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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

36th meeting
Strasbourg, 15-18 November 2016

**3rd MEETING OF THE SPECIAL FOCAL POINTS ON ILLEGAL
KILLING, TRAPPING AND TRADE OF WILD BIRDS**

Tirana, Albania, 14-15 April 2016

**MID-TERM REVIEW OF THE IMPLEMENTATION BY PARTIES
OF THE TUNIS ACTION PLAN 2020**

- Final draft -

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ACRONYMS

AEWA	Agreement on the Conservation of African-Eurasian Migratory Waterbirds
BMI CITES	Brigade Mobile d'Intervention CITES [CITES National intervention brigade -- France]
CEPOL	European Union Agency for Law Enforcement Training
CIS	Conservation Impact Statements
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CMS	Convention on the Conservation of Migratory Species of Wild Animals
ENEC	European Network against Environmental Crimes
EU	European Union
EU TWIX	European Union Trade in Wildlife Information eXchange
FACE	European Federation of Associations for Hunting and Conservation
FKNK	Federazzjoni Kaccaturi Nassaba Konservazzjonisti [Federation for hunting and conservation - Malta]
FNC	Fédération Nationale des Chasseurs [National hunters' federation – France]
IKB or IKTTB	Illegal Killing Trapping and Trade of Birds
IMPEL	European Union Network for the Implementation and Enforcement of Environmental Law
INTERPOL	International Criminal Police Organization
ISPRA	Istituto Superiore per la Protezione e la Ricerca Ambientale [National institute for environmental protection and research – Italy]
MME	Magyar Madártani és Természetvédelmi Egyesület [Hungarian ornithological and nature conservation society – Hungary]
NGO	Non Governmental Organization
OCLAESP	Office Central de Lutte contre les Atteintes à l'Environnement et à la Santé Publique [Central Office for the Fight against the Crimes to the Environment and Public Health – France]
ONCFS	Office National de la Chasse et de la Faune Sauvage [National Hunting and Wildlife Agency – France]
RSPB	Royal Society for the Protection of Birds – United Kingdom
SFP	Special Focal Point
TAP	Tunis Action Plan

1. INTRODUCTION

The illegal killing, taking and trading of wild birds is an issue that has been under scrutiny by the Bern Convention for many years.

The first act of the Standing Committee of the Bern Convention on this issue was in 1986, when it approved Recommendation No. 5¹ calling on the Contracting parties to ‘*ensure the persecutions of persons illegally catching or killing birds or establishments commercialising live or dead protected birds*’ and ‘*the promotion of educations of hunter and the general public and the disseminations of information on the need to conserve wild birds and their habitat*’. Since then the illegal killing, taking and trading of wild birds has been in the agenda several more times. As an example we recall Recommendation No. 90² on the catching, killing or trading of protected birds in Cyprus.

In 2011, the Bern Convention organised the 1st International Conference on illegal killing, trapping and trade of wild birds (IKB) in Larnaca, noting the problem of IKB had been on the agenda of its Standing Committee quite regularly and the trends were worrying.

The Larnaca meeting set up a European vision on tackling the matter and produced a Declaration³ calling governments to adopt a zero-tolerance approach towards IKB, and Recommendation No. 155⁴. Two years later in 2013, the Convention promoted the organisation of the “Week on the conservation of wild birds”, in co-operation with the CMS. On that occasion, the Convention organised the 2nd International Conference on IKB, in Tunis, together with the meeting of the CMS working group on poisoning. The Tunis conference delivered the so-called Tunis Action Plan 2020 (TAP), included in Recommendation 164⁵ as a way to pass from a “Vision” to “Action”. An indirect consequence of the TAP has been the preparation of an EU Roadmap for IKB⁶, as a way to enable the European Commission to monitor the progress of its Member States in the implementation of the Tunis Action Plan.

In the three years since the Tunis Action Plan, important steps were taken and crucial outputs delivered. A Network of Special Focal Points (SFP) for IKB was established and met several times; the third meeting was held on 14-15 April 2016 in Tirana. The SFP Network is the body in charge of the supervision of activities against IKB under the Bern Convention. The main partners in this work are the AEWa, the CMS, the INTERPOL, the EU, BirdLife International and FACE. More regular contacts with the CITES are being established.

Several fundamental documents have contributed significantly to the implementation of the TAP: a “methodology document” to identify black-spots⁷ of IKB; the “sentencing principles”⁸ to inform the process of imposition of sanctions, as a way to help the judiciary evaluating the consequences of each

¹ [Recommendation n° 5 \(1986\) of the standing committee on the prosecution of persons illegally catching, killing or trading in protected birds.](#)

² [Recommendation No. 90 \(2001\) on the catching, killing or trading of protected birds in Cyprus, adopted by the Standing Committee on 30 November 2001](#)

³ [Decl\(2011\)01E- European Conference on Illegal Killing of Birds - Larnaca, Cyprus, 7th July 2011 - Larnaca Declaration.](#)

⁴ [Recommendation No. 155 \(2011\) on the Illegal Killing, Trapping and Trade of Wild Birds.](#)

⁵ [Recommendation No. 164 \(2013\) on the implementation of the Tunis Action Plan 2013-2020 for the eradication of illegal killing, trapping and trade of wild birds.](#)

⁶ [Roadmap towards eliminating illegal killing, trapping and trade of birds.](#)

⁷ [Methodology document to identify black-spots of illegal killing of birds](#)

⁸ [Proposals for informing the process for the imposition of sanctions in wildlife crime cases, especially the illegal killing, taking and trading of wild birds](#)

offence and apply deterrent sanctions and a “list of gravity factors”⁹ to be integrated into national legislations (both endorsed by the Standing Committee through Rec. 177 (2015))¹⁰ and some criteria to set-up national policy/investigation priorities¹¹.

2. METHODOLOGY

In order to assess the level of implementation of the Tunis Action Plan at national level, a questionnaire developed by the Secretariat was circulated to all Contracting Parties in early 2016.

The scope of the present review is to estimate the progress toward the implementation of the Tunis Action Plan by means of assessing the replies to the questionnaire. This has been done with a ‘distance to target’ approach. Each answer (or group of answers) in each questionnaire was given a score ranging from 0 to 4 according to an increasing level of progress toward the actions proposed in the Tunis plan:

0: Action not needed/not relevant

1: Little or no progress (0-10%) only piecemeal actions not part of a strategic approach;

2: Some progress (11-50%), but no significant progress yet;

3: Good progress (51-75%), but target still not reached;

4: Action completed, no further work required except continuation of on-going work.

In the main text a colour-coded table provide the number of replies for each score.

This method also allows to show the level of implementation for each question through a graph ([Figure 1](#)) where the **green** indicates the percentage of responses reporting the action as ‘completed’, **yellow** the percentage of responses reporting ‘good progress’, **orange** the percentage of replies indicating that the progress has been limited and **red** the percentage of minimal or no progress.

Furthermore the scoring system is presented in a graph for each responding country, which allows identifying clearly the areas where more work is urgently needed in each country ([Figure 2](#)).

The analysis did not include the replies by the European Commission as many questions were not relevant, given the coordinating and facilitating role of the institution. Nevertheless the replies of the Commission are summarised in each relevant session.

3. REPLIES TO THE QUESTIONNAIRE

The first deadline for submitting replies to the questionnaire was 25th March 2016: 13 Contracting Parties replied by that deadline. A preliminary report was presented at the 3rd Meeting of the Special Focal Points on Illegal Killing, Trapping and Trade on wild Birds held in Tirana on 14th April 2016.

The first draft was circulated to all Contracting Parties for comments to be sent in by 31st May 2016. The number of filled in questionnaires received from the Contracting Parties increased to 17.

A second draft was circulated in July with a final deadline for submission of comments and inputs set at 16th September 2016. The present document is the third and final draft summarising the replies received from 24 Contracting Parties.

