

Promoting the conservation of White-fronted Geese in Wales

Consultation Response Form

Section 1: About you

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Section 2: Your response

Please respond in the space below the relevant question. You may choose to respond to some or all of the questions.

Question: What evidence do you have concerning the shooting of GWfG in Wales?

Background

Two types of White-fronted Geese (WfG) (*Anser albifrons*) occur in the UK. The European race (now referred to as EWfG) (*Anser albifrons albifrons*) and the Greenland race (now referred to as GWfG) (*Anser albifrons flavirostris*). Prior to the 1981 Wildlife and Countryside Act, White-fronted geese were a quarry species that were typically shot in coastal areas by wildfowling across Great Britain.

International population status

The international coordinated count in spring 2015 found a combined global total of 18,854 GWfG. This is the lowest recorded census since spring 1985 and represents a 9.3% reduction since the last world population estimate of 20,797 in spring 2014 (Fox et al. 2015). The immediate cause of this rapid population decline is known to be chronic low productivity in Greenland, which over the last twenty years has not balanced mortality (Stroud et al. 2012). It is estimated that the UK holds about half the world's population of GWfG in winter with the rest over-wintering in Ireland (Fox et al. 2015). Whilst only small numbers of GWfG regularly over-winter in Wales, these birds are crucial to the maintenance of the national (and international) distributional range of the population.

International and national legal status

Greenland White-fronted Goose is listed on Annex 1 of the EU Birds Directive (2009/147/EEC) and is a qualifying feature of the Dyfi Estuary Special Protection Area (SPA).

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Internationally, the Greenland White-fronted Goose (GWfG) is legally protected from shooting throughout all Range States (Greenland, Iceland and Ireland) other than Wales and England. Additional mortality from shooting has been shown to adversely contribute to population decline (Stroud et al. 2012). Minimising additional sources of mortality (explicitly delivered in part by full legal protection) is a priority action in the international action plan in the African-Eurasian Waterbird Agreement (AEWA)¹, and a legal requirement for the UK following the listing of GWfG in Category 2* of Column A of AEWA's Action Plan (as revised at AEWA Meeting of the Parties 4 in 2008 workshop). Range States of a migratory waterbird species listed in Column A of the Action Plan shall endeavour:

- i) to conserve and, where feasible and appropriate, restore those habitats of the species which are of importance in removing the species from danger of extinction;
- ii) to prevent, remove, compensate for, or minimise, as appropriate, the adverse effects of activities or obstacles that seriously impede or prevent the migration of the species; and
- iii) to the extent feasible and appropriate, to prevent, reduce or control factors that are endangering or are likely to further endanger the species, including strictly controlling the introduction of, or controlling or eliminating, already introduced exotic species.

The asterisk against the Category 2 status refers to a provision in the AEWA Action Plan which states:

“By way of exception for those populations listed in Categories 2 and 3 in Column A only and which are marked by an asterisk, hunting may continue on a sustainable use basis where hunting of such populations is a long-established cultural practice. This sustainable use shall be conducted within the framework of special provisions of a species action plan at the appropriate international level.”

The international species action plan² adopted by AEWA Parties in 2012 states that:

“With low annual productivity it is critically important to reduce sources of mortality. This will conserve the very small numbers of successful breeders and produce subsequent generations and help restore the population to former levels. To this end, the workshop concluded that hunting cannot currently be undertaken on a sustainable basis and any kill would exacerbate the current unfavourable conservation status of the population.”

International and national conservation status

In the fourth review of the status of birds in the UK, GWfG was moved from the green to the red list of the birds of conservation concern (Eaton et al. 2015). In Wales, this species was also listed Section 42, a list used to guide decision-makers, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006 “to have regard” to the conservation of biodiversity in all their activities. The Greenland White-fronted Goose is

¹ The Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) is a regional agreement negotiated under and linked to the Convention on the Conservation of Migratory Species of Wild Animals (CMS). Governments adopting the Agreement formally recognise “*the need to take immediate action to stop the decline of migratory waterbird species*”.

