

Dear Ms. Wallström, dear Dr. Hanley,

We are writing you to express our concerns regarding the attempts to establish a longer hunting season in Italy.

Stretched as it is like a bridge across the Mediterranean, Italy plays a crucial role in the conservation of migratory birds within the EU. The entire country is a bottleneck for migrants and an extremely important destination for huge numbers of wintering birds. The appropriate and sustainable management of migratory birds in Italy therefore has a direct and relevant impact on most of the bird populations living within the EU boundaries and beyond.

It is therefore crucially important for the Commission to ensure a scientifically sound application of the Wild Birds Directive 79/409 in Italy, and especially so when it comes to hunting, an activity which causes so much impact on birds in this country.

The fast-growing community of Italian ornithologists and conservationists welcomes the initiative of the Commission to build up a sound scientific reference database in order to ensure the Directive is properly applied in each of the Member States. The activities of the *Ornis* Committee and Scientific Working Group have in fact raised much interest within the wider Italian scientific community. Many of us were also happy to have had a chance to contribute with our own work to the data referring to Italy.

In this respect, Italian ornithological societies look positively on the quality and detail of the scientific information included in this document, and are also proud of the quality of the information it contains regarding Italy, often above that obtained for other Member States. This further testifies to the efforts of the entire ornithological community in offering the best available information for our country.

It is therefore very disappointing to know that Italian data are being strongly questioned by some hunter Associations with a view to lengthening the hunting season without any consideration for the biology of the species involved.

Even more disappointing is to know that the Commission has already twice accepted to discuss the Italian decades included in the *Ornis* Key Concepts Document. This on the basis of two reports submitted by the Ministero per le Politiche Agricole e Forestali, which were merely speculative and both lacking new scientific data. We leave the Commission to judge the quality of the criticisms proposed in those reports.

In our opinion, the available data clearly suggest that the opening and closing dates of the hunting season in Italy as stated by the Italian law in force n. 157/1992 (third week of September, extendible on request to the 1 September, and 31 of January) represent a compromise between different migration patterns. Many species are already on migration in January. Anyone interested in birds in Italy could confirm the absolute value, in terms of conservation of European birds, derived from a single closing date for hunting at the end of January in Italy, both because of the disturbance caused by hunting and for the weakness of field controls.

We are ready to provide the Commission with any pieces of information which may be required, although we think that Italian data do not require any further updating at the present time. We will, in the meantime, be following in detail this issue and the future steps and positions the Commission takes, and we will do this in direct contact with the Italian scientific community.

Yours sincerely

Roberto Tinarelli

(President of As.O.E.R.)