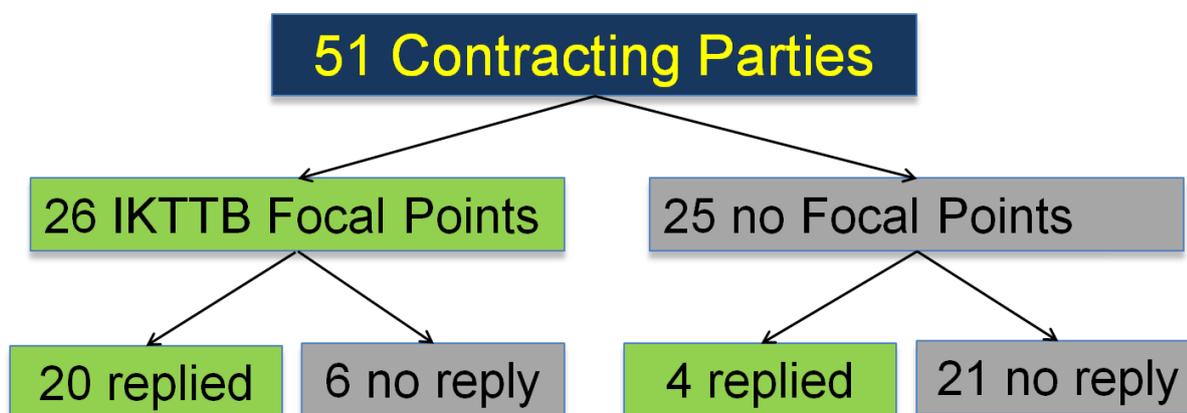
The Secretariat received the 24 replies from: Albania, Armenia, Belgium, Bosnia and Herzegovina, Croatia, Cyprus, Czech Republic, Estonia, European Commission, France, Georgia, Hungary, Italy, Malta, Monaco, The Netherlands, Norway, Poland, Serbia, Slovak Republic, Spain, Sweden, Turkey and the United Kingdom. This means that 45 % of the Contracting Parties to the Bern Convention have submitted a questionnaire duly filled.

⁹ [Analysis of gravity factors to be used to evaluate offences and list of standardized/harmonized gravity factors](#)

¹⁰ [Recommendation N° 177 \(2015\) on the gravity factors and sentencing principles for the evaluation of offences against birds, and in particular the illegal killing, trapping and trade of wild birds](#)

¹¹ [Recommendation No. 171 \(2014\) of the Standing Committee, adopted on 5 December 2014, on the setting-up of national policing/investigation priorities to tackle illegal killing, trapping and trade of wild birds](#)

Out of the 26 Parties that have named a Special Focal Point for Illegal Killing, Trapping and Trade of Wild Birds, 20 (77%) have submitted a reply to the questionnaire. Four countries (Bosnia and Herzegovina, Netherlands, Norway and United Kingdom) have returned their questionnaire duly filled-in although they have not, nominated as per 1st October 2016, a Special Focal Point.



4. RESULTS

4.1 Enforcement and legal aspects

4.1.1 National Priorities (questions 1.A1, 1.A2)

The first expected result of the TAP is the identification of national wildlife crime priorities. The Network of Special Focal Points for IKB, as planned, has produced a Methodology Document to Set up National Policing and Investigation Priorities as Appendix 9 to Recommendation No. 171 (2014)¹².

National Priorities	7	5	7	4	0
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Twelve countries (Albania, Belgium, Croatia, Cyprus, Hungary, Malta, Netherlands, Norway, Serbia, Spain, Turkey and United Kingdom) have identified policing and investigation priorities to tackle wild-bird crimes in their country among them seven have also detailed in a table the ongoing and planned actions. They are summarised in [Table 1](#). European Commission has also identified clear priorities and actions to ensure proper implementation of the EU nature legislation, which itself is the priority for the EU Biodiversity Strategy.

As a reaction to the wide-spread poaching, particularly affecting waterbirds, Albania has enforced a complete ban of hunting for two years and is planning to extend it for 5 more years.

Armenia, Bosnia Herzegovina and Poland have not yet identified the priorities, while Georgia has identified the eradication of poaching as a priority.

Belgium: in the Flemish Region the priorities are part of the enforcement plan of the Agency for Nature and Forests, for the Walloon Region the main priority (trapping or 'Tenderie') is listed in the annual action program of the Anti-poaching Unit. In the Brussels-Capital Region, hunting, including shooting/trapping and catching, is forbidden and the draft regional plan on nature (soon to be adopted by the Government) recalls those prohibitions.

Croatia has identified priorities, but no specific actions are defined to address them.

In Cyprus the identified priorities are part of the strategic action plan against illegal trapping of wild birds 2016-2020 which was approved by the Council of Ministers on May 2015.

¹² [Recommendation No. 171 \(2014\) of the Standing Committee, adopted on 5 December 2014, on the setting-up of national policing/investigation priorities to tackle illegal killing, trapping and trade of wild birds](#)

The Czech Republic has not yet identified the priorities, but has recently established an interdepartmental working group that is expected to involve all interested institutions and government bodies in the identification of priorities and improving cooperation between the different governmental bodies.

Estonia has not yet established priorities to fight illegal killing of birds although the report mentions a challenge, which is the need to educate and raise awareness among foreign hunters about wild birds and the national legislation for their protection.

In France the fight against illegal killing of birds is among the priorities listed in the Strategic plan 2012-2016 of the National Agency on Hunting and Wildlife (ONCFS), but policing and investigation priorities have not been set.

In Hungary the priorities have been identified through a consultative process.

Italy has not yet identified priorities, but a workshop was organised, in June 2016, by the Ministry of Environment involving ISPRA (the technical/scientific body of the Ministry of the Environment), Ministry of Agriculture, Regional administrations, State Forestry Corps, District Ranger Corps, stakeholders (mainly conservation NGOs and hunting associations) and experts to draft a national action plan to tackle wild-bird crime.

Malta has the legal priorities embedded within national legislation, heavier penalties are given based on the seriousness of the crime, while the policing and enforcement priorities are still subject to discussion; the ranking given in the table below is therefore indicative.

Monaco has not recorded crimes against birds, so no prioritisation is required, but a new regulation is being developed.

In the Netherlands the possession and trade of protected species has the highest priority at national level.

In Norway egg collection, taxidermy and taking / trading of raptors are the main priorities which were set by the Environmental Agency also based on information from NGOs or public.

Serbia has identified the poisoning of raptors as the main issue, which is being addressed by a number of governmental agencies and non-governmental organisations.

Slovak Republic has not yet identified the priorities as a national action plan is being developed.

Spain has identified four priorities and has developed national guidelines in relation to the fight against illegal poisoning and trapping of finches (which is legal, with certain limitations, following derogation procedures included in the article 9 of the Birds Directive).

In Sweden, wildlife crime concerning native wild bird species is relatively scarce; nevertheless a national action plan has been proposed and included in a report on how to streamline and tackle wildlife crime prepared by the Swedish Board of Agriculture and the Swedish Environmental Protection Agency. The action plan has been produced in accordance with the EU Recommendation 2007/425¹³.

Turkey has identified the trapping and trade of raptors, alongside poaching of game species as the main priorities.

4.1.2 Administrative processes for the implementation and monitoring of priorities (1.A3 - 1.A6)

The priorities were (or will be) identified through national consultation processes within the governmental agencies, and in most cases involved NGOs, and in few cases (Albania, Italy, Malta, Turkey and United Kingdom) also academia and independent experts.

