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21<sup>st</sup> November 2023

Dear Sir/Madam,

**Subject: Parliamentary resolution proposal 49: Leyfi til veiða á álf, grágæs, heiðagæs og helsingjau tan hefðbundins veiðitíma (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 49 - 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.

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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.

Firstly, we maintain that minimising agricultural damage is best done via targeted and controlled mechanisms, with lethal control of migratory species 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 capacity to regulate additive mortality, and therefore could generate unintended negative conservation 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 set difficult precedents in terms of species protection more generally. Moreover, we see an extension of hunting into the breeding season as 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.

Third, we are uncertain whether 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. We have not been involved in any discussions about the proposal before the Icelandic Parliament at the National Goose Forum in Scotland – as we would have expected had the Scottish Government been consulted. We asked officials whether they have been contacted by Icelandic colleagues in this regard, but have not yet received a response. Environmental policy is largely devolved to the Scottish Government, whilst the UK

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Government is the signatory to international treaties such as AEWA. 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 breeding 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,



Duncan Orr-Ewing

Head of Species and Land Management

RSPB Scotland

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