



Põllumajanduskoda
Estonian Chamber of Agriculture and Commerce



Svenska
lantbruksproducenternas
centralförbund



**FEDERATION OF
SWEDISH FARMERS**



To:

Virginijus Sinkevičius, European Commissioner for Environment, Oceans and Fisheries

The Nordic and Baltic Capitals, 11 June 2021

Subject:

Moving the Barnacle Goose (*Branta leucopsis*) from Appendix II to Appendix III of the Bern Convention and from Annex I to Annex II of the Birds Directive

Dear commissioner Sinkevičius,

As representatives of the Nordic-Baltic agricultural producers, we would like to draw your attention to the growing challenges caused by the rapidly increasing population of the Barnacle Goose (*Branta leucopsis*). The Russia/Germany & Netherlands population migrating through Baltic and Nordic countries has increased by 30 times between 1980s and 2010s. What is more, the population growth continues: the estimated population size may reach 2.4 million by 2023 and between 7.3 and 10.4 million by 2038.¹ Currently, the size of the Russia/Germany & Netherlands population is more than 3.5 times larger than the favorable reference population (FRP) at the level of the whole flyway population.² This development has led to a situation in which the economic and social sustainability of agricultural production are no longer in an acceptable balance with nature protection in the case of the Barnacle Goose.

Damage caused to agriculture by the Barnacle Goose has increased significantly in the recent years due to the rapid population growth. Damage to the fields and growth can be very extensive (e.g. eating, trampling and digging crops and seeds, leaving feces) and what is more, the related problems can also be significant

¹ Jensen, G.H., Madsen, J., Nagy, S., Lewis M. (Compilers) 2018. AEWA International Single Species Management Plan for the Barnacle Goose (*Branta leucopsis*) - Russia/Germany & Netherlands population, East Greenland/Scotland & Ireland population, Svalbard/South-west Scotland population. AEWA Technical Series No. 70. Bonn, Germany.

² Nagy, S., Heldbjerg, H., Jensen, G. H., Johnson, F., Madsen, J., Meyers, E. & Dereliev, S. 2020. [AEWA's adaptive flyway management programme](#) for the Russia/Germany & Netherlands Population of the Barnacle Goose *Branta leucopsis*. FRP represents the situation when the population has exceeded the carrying capacity of the staging areas in the Baltic.

(e.g. difficulties with grazing, risk of diseases, additional workload). Even if there is a national compensation scheme in place, the compensation paid does not cover the real losses in most cases. Despite compensation schemes, if they are fair and functional, are an important balancing element, they are not enough to solve the growing challenges.

- In **Denmark** there is no compensation scheme and thus, there is no official estimate on the damages caused by geese. However, surveys asking farmers what kind of damages they experience from geese show losses ranging from 3 000 € up to 15 000 € per year on a single farm, and farmers experience a steadily increasing amount of damages and conflicts.
- In **Estonia** almost 1.2 million € of agricultural damage caused by geese have been registered in 2020 of which around 40 % has been compensated to farmers. According to the Environmental Board, the scale of damage has increased significantly since 2011: the average size of reported damage has increased from 5 000 € to 10 000 € per producer per year, while the largest damages have reached 60 000 € per year. It is estimated that actual agricultural damage caused by geese is even higher, as many farmers do not register the damages due to the high bureaucracy and the large difference between the amount of damage and the actual maximum compensation (compensation is up to 3 200 € per producer per year).
- In **Finland** the amount of compensation paid for agricultural damage caused by Barnacle Goose has increased significantly during the last four years: around 750 000 € in 2017, around 1.1 million € in 2018, around 1.6 million € in 2019 and finally over 3 million € in 2020. The actual amount of damage is even higher, as compensation only covers part of the damage caused.
- In **Latvia** the damage caused by migratory birds is significant ranging from 300 € to 500 € per hectare. In 2019-2020, almost 2 million € in compensation was paid for agricultural damage caused by geese. However, real losses were about 15 million € and damage was caused also by the Barnacle Goose.
- In **Lithuania**, according to the preliminary assessment provided in 2006, the area of land used by birds amounted to 91 200 hectares, and the economic damage amounted to about 3.5 million €. The Wildlife Act stipulates that farmers are only compensated for damage caused by strictly protected species. Geese and swans are not included in the list of strictly protected species.
- In **Sweden** the official barnacle goose damage in 2019 was 1 792 000 SEK, about 180 000 €. The cost for 2020 is not known due to delayed reporting.

