



THE VOICE OF EUROPEAN HUNTERS

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Open Letter to the UK Government on the Sustainable Management of Migratory Birds

Dear Secretary of State,

On behalf of FACE, the European Federation for Hunting and Conservation, representing 37 national hunting associations and over 7 million shooters across Europe, I am writing regarding the proposals to ban or reduce shooting seasons for 8 quarry species in England, Wales and Scotland.

This is a matter of significant concern not only for the UK shooting community, but also for the wider European framework for the conservation and sustainable management of migratory birds.

For the migratory species considered in your review, decisions on hunting seasons and species status must be based on flyway-level conservation assessments, not solely on national data. Where concerns do exist, they must be interpreted carefully and in their full ecological context.

For example, relying only on national data overlooks the fact that these birds belong to flyway populations, and their presence in the UK is strongly influenced by climatic conditions during winter migration. This is why internationally coordinated counts take place mid-January, as national trends alone do not show the real picture.

Over the past five years, the European Union has undertaken the most comprehensive assessment ever carried out on the sustainability of hunting migratory bird species, notably through the work of the European Commission's Task Force on the Recovery of Birds. This work confirmed an essential principle: for migratory birds, the correct ecological scale for decision-making is the flyway.

For the majority of species assessed, there was no indication of unsustainable hunting. Species such as Common Snipe and Coot were placed firmly in the "green" category, showing no evidence that hunting threatens their conservation status. Species such as Greater White-fronted Goose, Goldeneye, Woodcock, Woodpigeon and Golden Plover were not even subject to concern at EU level, as they were classified as having secure conservation status based on the most recent reporting data, including the period when the UK was still part of the EU.

This demonstrates that sustainable hunting governance is already functioning. The Birds Directive has, over decades, successfully regulated hunting across Europe, supported by stronger national measures where necessary. In many cases, hunting communities themselves have gone further through voluntary restraint and conservation-led self-regulation.

This is precisely what BASC has demonstrated in the UK through its science-led approach, practical habitat conservation, and species-specific Sustainable Shooting Code of Practice. Measures such as the voluntary moratorium on Pochard, limits on Pintail harvest, delayed shooting periods for Goldeneye and Woodcock, and robust bag data collection represent responsible, evidence-based management rather than blunt legislative prohibition.

Northern Pintail and Common Pochard have been highlighted for additional attention, but even here the wider evidence matters. Wintering population data from the International Waterbird Census show improving trends for Pintail and recent stabilisation and recovery for Pochard at flyway level. This is particularly important because that is when these birds are being harvested and for species that are more abundant and better monitored in winter, wintering population data should be central to management decisions.

The United Kingdom is a contracting party to the African-Eurasian Migratory Waterbird Agreement (AEWA) and remains bound by wider international conservation frameworks, including the Bern Convention. These agreements depend on coordinated, science-based decision-making across countries, not fragmented national restrictions that ignore broader population dynamics.

Removing species from the huntable list without properly considering flyway-level evidence risks undermining both conservation credibility and the practical conservation work delivered by hunters. Experience shows that simply removing a species from the huntable list does not automatically deliver conservation benefits, as habitat loss is often the main driver of population change rather than harvest itself.

It also risks sending the wrong signal: that responsible self-regulation, habitat investment and voluntary restraint are less valued than politically attractive prohibitions.

Hunters are among the most significant private investors in wetland and bird habitat conservation across Europe. FACE's Biodiversity Manifesto, which collates several hundred hunting related conservation projects around Europe, shows that 45% of hunters' habitat conservation initiatives focus on wetlands. Restricting sustainable hunting without sound scientific justification weakens the very incentives that help fund and maintain this work.

Good conservation decisions must be taken at the right ecological scale. For migratory birds, that means looking beyond the UK's shores.

FACE therefore makes two clear recommendations:

- For migratory birds, decisions on hunting sustainability must be based primarily on flyway-level wintering trends, not national trends alone. Without this approach, decision-making cannot be scientifically robust.
- Hunters are often best placed to manage their own activity responsibly. BASC consistently demonstrates this through the promotion and implementation of its Code of Good Shooting Practice. Constructive dialogue between hunters and decision-makers should be strengthened to deliver balanced outcomes, rather than imposing disproportionate restrictions with far-reaching consequences.

We therefore strongly urge the UK Government to ensure that any changes to the list of huntable species are based on full flyway-level scientific evidence, coordinated international obligations, and recognition of the positive role that sustainable hunting plays in conservation.

Evidence must guide policy—not perception.

Yours sincerely,

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