² http://www.unep-aewa.org/sites/default/files/publication/ts45_issap_gwfg_2.pdf

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also classified as **Endangered** under the IUCN Red Data List criteria and is listed as a priority species under the UK's Biodiversity Action Plan.³

Evidence

In Wales, any person, outside the close season (1 February – 31 August), may lawfully kill Greenland White-fronted Geese. This includes person(s) affiliated to a wildfowling club. However, NRW note that there has been a voluntary ban on shooting GWfG by wildfowling clubs on the Dyfi Estuary since the 1970s and in Pembrokeshire and parts of north-west Wales on land over which wildfowling clubs have specific rights to shoot since 2013. However, under the current arrangement a voluntary moratorium only applies to:

- 1) members of the British Association for Shooting and Conservation (BASC) and Wildfowling Clubs.
- 2) restricted geographic areas of GWfG historic Welsh wintering range, and
- 3) only to GWfG and not to EWfG, creating the risk of accidental shooting of GWfG through misidentification with EWfG.

Bag returns in the 1990s from wildfowlers on Anglesey showed continued killing of GWfG (Figure 1), where 28 GWfG were recorded to have been shot between winters 1997/98 and 2002/03. These were birds either wintering on Anglesey or possibly birds on migration to the regularly occupied wintering site on the Dyfi Estuary SPA (where GWfG is a qualifying feature of the site).

Though NRW respects the integrity of BASC and wildfowling clubs, the absence of a statutory bag return makes the gathering and provision of evidence detailing how many GWfG have been shot in Wales (2003 - present) very challenging to collect and report.

³ <http://jncc.defra.gov.uk/page-6188>

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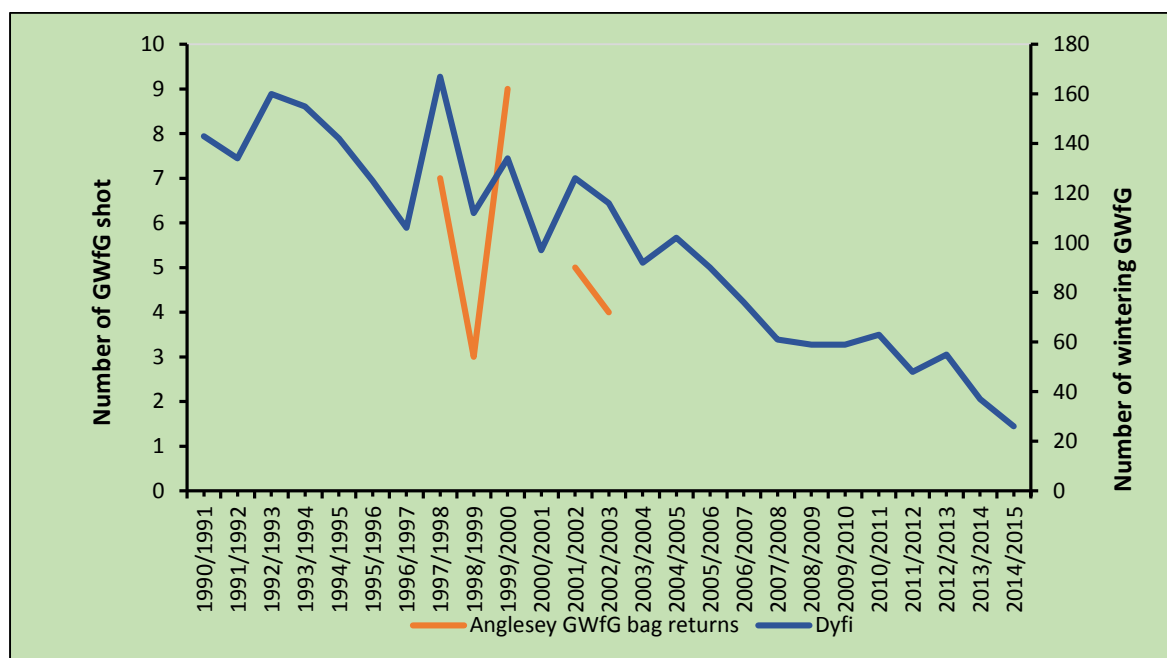


Fig. 1. Annual population estimates of Greenland White-fronted goose (GWfG) wintering on the Dyfi Estuary (blue) and numbers of GWfG known to have been shot at wintering areas on Anglesey (orange). Data sources: RSPB unpublished data (number of wintering GWfG) and Anglesey Wildfowlers unpublished bag return data (numbers of GWfG killed). Note, the geese on the bag return were recorded as WfG but due to the historic usage of Anglesey by GWfG not EWfG the geese shot were considered to be GWfG.