Possibilities to prevent and minimize the agricultural damage are significantly restricted because Barnacle Goose is a strictly protected species based on the provisions of the Bern Convention (The Convention on the Conservation of European Wildlife and Natural Habitats) and the Birds Directive. Due to this strict legal protection status, the deliberate killing and disturbance of birds is prohibited unless a derogation is granted. The reasons for derogating are similarly defined in the provisions of the Bern Convention and the Birds Directive.

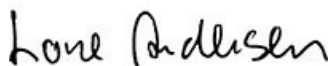
To ensure an acceptable balance between different pillars of sustainability and to promote conflict-free coexistence between the Barnacle Goose and agricultural producers, it is highly necessary to effectively address and ease the conflicts caused by the strict protection of the species. This requires a change in the legal protection status of the Barnacle Goose in both the Bern Convention and the Birds Directive. Moving the Barnacle Goose from Appendix II (strictly protected fauna species) to Appendix III (protected fauna species but regulation is possible) of the Bern Convention and from Annex I (species subject of special conservation measures concerning their habitat, i.e. designation of Special Protection Areas) to Annex II (hunnable species) of the Birds Directive would offer better possibilities to manage and control the species and to minimize the damage without bureaucratic derogation procedures.

The lower level of protection is justified from all different viewpoints. From the conservation point of view, the species no longer requires strict protection and thus, the current legal protection status does not reflect the real situation of the species. The species is not at risk since the IUCN Red List status is Least Concern and the population trend is increasing. Thus, the current situation is dramatically different compared to the times when the Bern Convention and the Birds Directive entered into force. According to the Article 2 of the Bern Convention and the Article 2 of the Birds Directive, also economic interests are to be considered when taking requisite measures for the benefit of species. From the economic and social perspective, the current strict legal protection status is unproportionate.

Finally, we would like to point out that in addition to lowering the legal protection status of Barnacle Goose, continued action is needed to improve the international cooperation across borders of impacted countries through the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) Goose Management Platform. The platform has an adaptive approach to goose management that appears to be a useful way to resolve conflicts between geese and other interests, including agriculture.

We would like to hear your view on the European Commission's future actions on this issue. We hope that our concerns will be granted for your full consideration. We remain expectant that the Commission will have a responsive position towards the necessary changes and promotes sustainable solutions through its own actions.

Yours sincerely,



Lone Andersen, Vice-Chairman
Danish Agriculture & Food Council



Roomet Sõrmus, Chairman of the Board
Estonian Chamber of Agriculture and Commerce



Juha Marttila, President
The Central Union of Agricultural Producers and
Forest Owners (MTK), Finland



Mats Nylund, President
SLC - The Central Union of Swedish-speaking
Agricultural Producers in Finland



Maira Dzelzkalēja-Burmistre, Deputy Chair of the Board
Union "Farmers Parliament", Latvia



Petras Puskunigis, President
Lithuanian Association of Agricultural Companies



Raimundas Juknevičius, President
Lithuanian Farmers' Union



Palle Borgström, President
Federation of Swedish Farmers – LRF

Cc:

Minister of Environment Lea Wermelin, Denmark

Minister of the Environment Tõnis Mölder, Estonia

Minister of the Environment and Climate Change Krista Mikkonen, Finland

Minister of Agriculture and Forestry Jari Leppä, Finland

Minister of Agriculture Kaspars Gerhards, Latvia

Minister of Environmental Protection and Regional Development Toms Arturs Pless, Latvia

Minister of Environment Simonas Gentvilas, Lithuania

Minister of Agriculture Kęstutis Navickas, Lithuania

Minister for Rural Affairs Jennie Nilsson, Sweden

State Secretary Per Callenberg, Sweden