Extent of consultation	5	7	9	2	0
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¹³ [Commission Recommendation \(2007/425/EC\) identifying a set of actions for the enforcement of Council Regulation \(EC\) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein](#)

Specialised law enforcement agencies are in place in: Belgium (Flemish Region, Nature Inspectorate of the Agency for Nature and Forests, Walloon region: Anti-poaching Unit), Croatia (Nature Protection inspection, Hunting inspection), Cyprus (Game & Fauna Department and Cyprus Police), , France (National hunting and wildlife agency - ONCFS), Hungary (National Park Directorates' rangers), Italy (State Forestry Corps, Regional Forest Corps), Malta (Wild Birds Regulation Unit), Spain (Nature protection service - Seprona), Turkey (Wildlife Rangers) and United Kingdom (National Wildlife Crime Unit and Metropolitan Wildlife Crime Unit). In all other countries the enforcement of wildlife crimes are carried out by the law enforcement agencies with a varying level of engagement of the environmental agencies.

Specialised forces	10	4	6	2	0
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Unfortunately, in most cases the prioritisation does not seem to have a formal endorsement by the relevant Ministry/ies with the notable exceptions of Albania, which is implementing a hunting ban approved by the Parliament, Cyprus where the action plan has been approved by the Council of Ministries.

Control mechanisms for the enforcement of the law are in place in each country, but no specific monitoring of the implementation of the priorities is in place with the notable exceptions of Cyprus and United Kingdom and to a certain degree, Malta and Georgia. In Italy the monitoring plan is part of the national Action Plan being developed. Bosnia and Herzegovina indicated the need for improved implementation of their control mechanism

Control mechanisms for implementation	2	2	15	1	3
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The identification of national priorities is an important exercise as it improved (or has the potential to improve) the effectiveness of the efforts to address illegal killing of birds by the national law enforcement agencies. Challenges remain, in particular caused by the limited resources available (Hungary, Turkey) and on the assessment of the impact of the illegal activities (Cyprus), but see § 2.2.1. for the analysis of the size of the IKB problem.

4.1.3 Art 12 reporting (1.A7)

All EU Member States are requested to report on the implementation of the Art 12 of the Birds Directive at the national level. The report requires, among other analysis, an assessment of the impact of each threat reported. The illegal killing, taking and trade of wild birds have been mentioned by five Member states in their Art 12 report: Cyprus, Czech Republic, Italy, Malta and Spain.

Art 12 reporting	0	15	0	0	9
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The reporting format under the Article 12 of the Birds Directive requests information on threats and pressures (using scale 'low', 'medium', 'high' importance) and trapping, poisoning, poaching is part of the list of threats and pressures. However there is no quantified information requested. The lack of awareness or of formal assessments of the conservation impact of IKB on the national populations are probably the main reasons why only five countries have mentioned poaching in the national Art 12 reports. Article 12 reporting has the potential to being used to monitor the extent and seriousness of poaching, but countries will need to pay more attention to this issue and the European Commission can remind all Member States on the need to carefully report on the threats.

4.1.4 Identification of the areas of offending in all concerned Parties (1.B1)

The establishment of national databases would allow the identification of the areas of offending in all concerned Parties (Expected Result 1, Objective 2).

In Cyprus, Estonia, France, Malta (since 2013), Turkey (since 2016) and United Kingdom specific and official national databases are in place to collect information on IKB cases.

Databases on IKB	6	11	2	4	1
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The data on IKB in France is collected by the ONCFS and sent to the National Observatory on delinquency and penal responses to be used in their annual report. Also in Malta a national report based on the database is produced and is available on line. The United Kingdom National Wildlife Crime Unit coordinates the recording of wildlife crimes and analyses the data to identify national priorities.

In most of the other countries there are a number of databases kept by the law enforcement agencies, environmental protection agencies and NGOs, but they are not coordinated or integrated and often limited in scope (e.g. gathering data only on poisoning of raptors) and therefore, at the moment, do not constitute a useful tool to monitor IKB as a whole.

In Albania, law enforcement agencies collect data on persecutions related to IKB and the data is part of the national statistics of offences, but also NGOs collect data on IKB cases.

Belgium has regional databases although no clear processes are in place to integrate the three datasets. In Croatia each agency has its own database, but they are not coordinated to provide a proper analysis of the issue.

The newly established Czech Working Group will be working in coordinating the law enforcement agencies also to collect data.

MME / BirdLife Hungary keeps track of the IKB concerning raptors at national level while each National Park Directorate records every IKB case they are aware of; all data are shared with the Ministry of Environment, but the prosecutions and sentences are not included.

Italian Forestry Corps keeps track of each case it is involved with but details are limited; furthermore several other agencies, including regional forestry departments, collect data but the databases are not integrated. Also in Spain, the collection of data is implemented at different levels and there is no official procedure for compiling the data, as the databases are not coordinated.

Serbia a cooperation protocol on eradicating the IKB between authorities and organisations has been drafted and includes plans for data sharing.

Because in most Contracting Parties data gathering and analysis are not well developed yet, the identification of priorities has largely been done on the basis of expert opinion and through rather comprehensive consultation processes. The consultation processes have may have reduced the biases that can originate from the sole reliance on incomplete records of prosecuted cases.

4.1.5 *Sharing knowledge (I.B2)*

Improving the evidence base by promoting the Conservation Impact Statement (CIS) is the first objective of second expected result of the TAP. In order to achieve this, TAP includes actions aimed at ensuring the expert knowledge on the CIS is shared with the investigators and the judiciary system.

Many of the countries (Belgium, Cyprus, Croatia, Estonia, France, Hungary, Italy, Netherlands, Malta, Serbia, Spain and Turkey) have dedicated police and investigation agencies on wildlife / environmental crimes, which are in regular contact with universities, musea and NGOs, ensuring the availability of information and expertise during investigation. Specific focal points have been identified in Belgium (Walloon Region), France (dealing with CITES issues), Spain (focussing on the implementation of the national strategy against illegal poisoning) and Sweden.

Sharing knowledge	9	4	5	5	0
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Police units or agents specialised in wildlife crime are present in eight countries (France, Italy Malta, Netherlands, Norway, Slovak Republic, Sweden and United Kingdom). Their expertise is therefore directly available for the prosecutors and the judges.

In six countries (Belgium, Croatia, Estonia, Hungary, Italy, and Spain) the national environmental agency or specialised law enforcement agencies provide regularly technical support to the prosecutors and judges directly or through a network of experts from institutions and NGOs. Improvements are being discussed in Czech Republic, Italy, Serbia and Turkey.

In Belgium, the representative of the Brussels Environment Inspection Services contributes to the definition of the criminal prosecution policy of the College of General Prosecutors.

In the Czech Republic the issue will be discussed by the newly established working group on IKB.

France has established, within the ONCFS, a dedicated national brigade (BMI CITES), which has established links with the experts and the Central Office for the Fight against the Crimes to the Environment and Public Health (OCLAESP).

In Hungary there is good cooperation between the Park Directorates, NGOs and the National Bureau of Investigations and the links with the prosecutors is being strengthened through specific trainings.

In Malta the Specialist Enforcement Branch of the Wild Birds Regulation Unit provides specialised expertise to prosecutors and investigators.

In Norway in each of the 32 areas the police have a coordinator acting as a focal point on IKB.

In Slovak Republic there are 10 police specialists for environmental crime to assist investigators and 1 specialist in the General Prosecutor's office to assist prosecutors.

A national unit within the Swedish Police handles all cases of wildlife crime and serious violation of the Hunting Act. Also, a national unit within the Prosecution Authority work together with the police on the same.

Environmental agencies in United Kingdom cooperate with the police and the judiciary based on written agreement.

Summarising: information and expertise are regularly available to the investigators, while it is not too clear how this expertise can reach and inform the judiciary end of the legal process. In Albania, IKB is only considered an administrative crime; therefore there is no involvement of prosecutors and judges.

4.1.6 Coordination of action (1.B3)

The exchange of information and coordination of actions on illegal activities at national level is not considered an issue, due to the limited number of cases recorded, in Belgium, Croatia and Norway or because of the existence of a single agency/unit dealing with IKB (Cyprus, Estonia, France, Malta) In the Netherlands a special police working group exchange information between different departments).