The AEWa Meeting of the Parties (MOP) 6⁴ (2015) stressed the importance of compliance with the legal obligations to protect populations (such as GWfG) listed in Column A of the Agreement's Action Plan:

“Urges Parties as a matter of high priority and urgency to ensure that their legislative lists of protected species are fully in conformity with the requirements of section 2.1 of the Agreement's Action Plan, such that where populations listed in Column A of Table 1 regularly occur within their territories they are subject to full legal protection or, when applicable, that harvesting is undertaken only in conformity with the recommendations of the respective International Species Action Plans established in application of paragraphs 2.1.1 and 2.2.2 of the AEWa Action Plan for Column A Category 2 and 3 populations marked with an asterisk and Column A Category 4 populations;”

Question: Do you support a statutory ban on the shooting of all WfG in Wales? If so, which is your preferred option (Options 1 or 2), and why? If not, why?

⁴ http://www.unep-aewa.org/sites/default/files/document/aewa_mop6_res4_cons_sust_use_mwb_en_0.docx

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Preference

NRW supports a statutory ban on the shooting of all WfG (EWfG and GWfG) throughout Wales throughout the year (Option 1).

Rationale

Wintering GWfG are endemic to the UK and Ireland. Small numbers of GWfG regularly over-winter in Wales on the Dyfi Estuary SPA (this site is the most southerly regular flock of wintering GWfG in UK) and these wintering birds are crucial to the maintenance of the national (and international) range of the species. GWfG is a qualifying feature for the SPA. The Dyfi Estuary SPA population of GWfG has declined by 83% between 1990 and 2014/15, representing a 3.5% annual decline (for numbers of GWfG see figure 1). A number of historical wintering sites in Wales have already been lost (Fox and Stroud 1986) and the evidence indicates that once sites are lost they are not reoccupied (Francis et al. 2011). In Scotland, considerable attention has been given to the smallest wintering sites to prevent further extinctions and contraction of range (Francis et al. 2011).

Studies at Wexford Slob, Ireland, showed that shooting mortality was additive to natural mortality, such that protection from shooting gave enhanced adult survival rates (Fox 2003). NRW supports the AEWA framework for action⁵, particularly the objective to “introduce and/or maintain protection from hunting throughout the year, whilst the population conservation status is listed as unfavourable.” With low annual productivity it is critically important to reduce sources of mortality. NRW notes, failure to take appropriate steps to reduce mortality i.e. hunting, is non-compliant with international and national conservation obligations.

The UK BAP clearly implies the requirement to “Remove White-fronted Goose from Schedule 2 part 1 of the Wildlife and Countryside Act in Wales”.⁶

The current situation in Wales is of a voluntary shooting ban of GWfG by Shooting Association and Wildfowling Club members within the Dyfi Estuary and recently, Pembrokeshire and north-west Wales. However, NRW remain concerned that any persons, holding specific shooting rights, may lawfully shoot GWfG. NRW considers the current approach is not a fully effective and appropriate conservation option to protect GWfG and to minimise additive mortality to a rapidly declining bird.

There are ‘in the field’ difficulties in distinguishing between the two races of WfG (Greenland White-fronted Goose and the European White-fronted Goose). Though EWfG and GWfG winter in geographically isolated areas, providing full protection to all WfG would reduce the risk of any accidental mortality to GWfG. This approach was successfully adopted in Scotland and Northern Ireland.

⁵ AEWA International Singles Species Action Plan for the conservation of Greenland White-fronted Goose, 2012, page 36-39.

⁶ <http://jncc.defra.gov.uk/speciespages/2041.pdf>

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NRW recognise that all Range State representatives must take joint and equal responsibility for the conservation of GWfG and consider that members of the farming, hunting and conservation organisations have a strong role in conserving this iconic, culturally-important and highly vulnerable bird.

With the Welsh Government's commitment to achieving the global and EU 2020 targets to halt biodiversity loss, NRW considers any action (in this case a statutory shooting ban of GWfG) that may help safeguard a rapidly declining species in Wales is important.

