

The Relevant Official  
Office of Althingi  
Icelandic Parliament  
Reykjavík  
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16<sup>th</sup> March 2021

Dear Sir/Madam

**Subject: Comments from RSPB Scotland on a proposal for a parliamentary resolution on hunting permits for swans, greylag geese, pink-footed geese and barnacle geese outside normal hunting periods.**

RSPB Scotland is concerned at the *parliamentary motion for a resolution* currently under consideration – proposal 279 - which would allow the hunting of greylag, pink-footed and barnacle geese outside the normal open hunting season and during the birds' breeding season (specifically March 15 to June 15), and of whooper swans similarly through their breeding season (May 1 to October 1).

We acknowledge that grazing geese and swans can have significant impacts on agricultural land. Moreover, RSPB Scotland is not an anti-hunting organisation and is neutral on matters relating to hunting, except where the conservation status of target or other species is impacted. However, if the proposal currently being considered is adopted, we are concerned that:

- the proposed approach to management is not appropriate in the circumstances as described;
- may generate a damaging precedent;
- international consultation might not have been adequately pursued.

Firstly, we maintain that minimising agricultural damage is best done via targeted and controlled mechanisms, with lethal control as an option of last resort. This can be achieved under a system of licencing or other regulation that allows the impacts of shooting to be controlled and responsive to changes in the birds' status. Extending hunting seasons would, we believe, allow for insufficient control, and therefore could generate unintended impacts.

Second, we believe that the precedent set in terms of allowing hunting of a currently protected species (whooper swan), and allowing hunting during the breeding season, might lead to future decisions that weaken species protection more generally. Moreover, we see an extension of hunting into the breeding season runs contrary to the spirit of multiple laws and agreements regulating hunting around the world – as in the EU Birds Directive (transposed into UK legislation following Brexit), which is explicit that '*..hunting is forbidden when birds are at their most vulnerable: during their return migration to nesting areas, reproduction and the raising of their chicks*'. Whilst this does not apply to Iceland directly as law, we believe the principle remains valid and across territories.

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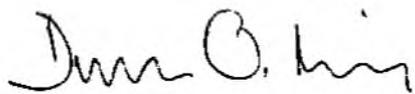
The RSPB is part of BirdLife International,  
a partnership of conservation organisations  
working to give nature a home around the world.

Third, we are concerned that the appropriate level of international consultation may not have been undertaken, specifically under the African-Eurasian Migratory Waterbird Agreement (AEWA). The approach under AEWA 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 collaboratively with other flyway range states.

At a recent meeting of the National Goose Forum in Scotland, we asked officials whether they were aware of the proposals before the Icelandic Parliament and were informed that they were not. Environmental policy is largely devolved to the Scottish Government, whilst the UK Government is the signatory to international treaties such as AEWA. In subsequent correspondence between Scottish and UK officials following our question at the NGF, it was not immediately evident that UK officials were aware of this specific proposal. Given the importance of Scotland as wintering grounds of the species involved, we are concerned that the AEWA principle of adopting an international flyway approach to the management of populations might not be followed. Noting the recent decline in Icelandic greylag geese, and the consequent prospect of new AEWA-generated controls on hunting that population in Scotland, we maintain that a fully consultative and cooperative flyway approach to management is required.

I hope these points can be taken into consideration when making final decisions on this matter.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Duncan Orr-Ewing', written in a cursive style.

Duncan Orr-Ewing  
Head of Species and Land Management  
RSPB Scotland