In the other countries although there are national agencies which gather information on wildlife crime and are available for supporting the cases, formalised processes to support prosecutors and judges in their dealing with wildlife crimes don't exist.

Coordination mechanism	11	4	3	2	3
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In Albania there are 12 regional offices of the Directorate of Inspectorate of Forestry Police and the directorate that creates a network, which collects information on this issue.

Czech Republic, Italy and Serbia are developing working groups, protocols and action plans which will address the need for supporting the prosecutors and judges in dealing with wildlife crimes.

The Hungarian HELICON Life project has established a coordination structure on IKB and other specialised platforms are in place (e.g. National Raptor Conservation Council, Anti-poisoning Task Force). However, coordination is required to streamline the process.

In Italy there is no coordination despite the there are several enforcement agencies (national and regional) dealing with IKB. The national action plan to be developed in 2016 will address this issue.

In Spain there is an official working group on the illegal poisoning but not for the general issue of illegal killing of birds.

In Sweden the draft action plan proposes an infrastructure for information exchange and coordination.

The exchange of information and coordination in Turkey is implemented through the Central Hunting Commission, which meets every month in different regions and is attended by the regional and provincial directors of the General Directorate of Nature Conservation and National Parks.

4.1.7 National platforms (I.B4)

TAP foresees the development of an internet web portal offering guidance on Conservation Impact Statements (CIS) preparation and access to specialised law firms, advocates, expert witnesses and independent specialists. This is not available in any country as yet.

National platforms (CSI)	0	9	12	1	1
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The level of information available, on-line, for professionals varies significantly but is generally limited to existing legislation; in some cases on dedicated web-pages statistics on wildlife crime are also available, but only in Hungary the website of the HELICON Life project contains information on protocols on what to do when a poisoned/shot bird is found, protocols for veterinary intervention etc. which are particularly useful when gathering evidence for the prosecution of the crime.

Cyprus, Estonia, France, Norway, Turkey and United Kingdom have specific and comprehensive national databases where details of all cases on violations, wildlife convictions and on the spot fines are recorded; the databases are accessible only by police and relevant authorities. Albania, Serbia and Sweden are planning to develop such an on-line system for information exchange.

In Belgium the Flemish region produces a report on violations, which is published on line and further info are available on NGOs websites.

In Czech Republic there is a web portal (www.karbofuran.cz) created by Czech Society for Ornithology, which provides recommendations for the general public on what to do in case of a suspected case of poisoning of raptors. Also in Slovak Republic a website developed by the NGO Raptor protection of Slovak Republic offers information for the public (<http://www.dravce.sk/vtaciakriminalita/>).

In Italy the only national platform on IKB presently available is the database of the National Forestry Corp, which does not collect detailed data on each case.

In the Netherland most agencies and organisations have their own data recording systems which are not integrates and mutually accessible, but data are shared through mutual consultation.

The small size of Malta allows the exchange of information without the need of an IT platform, although the Wild Bird Regulation Unit has developed a number of online systems and databases used by the police patrols.

In Slovak Republic an official web portal to provide information and resources for the professionals has not been established yet. There are, however, web pages managed by an NGO which offers information for the public. <http://www.dravce.sk/vtaciakriminalita/>.

In Spain data exchange between regional authorities and national bodies occurs only through direct communication within the framework of official working groups.

Illegalsities related to international trade of wildlife can be shared between national authorities through the EU TWIX portal (password protected) and in France a specific website is dedicated to the implementation of CITES.

The European Commission has set up a website dedicated to activities to combat illegal killing, trapping and trade of birds in the European Union, including the EU Roadmap on the illegal killing of birds.

4.1.8 Gravity factors (1.C1)

The third expected result is the identification and standardisation of the gravity factors. The TAP lists 11 Gravity Factors which have been endorsed by the Standing Committee in Recommendation N° 177 (2015)¹⁴. The next step is sharing them with the police and judicial authorities. This has happened in only 4 countries.

Gravity factors shared	5	3	1	13	1
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France, Malta, the Netherlands, Sweden and United Kingdom have the gravity factors already embedded within the relevant national legislations. Furthermore, in Malta, Recommendation 177 has been disseminated to the Ministry responsible for Justice, the members of the judiciary involved in the hearing of cases concerning bird-related crime, the Office of the Attorney General and the Commissioner of Police.

The Game Wardens of Cyprus highlight the gravity factors in their statements while filing their complaints with the police and a similar process occurs in Georgia.

The sentencing guidelines and the gravity factors were summarised in three training sessions held for representatives of the Hungarian judiciary in February 2016.

Norway will take into consideration the sentencing and gravity factors when revising the relevant national legislation and regulations.

In the other countries no actions have been taken, yet, as the recommendation is rather recent (December 2015). In Albania the wildlife crimes do not result in court cases as they are only an administrative offence.

The European Commission has brought the sentencing guidelines to the attention of the European Forum of Judges for the Environment, which is a voluntary association of judges practising in the EU Member States, as well, to the European Network of Prosecutors for the Environment.

4.2 Biological and institutional aspects

4.2.1 Analysis of illegal activities (2.1)

Data on illegal killing activities directly affecting wild birds are collected largely by the law enforcement agencies as detailed in § 4.1.4 above. Data are regularly analysed and used to identify black-spots in Belgium, Cyprus, Estonia, France, Malta, Norway, United Kingdom and Turkey. Although in Turkey, data are currently limited as the database has just been introduced at the beginning of 2016.

Data on poaching analysed	8	3	2	9	1
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In Italy black-spots have been identified by gathering information and knowledge from several sources including NGO assessments.

In Albania, Georgia and the Netherlands mechanisms for gathering data are in place but the full analysis has not been implemented yet.

The reporting under Article 12 of the Birds Directive may provide useful data on the illegal activities depending on how accurately countries are reporting the threats and pressures.

4.2.2 Legal harvest statistics (2.2)

Data on mortality due to legal harvest is available in 10 countries. Hunters are requested to fill a 'carnet de chasse' recording their prey. The bag data are sent by the hunters to the national agency in Armenia, Belgium, Croatia, Estonia, Hungary, Malta, Norway and Sweden; in Turkey an internet-

¹⁴ [Recommendation No. 177 \(2015\) on the gravity factors and sentencing principles for the evaluation of offences against birds, and in particular the illegal killing, trapping and trade of wild birds](#)

based system (AVBIS) is in place since 2016, and an on-line telephone-based real-time system is operational in Malta.

Data on legal harvest available	10	2	2	9	0
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In Cyprus bag statistics are collected through a detailed questionnaire sampling about 1% of all hunters and through road blocks during hunting season.

In France, a statistical survey of hunting bags of the 2013-2014 hunting season was performed by ONCFS in partnership with the National Federation of Hunters (FNC). This survey covers all hunted species, mammals and birds. The results are available on line¹⁵ and provide an overview of the evolution of bags by comparison with the results of the last such survey carried out in 1999. This survey will be repeated at a frequency to be determined according to the means available.

In Poland the data are collected on the base of the use of permits issued by the Environmental Protection Directorate.

In Italy the regional authorities are required to send the hunting bag data to the national government every year since 2012, but not all regions have complied. A specific database and protocol is being developed to collect data.

All EU countries are requested to report on the derogations to the Birds Directive as per Art. 9 using the HABIDES reporting tool. Furthermore the new reporting format under the Article 12 of the Birds Directive (2013-2018) will request information on the hunting bags of Annex II bird species (hunnable species) and also on Annex V species of the Habitats Directive.