A statutory ban on the shooting of all WfG would be in line with international obligations under AEWA. This is further supported in the Single Species Action Plan adopted by AEWA (and the UK) specifying the requirement to give protection in Wales. The AEWA MOP 6, at which UK participated, adopted Guidance on Measures in National Legislation for Different Populations of the Same Species, Particularly with Respect to Hunting and Trade⁷. This clarifies policies to be adopted in situations, such as in Wales, where populations of different status occur. It states:

“In the circumstances where the overlap of populations is neither temporally limited nor spatially distinct, the legislation should be tailored to the population with the poorer conservation status (i.e. the population listed on a higher column in AEWA Table 1).”

MOP 6 also “Urges Parties to implement this guidance as a matter of priority and review the need for potential adjustments of their national legislation, and other relevant actions to reduce the risk of accidental shooting of protected waterbirds, after each MOP in accordance with this guidance;”⁸

Question: Do you support a statutory ban on the shooting of all GWfG in Wales? If so, which is your preferred option (Options 3 or 4), and why? If not, why?

Preference

NRW supports a statutory ban on the shooting of GWfG throughout Wales throughout the year (Option 3) for the reasons outlined in question 2. However, NRW's preference remains Option 1.

Rationale

It is widely recognised between ornithologists that there are ‘in the field’ difficulties in distinguishing between the two races of WfG (Greenland White-fronted goose and the

⁷ http://www.unep-aewa.org/sites/default/files/document/mop6_34_aewa_overlapping_pops_0.doc

⁸ http://www.unep-aewa.org/sites/default/files/document/aewa_mop6_res7_guidance_definitions_en.docx

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European White-fronted goose). Additional supporting text is provided in question 2 (point 4).

Note, additional points to support Option 3 are provided in the rationale for Option 1 (see question 2).

Question: Do you support the continuation of the current voluntary ban on shooting GWfG in Wales (Option 5)? If so, why? If not, why?

Preference

NRW does not support the continuation of the current voluntary ban on the shooting of GWfG in Wales (Option 5).

Rationale

GWfG are now legally protected from killing throughout its global range with the exception of Wales and England, which are the only two countries where hunting is still legal. Studies at Wexford Slobs, Ireland, showed that shooting mortality was additive to natural mortality, such that protection from shooting gave enhanced adult survival rates (Fox 2003). The Welsh population of wintering GWfG is declining at 3.5% per annum, and is forecasted to be extinct in Wales as a wintering species by 2020 in the absence of conservation intervention.

GWfG are highly site-loyal to wintering areas (Wilson et al. 1991) and demonstrate very traditional use of sites at all times of the year (Fox & Stroud, 2002). Once lost, sites that were historically used are not re-occupied (Stroud et al. 2012) and the loss of the Dyfi estuary population would result in further contraction of range (this site is the most southerly regular flock of wintering GWfG in the UK).

NRW recognise that the voluntary shooting ban on the Dyfi Estuary (since the 1970s) was instrumental in preventing the extinction of GWfG at this site when the population was at its lowest in the late 1970s. However, minimising additional sources of mortality (explicitly delivered in part by full legal protection) is a duty under the African-Eurasian Waterbird Agreement (AEWA).

Knowledge of the distribution and abundance of the GWfG population is robust, with internationally coordinated annual monitoring of all wintering areas in place since 1983. These are broadly summarised by Fox & Stroud (2002) and the GWfG Study 2014/15 annual report (Fox et al. 2015). The AEWA international species action plan requires the Range States to convene an emergency meeting if the population falls below a threshold of 20,000 individuals, in order to consider conservation measures. In spring 2015 the global population of GWfG is estimated to have fallen below 19,000 birds for the first time since 1985 (Fox et al. 2015). NRW are aware that arrangements for such a meeting of the Range States are in hand.

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Wales currently has in place a voluntary shooting ban of GWfG by Shooting Association and Wildfowling Club members within the Dyfi Estuary, and more recently, Pembrokeshire and north-west Wales. However, NRW remain concerned that any person, with the appropriate shooting rights, may lawfully continue to shoot GWfG outside the close season. NRW consider this approach (i.e. voluntary shooting ban of GWfG in restricted areas of Wales) is not an effective and appropriate conservation option to minimise additive mortality of GWfG and indeed is not compliant with international obligations.

As already noted, 'in the field' difficulties in distinguishing between the two races of WfG (Greenland White-fronted goose and the European White-fronted goose) create the risk of misidentification. There is clear AEWA guidance that where there are such look-alike situations affecting vulnerable species then shooting should be banned. A shooting ban would therefore need to include the European and Greenland races. Providing full protection to all WfG would reduce the risk of accidental mortality to GWfG. This approach has been successfully adopted in Scotland and Northern Ireland

Question: What priority should be given to a possible statutory ban (option 1 - 4) compared to possible other conservation measures, and why?

