



**Mr Virginijus Sinkevičius**  
European Commissioner for the  
Environment, Oceans and Fisheries  
Environment Directorate,  
European Commission  
Rue de la Loi / Wetstraat 200,  
1049 Brussels, Belgium

12 April 2023

Dear Commissioner Sinkevičius,

**RE: Lifting of a moratorium on spring hunting of European Turtle Doves in Malta**

The IUCN Species Survival Commission Pigeon and Dove Specialist Group (PDSG) has been notified of the EU state of Malta's intent to allow spring hunting of European Turtle Doves (*Streptopelia turtur*), a species currently recognised as being Vulnerable to Extinction.

The IUCN Species Survival Commission (SSC) is a science-based network of volunteer experts from almost every country of the world, and is critical to the development of the IUCN Red List of Threatened Species. IUCN assesses the status of species using the Red List Categories and Criteria, which are the most widely accepted system for measuring extinction risk. The European Red List assessments have been carried out in collaboration with many individuals and organizations across the continent, with expert advice and assistance from SSC. Assessing species for the IUCN Red List of Threatened Species and the European Red List relies on scientists' collective knowledge in order to produce the most reliable estimates regarding the status of species.

In 2016, the IUCN drew the attention of former European Commissioner for Environment, Karmenu Vella, to ongoing spring hunting of European Turtle Doves in Malta, despite the species' up-listing to Vulnerable status. Following this, we understand that a moratorium was enacted in Malta to protect Turtle Doves during their pre-nuptial migration, thus ensuring that spring hunting in Malta would not contribute to the severe decline of the species.

The continued decline of the European Turtle Dove is cause for serious concern, and should motivate range states to exert all efforts to protect the species - from its wintering grounds to its breeding grounds, including its migratory route. To this regard we acknowledge the collective effort that has been expended at the Task Force on the Recovery of Birds within the EU's NADEG sub-expert group on the Nature Directives.

Expert reports tabled at the Task Force bear witness to a continued decline of the European Turtle Dove, as well as a reluctance by some states to adhere to zero-harvest recommendations intended to

give the species the best chance of recovery. Malta's decision in 2022 to lift the previous moratorium on spring hunting of Turtle Doves, permitting the harvest of 1,500 birds during the prenuptial migration, is an alarming development. We understand that Malta intends to open another hunting season in spring 2023 through the application of Article 9 (1) c of the Birds' Directive, allowing another 1,500 birds to be shot. This is despite the absence of any evidence of recovery that might warrant the species' up-listing to a more favourable status, and despite the Commission initiating infringement proceedings on the matter. The PDSG is firm in our view that the deliberate killing of any Turtle Doves at such a critical stage in their life cycle should be halted with immediate effect, so as to not compromise the EU's collective commitment to ensuring the recovery of this species.

We draw the attention to the Commission's Guide to Sustainable Hunting under the Birds Directive (European Commission, 2008), particularly its clause 3.5.40 which states that:

*Derogations should not be granted for species or populations with an unfavourable conservation status, which are declining within the European Union (or in a Member State considering exercising such derogations), whose area of distribution (breeding or wintering) is contracting, or with very low population levels, unless it can be clearly demonstrated that use of such derogations are beneficial to the conservation status of the species/population concerned.*

We therefore urge the Commission to immediately request that Malta protect the European Turtle Dove on its pre-nuptial migration and refrain from opening a hunting season in 2023, and in subsequent years, until the species has recovered sufficiently to warrant up-listing under IUCN Red List Criteria. Moreover, given the volatility of moratoria shown in past years, we also urge the Commission to ensure that the legal frameworks allowing the application of a derogation in Malta reflect the Commission's own guidance that derogations should not apply to species which are declining within the European Union. Such actions should be delivered in a timely fashion so as to prevent further unnecessary losses in this rapidly declining species.

Yours sincerely,



**Joe Wood**

Co-Chair, IUCN SSC Pigeon and Dove Specialist Group

CC: Ms Florinka Fink-Hooijer, Director-General, DG ENV, European Commission

Mr Ariel Brunner, Regional Director – BirdLife Europe and Central Asia