4.2.3 *Illegal mortality estimates (2.3)*

Estimating the mortality due to illegal killing, trapping and trade and illegal activities is a very complex exercise. Relying only on official data will provide only a minimum number and will be biased by enforcement efforts that are likely to be uneven within and between countries. It may be possible, to certain extent, to compensate for such bias by including reports from other stakeholders (conservation NGOs and hunters' associations). It will be important to find an agreement on the illegal activities that are more likely to have a negative impact on the species and where those activities are more intense. Furthermore, having an understanding of the impact of illegal killing on species, which are also legally hunted, will help in their management.

Illegal mortality estimates	1	1	5	16	0
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Only Malta provided an estimation of the numbers of bird illegally killed; the estimate was given by the Wild Birds Regulation Unit to BirdLife Malta and the Malta Ornis Committee as part of the review of the draft findings of IKTTB study for Malta conducted by BirdLife Malta.

In the Netherlands it is estimated in about 200 the number of nests of raptors intentionally destroyed every year with significant regional variations.

Serbia mentions 'high mortality' of birds in agricultural land caused by the illegal use of carbofuran on poison baits.

Belgium, Norway and Sweden indicate that illegal killing is infrequent and has very limited impact on wild birds. Estonia mentions the issue of travelling hunters from southern Europe as a potential source of problems.

The number of illegal killing is assumed to be significantly higher than the number of recorded cases in the Czech Republic. In Turkey estimates may come from the new data recording system.

¹⁵

http://www.oncfs.gouv.fr/IMG/file/publications/revue%20faune%20sauvage/FS_310_enquete_tableau_de_chasse.pdf

Table 2 compares the situation in all countries as per their replies to the questionnaire and as per the study published by BirdLife International (2015)¹⁶ that covers only the Mediterranean countries. It is interesting to note that when estimated, the trend in most cases is generally stable (with the notable exception of France); the only largely increasing trend was reported in Cyprus. These figures indicate that there is still ample room for improvement in most countries.

4.3 Awareness aspects

4.3.1 *Studies and knowledge of the drivers (3.1)*

Knowing the drivers and reasons behind the illegal activities against wild birds is crucial: it would allow to accurately target communication and law enforcement actions. Unfortunately, no formal and comprehensive study has been conducted in any of the Contracting Parties responding to the questionnaire.

Knowledge of drivers	0	3	6	14	0
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In Cyprus the three main drivers are considered to be: food consumption, ‘tradition’ and (probably most important) profit making.

Some information is available in Hungary on the threats to Imperial eagle (and applicable to other raptors), but no overall assessment has been done.

A preliminary report by ISPRA indicates that in Italy ‘traditional gourmet cuisine’ is the driving factor behind the killing of small birds; killing of raptors is often done to respect a ‘tradition’, to prevent predation on game species and taxidermy. Chicks or eggs are taken and traded for falconry or collections.

A number of studies were carried out in Malta by independent researchers on this issue: taxidermy, trophy trade and trade in cage birds are the three main drivers. According to the reply, in the past, “recreational satisfaction”, including “thrill killing” aggravated by lack of hunting opportunities and frustration / rebellion against official regulations were also known to be major drivers.

In Turkey the main driver seems to be the ‘uncontrolled urge of hunting’ while the taking of raptors is driven by demand (and money) from the Gulf countries.

The RSPB regularly produces a Bird Crime report, which provides an insight on the drivers and impact of bird persecution in the UK.

4.3.2 *Awareness raising platforms and campaigns (3.2 & 3.3)*

It is clear that illegal killing of birds has to be addressed not only by stricter enforcement of the law, but also by changing social attitude toward a crime that often is considered a minor issue by the general public and local decision makers. Such change can be achieved only through a sustained communication and public awareness effort.

Public awareness campaigns	11	3	3	5	1
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¹⁶ [A.-L. Brochet, W. Van Den Bossche, S. Jbour, P. Kariuki Nding'ang'a, V. R. Jones, W. A. L. I. Abdou, A. R. Al-Hmoud, N. G. Asswad, J. C. Atienza, I. Atrash, N. Barbara, K. Bensusan, T. Bino, C. Celada, S. I. Cherkaoui, J. Costa, B. Deceuninck, K. S. Etayeb, C. Feltrup-Azafaf, J. Figelj, M. Gustin, Pr. Kmecl, V. Kocovski, M. Korbeti, D. Kotrošan, J. M. Laguna, M. Lattuada, D. Leitão, P. Lopes, N. López-Jiménez, V. Lucić, T. Micol, A. Moali, Y. Perlman, N. Piludu, D. Portolou, K. Putilin, G. Quaintenne, G. Ramadan-Jaradi, M. Ružić, A. Sandor, N. Sarajli, D. Saveljić, R. D. Sheldon, T. Shialis, N. Tsiopelas, F. Vargas, C. Thompson, A. Brunner, R. Grimmett and S. H. M. Butchart \(2016\). Preliminary assessment of the scope and scale of illegal killing and taking of birds in the Mediterranean. Bird Conservation International, 26, pp 1-28
doi:10.1017/S0959270915000416](https://doi.org/10.1017/S0959270915000416)

The issue of IKB is addressed by nation-wide initiatives in Croatia, Cyprus, Hungary, Italy, Malta, Netherlands, Serbia, Spain, Sweden, Turkey and UK. They are implemented by the governmental agencies or by the NGOs, and in several cases the campaigns are carried out jointly.

NGOs in Albania, Armenia, Bosnia & Herzegovina, Czech Republic and Slovak Republic run education and public awareness campaigns about poaching which are dependent on funding from donors.

In 2014 a targeted campaign was developed in the Flemish Region (Belgium) informing the bird keepers on the illegality of the manipulation of official bird rings.

The Croatian Ministry for the Environment had awareness campaigns on stopping illegal taking of strictly protected species from nature and illegal wildlife trafficking.

Cyprus Game & Fauna Department is conducting lectures and presentations at events, as well as, schools (elementary and secondary) about the issue and special lessons are also conducted for the prospective hunters who wish to obtain a hunting licence. Also NGOs involved in the fight against IKB have implemented similar educational and awareness raising activities. Education and awareness campaigns and initiatives, from 2016, will be part of the implementation of the strategic action plan approved in 2015.

Campaigns to raise awareness of this matter will be conducted in Estonia in accordance with the needs and possibilities

The Hungarian HELICOM Life project (aiming to conserve raptors), has a strong communication component also covering IKTTB, which includes publications, films, printed materials; under the project, a visitor centre has also been established which focuses on IKTTB against raptors (“Eagle Centre”).

Awareness campaigns in Italy have been implemented in the framework of at least three Life projects aimed at preventing illegal trapping of birds (LIFE11 INF/IT/000253) and the poisoning of birds in central Italy (LIFE07 NAT/IT/000436 and LIFE13 NAT/IT/000311 PLUTO). Targeted campaigns are also implemented at black spots (Sardinia, Lombardy, Messina straits) by NGOs in collaboration with the State Forestry Corp.

In Malta, the Wild Birds Regulation Unit along with dissemination of regulatory information through the website, implements targeted media advertisement, bulk mailshot and bulk SMS, as well as, meetings with stakeholders and the general public. Also NGOs, including BirdLife Malta and the main hunting federation (FKNK) routinely conduct educational campaigns including campaigns targeting schools (e.g. Dinja Wahda campaign at schools is run by BirdLife Malta).

Several awareness raising actions have been implemented in the Netherlands and in particular twelve organisations on nature and environment have set-up the Wildlife Crime Campaign about wildlife crimes.

The WWF office in Belgrade launched a campaign against the poisoning of White-tailed Eagles in Serbia.

Several Life projects in Spain have run public awareness campaigns about poison baits and bird trapping (parany). The VENENO Life+ project by SEO/BirdLife developed in 2015 the manual "Illegal use of poisoned-baits: Legal analysis and investigation", aiming to wipe out the illegal use of poisoned-baits in Spain's countryside. This manual has been recently translated into English, so it can be used more widely. This project is considered among the best Life+ examples.

In 2014-2015, an extensive campaign against poaching was launched in Turkey and several events were organised on this issue. In addition, provincial directorates organise educational events for primary school students each year. These are all, in general, focused on anti-poaching.

The only formal communication strategy approved by a governmental body is part of the national strategy against the use of poison baits in Spain. Furthermore several Life projects have been used to launch campaigns against the ‘paranys’ (Leaving is Living / Volar, Viajar, Vivir - LIFE11

INF/IT/000253), ANTIDOTO (LIFE07 NAT/IT/000436) - both were international projects involving Spain and Italy) and VENENO (LIFE08 NAT/E/000062).

In Sweden, the Country Administrative Boards, which are responsible for hunting management and nature conservation, deliver public awareness campaigns in collaboration with the police and the Environmental Agency.

In United Kingdom numerous campaigns are led by police forces, and NGO's which seek to raise awareness and target specific types of wildlife crime (including wild birds and eggs).

4.4 Coordination, synergies and mainstreaming (4.1 – 4.4)

4.4.1 Coordination between IKB Initiatives and with INTERPOL

The Bern Convention initiative to combat Illegal Killing, Taking and Trading of Wild Birds has resulted in coordinated initiatives with the EU (The Road Map) and the CMS (the Pan-Mediterranean Task-Force). The European Commission is also in the position to provide good linkage between these initiatives and with the Ornis Committee/Expert Group on Birds and Habitats Directive which meet twice a year and through the Commission's biannual stakeholder meeting on the illegal killing of birds. Other stakeholders of this meeting are BirdLife, FACE, Bern Convention, AEWA, IMPEL and INTERPOL.

Coordination with other IKB initiatives	14	1	5	3	0
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At national level, cooperation between the national representatives involved in these three initiatives seems smooth and effective as in most cases the persons belong to the same Department, Unit or Ministry (Croatia, Georgia, Hungary, Italy, Malta and Spain) or the task is given to the same person (Estonia, Norway).

In Belgium, coordination is ensured through the CITES Enforcement Group. Czech Republic, Serbia and Turkey mention the opportunity or plans for improved cooperation; in the Netherlands and in Poland it is not considered a priority.

IKB often has international components, as perpetrators of wildlife crime travel across borders. INTERPOL has offered its help in a number of actions listed in the TAP. So far, cooperation has been limited although protocols and communication channels are in place in several countries (Armenia, , Cyprus, Hungary, Netherlands, Norway, Sweden and United Kingdom) in other cases only through the Police or the Border Police forces (Croatia, Czech Republic, Serbia, Slovak Republic).

Coordination with INTERPOL	7	4	6	6	0
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In Belgium INTERPOL is involved only on 'major crimes'; in Italy cooperation with INTERPOL on IKB is not active, yet, but information exchange with police corps of other countries has started in the framework of CEPOL courses organised by the European Police College.

Other channels for international cooperation exist, such as direct contact between Belgium, France and The Netherlands, through the courses organised by European Police College in the framework of CEPOL; and IMPEL organised an international meeting hosted by Italian Forestry Corps in May 2016, in near Reggio Calabria.

The Commission has financed a project (under Criminal Justice Support Programme of the European Union) to establish a European Network against Environmental Crime (ENEC) bringing together legal and other practitioners who work in the fight against environmental crime. The project team prepared also a proposal for an EU action plan to tackle illegal poisoning of wildlife. The Commission has informed the EU Member States on this proposed action plan and encouraged them to implement it.

4.4.2 National cooperation mechanisms between investigators and prosecutors

The experience and knowledge of investigators are important resources for prosecutors in assessing the seriousness of the crimes committed against wild birds. As indicated in § 4.1.5, 12 of the 20 responding countries reported the existence of dedicated law enforcement agencies which have institutional links with the prosecutors and the prosecutors have access through them to the required scientific knowledge.

Cooperation with investigators and prosecutors	11	3	4	2	3
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The majority of the countries replying to the questionnaire report examples of cooperation with other countries while investigating wildlife crimes. Some good practices are reported such as dedicated platforms for exchange of info and to discuss environmental enforcement matters (Belgium, Malta, Spain), training for prosecutors (Hungary) and ad hoc meetings organised with the support of IMPEL (Italy, Malta).

International cooperation	8	4	0	11	0
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5. CONCLUSIONS

The response rate to the questionnaire by the Standing Committee has been 77% by the Contracting parties which had nominated a Special Focal Point on IKB. Overall 45% of all the Contracting parties have returned the questionnaire duly filled in. The geographical distribution of the replies covers all areas of Europe, indicating the issue is recognised as significant everywhere in Europe.

There is not a document clearly stating the status of the affairs just before the approval of the TAP that could be used as a benchmark of the Tunis Action Plan and the questionnaire. In some parts the questionnaire is structured in a way that does not allow direct links to the actions of the TAP.

Among the documents used to assess the situation prior to the TAP are the 2013 Report on the Implementation of the Action Points of Recommendation No.155 (2011)¹⁷ and the ‘Overview of databases on illegal killing, trapping and trade of birds in the EU’¹⁸.

Nevertheless, the present review of the implementation of the Tunis Action Plan provided a good picture of the level of implementation of the action points within the contracting parties of the Bern Convention.

On average 6.6 countries indicated that the action was completed for each question, and a further 4.6 that good progress has been achieved toward the completions of the action. Only 5.7 countries in average reported no progress on any action.

Average number of replies	6.6	4.6	4.9	5.7	1.3
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This should be considered as extremely encouraging, but a lot of work still needs to be carried out before the illegal killing, taking and trade of wild birds can be considered fully addressed.

At country level the implementation varies from 94% to 40% (excluding Monaco which reports no cases on IKB). 5 countries report scores above 75% of the maximum, ten above 70% and only three countries score under 50%.

¹⁷ [Report on the Implementation of the Action Points of Recommendation No.155\(2011\) on the Illegal Killing, Trapping and Trade of Wild Birds \[T-Pvs/Inf \(2013\) 13\]](#)

¹⁸ [BirdLife International 2013. Overview of databases on illegal killing, trapping and trade of birds in the EU.](#)

5.1 Enforcement and legal aspects

The majority (60%) of the parties have identified national policing and investigation priorities indicating a rather good level of understanding of the IKB problem at national level and some progress have been made in addressing them in some countries. In eight countries there are specialised law enforcement agencies to tackle wildlife crime; in other countries the awareness of the police forces on the seriousness of the IKB has been raised.

Progress is reported on the collecting of data in order to monitor illegal activities as both Malta and Turkey have started real-time on-line data collections on illegal and legal killing of birds. While in countries where several agencies and stakeholders are collecting data, often the lack of coordination hampers regular monitoring of IKB. The problems are exacerbated by the fact that in many cases the priorities have not been formally recognised or endorsed through e.g. a ministerial decree.

The access to information between professionals involved in the persecution of IKB does not seem to be a serious limiting factor in most countries, often due to the structures and fora established for the implementation of the CITES EU regulation and the Convention.

The access to information and engagement in the fight against IKB of the judiciary end of the legal process is less developed. This is can be address while promoting the Gravity Factors which were recently developed by the Convention, but that have not yet been shared, promoted and discussed at national level.

5.2 Biological and institutional aspects

Some progress is registered in the area of data gathering, but significant efforts will be required to obtain a clear and agreed system aimed at monitoring illegal activities affecting wild birds and to use the data for proper management of the natural resources.

The guidelines for the identification of black-spots developed by the Convention are not mentioned in any of the replies to the questionnaire, although seven countries have data about IKB cases that can result in the identification of black-spots.

Data on legal harvest is collected by hunters in almost 70% of the responding Parties with improvement reported in two countries where data are collected electronically through telephone and the internet.

Official estimates on the mortality caused by IKB are still very rare. The recently published data from BirdLife will hopefully encourage all countries to establish a solid and efficient way to assess the extent and the impact of IKB.

5.3 Awareness aspects

This is the area where more initiatives have been implemented in the last few years, with actions reported in all countries although the scope and focus of the campaigns varies significantly between countries. NGOs have played a major role, and in several cases the campaigns are carried out jointly with the national government and supported by EU Life funding.

The limited understanding of the drivers of IKB (only 3 Parties have provided that some research has been carried out) risks limiting the effectiveness of the campaigns. Well targeted campaigns are likely to be more effective in changing people's attitude toward the multiple forms of IKB.

5.4 Coordination, synergies and mainstreaming

Coordination between the international initiatives at national and international level is good, while the expertise of INTERPOL has not been used to its full potential, mainly because of limited funding.

The development of national mechanisms for cooperation between investigators and prosecutors is less advanced: Contracting Parties could take advantage of some good examples reported in the replies to the questionnaire.

6. RECOMMENDATIONS

Implement the Tunis Action Plan and report on its implementation

Replies were not received from the following countries (in **bold** the Contracting Parties that have nominated a Focal Point for Illegal Killing, Trapping and Trade of Wild Birds): Andorra, Austria, Azerbaijan, Belarus, **Bulgaria**, Burkina Faso, **Denmark**, Finland, Germany, Greece, Iceland, Ireland, Latvia, **Liechtenstein**, Lithuania, Luxembourg, Moldova, Montenegro, Morocco, Poland, **Portugal**, “**the former Yugoslav Republic of Macedonia**”, **Romania**, Senegal, Slovenia, Switzerland, Tunisia and Ukraine.

All Contracting Parties are recommended to contribute toward the full implementation of the Tunis Action Plan and to report on their advances to tackle IKB at national level.

Identify Policy and Investigation priorities

The process of the identification of national priorities requires cooperation between all governmental agencies and other stakeholders (hunting and conservation NGOs). Prioritisation is a crucial step to ensure the limited resources are focused on the most serious crimes and locations.

Eleven of the responding countries have not yet identified their national priorities: Armenia, Bosnia & Herzegovina, Czech Republic, Estonia, France, Georgia, Italy, Monaco, Poland, Slovak Republic and Sweden.

Improve awareness of the Judiciary system about IKB

Investigators and prosecutors are reported to be largely more aware of the seriousness of the IKB. Further efforts need to be made to inform and engage the judiciary system, in order to ensure the gravity factors are properly used in particular in Armenia, Belgium, Bosnia & Herzegovina, Croatia, Cyprus, Estonia, Italy, Poland, Serbia, Slovak Republic, Spain and Turkey.

Improve knowledge on Illegal Killing, Trade and Taking of wild birds

In many countries the information on the extent of illegal activities is still poor or incomplete. As a result it is likely that a factor affecting the wild birds goes undetected or unchecked. Often information is already available but scattered in many databases managed by different law enforcement agencies, NGOs and wildlife recovery centres which handle thousands of animals every year. A national registry/database for IKB should be established and maintained and the information should be gathered in all countries and shared at international level through a system similar to the EU TWIX.

Identify black-spots

Illegal activities against wild birds are often geographically concentrated and black-spots, priority areas for intervention, can be identified and targeted. Guidelines for the identification of black-spots have been developed but most countries seem to not have taken advantage of such methodology. In particular, among the contracting parties that responded to the questionnaire Bosnia & Herzegovina, Croatia, Czech Republic, Hungary, Poland, Serbia, Slovak Republic, Spain and Sweden should improve their efforts to gather and analyse IKB data and identify possible black-spots.

Improve understanding of drivers

So far, three European countries, where IKB is particularly severe, have identified some of the drivers. This is helping the government and NGOs target their law enforcement and awareness raising efforts in their fight to properly enforce the law. Drivers differ for each form of poaching and often between black-spots. All countries should improve their efforts toward understand in details the economic and social motivations behind IKB.

Raise awareness

Most contracting parties responding to the questionnaire have reported that communication and information campaigns have been developed. Although no comprehensive assessment of the campaigns have been carried out, experience indicates that integrated (i.e. using a range of

communications tools) campaigns targeting a specific type of illegal activity (e.g. parany, poisoning or trapping of songbirds in Sardinia) have been very effective, in particular, when carried out in cooperation between governmental agencies and NGOs engaging local communities.

Further explore the cooperation opportunities with international police agencies and initiatives

INTERPOL has indicated several options for cooperation, which have not yet been fully exploited by the Contracting Parties often as a result of limited funds. On the other hand, replies indicate that other international fora for international cooperation on law enforcement have been used successfully to share experience and know-how (e.g. IMPEL, CEPOL, European Forum of Judges for the Environment, European Network of Prosecutors for the Environment, European Network against Environmental Crimes, European Union Action to Fight Environmental Crime). Such good examples should be replicated in all relevant countries and the results widely shared.

Table 1 – National policing and investigation priorities to tackle wild-bird crimes.

Priorities	Poaching	Trapping/trade of song birds	Persecution of raptors	Poison baits	Egg collection	Possession and trade
Countries						
Albania	Poaching of migratory waterbird huntable species					
Belgium	Flemish Region: 1. Illegal trade of birds 2. Large scale illegal trapping of birds Walloon Region: 1. Tenderie (Trapping of finches)					
Croatia	2 Poaching (tape luring, decoys, lights) 4. Poaching (protected species)	5. Illegal trapping of songbirds	1. Shooting of raptors and owl	3. Poisoning of raptors		
Cyprus	1. Poaching	2. Illegal trapping				
Hungary	4. Poaching (protected species)	5. Trapping songbirds for cage	2. Raptor persecution by pigeon-fancier 3. Raptor persecution at poultry /game bird farms 4. Raptor persecution to protect game birds	1. Poisoning small game predators	5. Egg /chick robbing	
Malta	Poaching (Lures, lights) Poaching of protected species (Waders, raptors)	Illegal trapping of finches Import of live finches			Import of dead/stuffed animals	
the Netherlands						Possession and trade of protected species
Norway					2. Egg collection	1. Taking specimens for taxidermy

Priorities Countries	Poaching	Trapping/trade of song birds	Persecution of raptors	Poison baits	Egg collection	Possession and trade
Serbia				Poisoning raptor		
Spain	3 Poaching	2. Parany (Trapping of finches and insectivorous birds)		1. Poisoning		
Turkey	1 Poaching		2. Taking and trading raptors for falconry			
United Kingdom	Poaching		Raptor persecution including poisoning, egg theft, chick theft, taking from the wild and nest disturbance/destruction and to concentrate on golden eagle, goshawk, hen harrier, peregrine, red kite and white-tailed eagle			

Table 2 – Estimations of the number of birds illegally killed each year and its trend.

Country	Questionnaire		BLI		Comments from questionnaire on BLI data
	Estimate	Trend	Estimate	Trend	
Albania	No reliable estimates available		265,000	Decline	
Belgium	Minimal impact	Declining	Not available		
Bosnia & Herzegovina	There are only rough data collected/prepared by NGOs		34,700	?	
Croatia	No estimate available		510,000	?	
Cyprus	No reliable estimates available		2,300,000	Increase	BirdLife estimate challenged by national official bodies.
Czech republic	No estimate, but significantly higher than number of recorded cases.		Not available		
Estonia	Declining interest of local hunters toward birds, but increasing numbers of southern European hunters hinting in Estonia		Not available		
France	No answer		522,000	Decline	
Hungary	No estimate available		Not available		
Italy	No estimate available		5,400,000	?	Index of confidence in estimates rather low
Malta	5,140 – 41,200	?	108,000	Stable	The governmental estimate was given to BirdLife Malta. s part of the review of the draft findings of IKTTB study
Monaco	No estimate available		Not available		
The Netherlands	200 birds of prey nests intentionally destroyed/year. No estimates for other birds	Stable?	Not available		
Norway	Probably very low	?	Not available		
Serbia	High mortality of raptors in Agricultural Areas by Illegal use of FURADAN 35 ST		133,000	Stable	
Slovakia	No estimate available		Not available		
Spain	No estimate available		254,000	Stable	
Sweden	Very low	?	Not available		
Turkey	No estimate available , the AVBIS will gather info on cases reported		71,200	?	
United Kingdom	No estimate available		Not available		

Figure 1 – Overview of the implementation of the Tunis Action Plan: details for each (group of) questions and overall result. Green indicates the percentage of responses reporting the action as ‘completed, yellow the percentage of responses of good progress, orange the percentage of replies indicating that the progress has been limited and red the percentage of minimal or no progress. Grey indicates actions are not relevant.

