the availability of satisfactory non-lead shot cartridges in a number of European countries;

**FACE and its Members at its General Assembly of 7 September 2020 agreed to call for the use of lead shot in wetlands to be phased out as much as possible taking into account the following concerns:**

* Measures should be related to and proportionate to the risk of lead poisoning of birds;
* The diversity and quantity of wetlands within European countries differs and that national regulations should be both practical and understandable for hunters and enforcement officers in line with national conditions;
* Any definition of wetlands must be identifiable in the field with minimum sizes set at national level, which excludes areas without water, such as dry peatlands or dry areas dominated by peat soils;
* Buffer zones create a wide range of legal problems and are not practical for hunters and enforcement officers;
* Current national laws do not ban the possession of lead shot when restricting the use of lead shot for hunting over wetlands and any restrictions on possession of lead shot are highly problematic and difficult to enforce.

**FACE and its Members at the FACE General Assembly 7 September 2020 further agree to:**

* Promote the exchange of information on this topic between FACE Members;
* Call upon the FACE Ammunition Working Group to provide sound advice to the FACE Board and FACE Members on issues relating to the use of lead and all projectiles in ammunition;
* Urge FACE Members to minimise the risks from the use of lead ammunition by following the guidance on [www.leadammunitionguidance.com](http://www.leadammunitionguidance.com);
* Call upon decision-makers and policy-makers within each Member State to monitor and report on the extent of the problems associated with lead ammunition and the implementation of the regulations in force within their territories on the use of ammunition by hunters;
* Request that the CIP regulations are reviewed to promote the availability of satisfactory steel shot cartridges;
* Call on FACE Members to undertake research into the impacts of all ammunition on wildlife populations, firearms, safety and lethality (which is important for animal welfare) as well as the costs of adapting/modifying firearms for hunters associated with a transition to non-lead ammunition;
* Demand a proportionate approach in the context of ‘Better Regulation’ to defined problems from the EU and from government authorities of the FACE membership.

1. Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora ([link](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043)), more specifically Annex VI of that Directive. [↑](#footnote-ref-1)
2. Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds, more specifically Annex IV of that Directive. [↑](#footnote-ref-2)
3. Convention on the Conservation of European Wildlife and Natural Habitats ([link](https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/104)), specifically Appendix IV of that Convention. [↑](#footnote-ref-3)