



**VIRGINIJUS SINKEVIČIUS**  
Commissioner for Environment  
Oceans and Fisheries

Brussels, 05 May 2022  
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**The Hon. Clint Camilleri**  
Ministry for Gozo  
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Dear Minister Camilleri,

The Commission has been informed about the adoption of a derogation under Article 9 of the Birds Directive<sup>1</sup> in relation to the spring hunting of the Turtle Dove in Malta (L.N. 116 of 2022, declaration on a Derogation for a 2022 Spring Hunting Season for Turtle Dove and Quail)<sup>2</sup>.

I would like to express my deepest concerns about the adopted derogation.

I recall that it was on the basis of the listing of this species as 'Vulnerable' on the global Red List of birds and of the negative trends observed in the EU that the Maltese Government took the decision to implement a moratorium on spring hunting of the Turtle Dove as from 2017.

These circumstances have not changed<sup>3,4</sup>. There is in fact more evidence showing an ongoing population decline<sup>5</sup>, based on updated scientific data. These worrying developments have led to the recent issuing of a technical recommendation to implement a temporary “zero take” for the Turtle Dove in 2022<sup>6</sup> by the Task Force on the recovery of birds under the sub-expert group on the Nature Directives (NADEG).

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<sup>1</sup> Directive 2009/147/EC on the conservation of wild birds (OJ L 20 of 26.01.2010. p. 7).

<sup>2</sup> <https://legislation.mt/eli/ln/2022/116/eng>

<sup>3</sup> <http://www.iucnredlist.org/details/22690419/0>

<sup>4</sup> <https://nature-art12.eionet.europa.eu/article12/progress?period=1&conclusion=ltbp>

<sup>5</sup> 20220318 Tech. update (Mar 2022) - population model-FINAL Clean.pdf

<sup>6</sup> <https://circabc.europa.eu/ui/group/e21159fc-a026-4045-a47f-9ff1a319e1c5/library/8a5167a0-a5ae-4d76-999a-ecbf947b781f/details> - this technical recommendation applies both to the western flyway and to the central-eastern flyway of the Turtle Dove.

I recall that other Member States<sup>7</sup> have implemented a temporary “zero take” in 2021, based on the technical recommendations expressed last year, notwithstanding the opposition expressed by hunting associations.

A decision of the Maltese Government to grant a derogation allowing spring hunting of the Turtle Dove would go against the above-mentioned technical recommendation and the collective and dedicated efforts of the Commission, Member States and stakeholders to halt the population decline and begin the recovery of the species.

Furthermore, such a derogation would breach several provisions of the Birds Directive as well as the commitments expressed in the EU Biodiversity Strategy for 2030, endorsed by the European Parliament<sup>8</sup> and the Council<sup>9</sup>.

Finally, I recall that Malta is already subject to an infringement procedure for failure to ensure the protection of wild birds and for issuing derogations allowing spring hunting in breach of Article 9 of the Birds Directive<sup>10</sup>.

The above leaves no choice but to take further infringement action and I urge the Maltese authorities to withdraw without delay the spring hunting derogation for the Turtle Dove.

Yours sincerely,



Virginijus Sinkevičius

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<sup>7</sup> In the western flyway of the Turtle Dove.

<sup>8</sup> European Parliament resolution of 9 June 2021 on the EU Biodiversity Strategy for 2030: Bringing nature back into our lives (2020/2273(INI)).

<sup>9</sup> Council Conclusions on Biodiversity - the need for urgent action, 12210/20.

<sup>10</sup> [https://ec.europa.eu/commission/presscorner/detail/en/inf\\_20\\_2142](https://ec.europa.eu/commission/presscorner/detail/en/inf_20_2142)