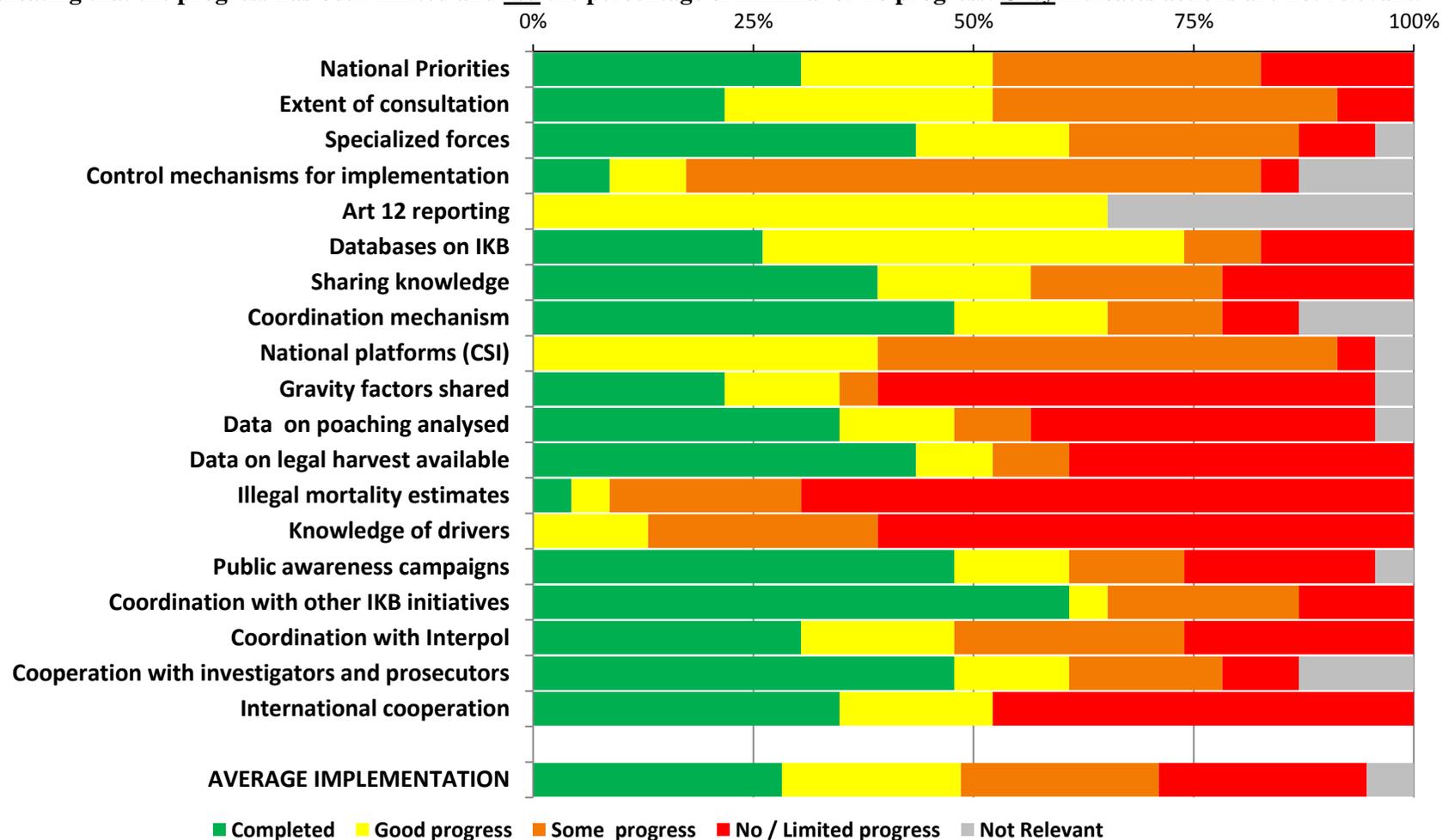


Figure 2 – Areas where further work is required by each Contracting party responding to the questionnaire. 1: Little or no progress, major effort required; 2: Some progress, but no significant progress yet; 3: Good progress but target still not reached; 4: Action completed, no further work required except continuation of on-going work.

	Albania	Armenia	Belgium	Bosnia & Herzegovina	Croatia	Cyprus	Czech Republic	Estonia	France	Georgia	Hungary	Italy	Malta	Monaco	Netherlands	Norway	Poland	Serbia	Slovak Republic	Spain	Sweden	Turkey	United Kingdom
National Priorities	4	1	3	1	3	3	2	1	2	2	4	2	4	2	3	4	1	4	2	4	2	4	3
Extent of consultation	4	1	3	2	3	3	2	3	2	2	3	4	4	1	2	2	2	2	2	3	3	4	4
Specialized forces	2	1	4	2	4	4	2	3	4	3	4	4	4		2	3	1	2	2	4	3	4	4
Control mechanisms for implementation	2	2	2	2	2	4	2	1	2	3	2		3		2	2		2	2	2	2	2	4
Art 12 reporting			3		3	3	3	3	3		3	3	3		3		3		3	3	3		3
Databases on IKB	3	3	3	1	3	4	3	1	4	3	3	3	4	4	3	1	1	2	3	2	3	4	4
Sharing knowledge	1	2	4	1	3	1	2	3	4	2	3	4	4	1	4	4	1	2	4	3	4	2	4
Coordination mechanism	4	1	4		4	4	2	4	4	1	3	2	4		3	4		4	3	3	2	4	4
National platforms (CSI)	2	2	3	1	2	3	2	3	3	2	3	2	2		3	3	2	2	2	2	2	3	3
Gravity factors shared		1	1	1	1	1	3	1	4	3	3	1	4	1	4	2	1	1	1	1	4	1	4
Data on poaching analysed	3	2	4	1	1	4	1	4	4	3	1	2	4		3	4	1	1	1	1	1	4	4
Data on legal harvest available	1	4	4	1	4	3	1	4	4	1	4	2	4	1	1	4	4	1	2	1	4	3	1
Illegal mortality estimates	1	1	2	1	1	1	1	1	1	1	1	1	4	1	3	2	1	1	2	1	2	2	1
Knowledge of drivers	1	1	1	1	1	3	2	1	1	2	2	2	3	1	1	1	1	1	1	1	2	2	3
Public awareness campaigns	2	2	3	2	4	4	3	1	1	1	4	4	4		4	1	1	4	3	4	4	4	4
Coordination with other IKB initiatives	4	2	4	1	4	3	2	4	1	4	4	4	4	4	1	4	2	2	4	4	4	2	4
Coordination with Interpol	1	4	3	1	3	4	3	1	1	1	4	2	1	2	4	4	2	2	2	3	4	2	4
Cooperation with investigators and prosecutors		1	4	1	4	4	2	4	4	2	3	2	4		4	4		4	3	3	2	4	4
International cooperation	1	1	4	1	3	1	1	1	1	1	3	3	4	1	4	4	1	4	4	4	3	1	4
Percentage of implementation	50%	47%	82%	32%	74%	79%	54%	61%	69%	53%	79%	65%	94%	26%	75%	74%	40%	57%	64%	68%	75%	72%	92%