NRW welcomes the Welsh Government's consultation to seek views on different options to impose a statutory ban on the shooting of GWfG in Wales. To minimise mortality particularly through shooting, NRW considers a statutory ban on the shooting of GWfG throughout Wales a high priority. However, NRW promotes an alternative option, that of Option 1 Plus (statutory shooting ban + conservation research + habitat management measures + community engagement).

Rationale

All Range States (Greenland, Iceland, Ireland and UK with the exception of Wales and England) have taken measures to minimise additive mortality by introducing and maintaining protection from hunting throughout the year. NRW recognises that all Range State representatives must take joint and equal responsibility for the conservation of GWfG and agree that members of the farming, hunting and conservation organisations have a strong role in conserving this iconic, culturally important and highly vulnerable bird. NRW considers a statutory ban on shooting GWfG throughout Wales is a high priority to minimise additive mortality.

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Within species recovery frameworks it is widely accepted that all appropriate measures are applied to 1) halt population decline and 2) ensure sustainable recovery is met. The UK national report to AEWA MoP 6 stated⁹ that:

“A management plan for the population in Wales is under active development by the Welsh Government. The Welsh Management Plan is currently being developed by various stakeholders, and will hopefully provide a better understanding of the dynamics of the GWfG flock on the Dyfi Estuary; where the most effective management interventions can be focused for the best outcomes for the geese, farmers and recreational users of the estuary; and provide evidence and direction for the Natural Resource Management Plan for the Dyfi Estuary.”

With this view, NRW promotes Option 1 Plus and supports the production of a GWfG Management Plan. Such a conservation framework will outline key actions to address five key issues to benefit the conservation status of GWfG:

- 1) Ensure that GWfG arrive in Greenland in optimal condition for successful breeding.
- 2) Take all possible steps to minimise additive mortality (i.e. statutory ban on shooting GWfG across its global range).
- 3) Ensure that important areas for GWfG are appropriately protected and managed.
- 4) In collaboration with the Range States, maintain and develop a monitoring and research programme to provide necessary data and information concerning the current conservation status of the population.
- 5) Address and implement all conservation measures to prevent the loss of GWfG as a feature of the Dyfi Estuary SPA (currently in unfavourable condition).

In all Range States, the attitude of the public and conservation authorities toward GWfG is positive, although conflicts with agricultural activities and hunting have occurred in the past on the wintering grounds. This has promoted a need to develop engagement with people likely to come into contact with geese at different stages of their life-cycle, especially farming communities and hunters.

Knowledge and evidence are seen as fundamental to managing natural resources sustainably. Co-ordinated research (e.g. GPS tracking to map distribution of feeding areas, roosting area and flight-lines) with partners would improve our understanding of the requirements and dynamics of the GWfG on the Dyfi and possibly elsewhere.

The evidence from research and associated monitoring will enable the most effective habitat management actions to be focused on the best outcomes for geese, farmers (e.g. via improved livestock grazing), landowners and recreational users of the estuary.

Managing wintering sites to optimise the quality and quantity of food will enable GWfG to attain the best possible body condition prior to migration to spring staging areas in Iceland.

⁹ http://www.unep-aewa.org/sites/default/files/document/nr_aewa-mop6_united-kingdom.pdf

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Option 1 Plus supports collaborative partnership, working with landowners, local communities, shooting and wildfowling clubs and non-government nature conservation organisations to achieve conservation gain for a vulnerable species in Wales. This approach supports the Ministerial Statement (July 2013):

“I would like to see a range of people and organisations working together to help protect a range of endangered species in Wales and this includes Greenland White-fronted Geese. Measures such as an extension of the shooting ban, improved habitat management on the important Dyfi wintering grounds and a more effective recording system to increase our understanding of this precious bird will all help significantly in our efforts to protect this endangered species.”

Option 1 Plus makes use of the wider ‘toolkit’ for species conservation, i.e. a complimentary mix of statutory control of additive mortality through a ban on shooting of GWfG together with proactive efforts to promote conservation and enhancement of the species population and its supporting habitats.

References

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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, put a cross (X) in the box: