



**Response to Public Consultation Exercise regarding a
Proposed Amendment of the Conservation of Wild Birds
(Amendment no 2) Regulations**

Document presented to the Wild Birds Regulation Unit within the
Ministry for Sustainable Development, Environment and Climate Change

December 2015

PREAMBLE

On the 13th November 2015, the Wild Birds Regulation Unit published a draft of proposed amendments to the Conservation of Wild Birds Regulations, which amendments introduce a number of fundamental changes to wild bird protection regulations. In the opinion of BirdLife Malta, should such regulations be implemented these will have negative consequences to the protection of wild birds in Malta as well as elsewhere.

In reaction to a call for public consultation, also published on the Ministry of Social Dialogue website, the following document has been compiled to inform all concerned authorities, as well as personally the Parliamentary Secretary in charge, of the implications of these proposed amendments, so as to truly ensure that any amendments done to these regulations benefit the protection of wild birds rather than impede it.

We trust this document will be taken into consideration as is demanded by the public consultation exercise, and that regulation amendments are carried out sensibly in the sole interest of ensuring better enforcement and better protection of wild birds.

1.0 Introduction

BirdLife Malta welcomes any open consultation exercises concerning matters that may affect the conservation and protection of wild birds and their habitats. It further notes the intention by government to consult on the latest proposed amendments to Conservation of Wild Birds Regulations, a markedly different approach to a similar exercise made in August 2015, where a substantial amount of amendments to the Conservation of Wild Bird Regulations were carried out without any form of public consultation as required by law.

We understand that for various reasons, the WBRU wishes to amend a number of regulations concerning wild birds, particularly pertaining to self-reporting obligations, licence systems, taxidermy and possession of birds not naturally occurring within the European Union. We further note that the intention is to have the majority of these amendments effective soon after the consultation exercise is finished, with the introduction of the new licence and reporting systems as of the 15th February 2016.

While again we reiterate that an open consultation approach is to be commended, we trust that the consultation exercise has the intention to seriously consider the concerns and suggestions made by all relevant stakeholders, and that in particular the spirit of any amendments done to the Conservation of Wild Birds Regulations is for the ultimate aim of ensuring a better protection of wild birds, while also controlling those activities such as international and internal trade, hunting, trapping and taxidermy which may be detrimental to wild bird populations and that may be carried out as long as these can be sustainable.

We have read carefully the proposed amendments and would like to submit to the attention of the Parliamentary Secretary of Agriculture, Fisheries and Animal Welfare, also in charge of the Wild Birds Regulation Unit, our concerns and comments regarding these amendments.

It is very much hoped that the consultation exercise has attracted various contributions, not the least from the Malta Police Force, which through especially the functions of the Administrative Law Enforcement Unit, is primarily in charge of enforcing these regulations, and is also well aware of the shortcomings of the current legislation and enforcement difficulties the police force encounters on a daily basis in executing its duties to guarantee the protection of wild birds. We look forward to also receiving any response from the Malta Police Force in due course, of its recommendations as well as contributions to the drafting of these amendments.

In the following section (Section 2.0) we provide a point by point analysis and understanding of the changes being proposed, while in Section 3.0 we provide our conclusions and observations in reaction to the proposed amendments.

2.0 An understanding of the proposed amendments

Reference in proposed amendment	Subject	What is being proposed	Implications	BirdLife Malta position
1	General title	n/a	n/a	n/a
2	Carnet De Chasse	Substitutes all definitions of Carnet De Chasse as a General Licence	May leave some ambiguities in the wording of the legislation	Comments regarding Carnet De Chasse system made further on in this document
3	Carnet De Chasse	Practically removes all definitions to Carnet De Chasse	No impact on bird conservation provided that the Carnet de Chasse system is replaced by a more reliable method of game recording.	The removal of the already doubtful Carnet De Chasse system should be substituted by a system which is first trialled and proven to be effective, rather than haphazardly removed from being a requirement within the law. WBRU have to date not communicated whether a trial system will be set in place in the interim period a new system may be adopted.
4 (a)	Regulatory framework concerning non-European territory birds	Removes the obligation to provide documentary evidence proving legitimate acquisition of live or dead birds not found as naturally occurring in Europe but imported into the country;	<p>Non-EU territory birds invariably includes thousands of species that are protected in their country of origin but which are also illegally acquired and smuggled into Malta to end up as pets or in stuffed bird collections. This proposed amendment removes the obligation of holders of live or dead non-European birds to prove that (a) the specimen was legally imported from a non-EU state or (b) legally acquired from an EU state or (c) it was captive bred.</p> <p>As a result of this amendment, it will be impossible for enforcement officials to determine whether a bird which is not naturally occurring within the EU held in someone's possession was legitimately acquired or not – It removes the onus of proving whether a non-European bird was legitimately acquisitioned or</p>	Paragraphs (f) and (g) of sub-regulation 1 of regulation 4 of principal regulations should not be removed so as to maintain the existing safeguard regarding the importation, possession and acquisition of non-European birds. The importation of specimens illegally shot outside Europe is already a matter of poor control which this amendment will be simply liberalizing without legal consequences. Such a measure will encourage the importation of specimens illegally killed in the country of origin, and will practically guarantee no legal action may be taken should the person doing this illegal act manage to evade law enforcement at the country of origin. It will also encourage the respective sales of these specimens since any ownership of these specimens will no longer require appropriate documentation.

Reference in proposed amendment	Subject	What is being proposed	Implications	BirdLife Malta position
			otherwise	
4 (b)	Regulatory framework concerning non-European territory birds	Removes the requirement for persons in possession of these non-European birds to prove legal acquisition by means of licences, permits, certificates or other documents that may be used as proof by WBRU	Guarantees that anyone importing or in possession of non-European birds does not require to produce any documentary evidence of their legal acquisition	This amendment should not be done as there is no reason to remove this proviso. This amendment makes enforcement impossible and gives protection to law breakers.
4 (c)	Regulatory framework concerning non-European territory birds	Removes the obligation to request authorization from WBRU for the transfer or disposal of non-European bird specimens	This amendment aims at removing the obligation of a collector to request a permit to transfer ownership or dispose of a protected non-EU territory bird. The provision as it is in force today is particularly important in cases of transfer of ownership of stuffed protected non-EU territory birds as it ensures traceability of ownership of protected birds. Removing this provision will give rise to lack of traceability of such stuffed specimens. This means that, coupled with the proposal in these same regulations to remove the obligations of proving the legitimate acquisition of protected non-EU territory birds, will bring about a free for all situation of acquiring, trading & swapping of stuffed protected birds.	This amendment should not be done as it absolves the Wild Birds Regulation Unit from any responsibility to authorize the transfer of ownerships of bird specimens. As with the above-mentioned proposed amendments, this amendment only serves to make enforcement impossible and to provide immunity from prosecution to protected bird smugglers, dealers and collectors.
5.	Regulatory framework concerning non-European territory birds	Removes the obligation to retain in possession any permit, certificate or other documentation that prove legal acquisition of a non-European territory bird, whether dead or alive.	This amendment aims to remove the obligation that holders of protected non-EU territory birds need to keep in their possession documentary evidence that proves that a particular non-EU specimen was legally acquired from the country of origin. By removing the obligation to prove a legal acquisition of non-European birds, this amendment is leading to a free for all situation	The proposed amendment should not be done as it makes it impossible to enforce the acquisition and importation of wild birds which may originate from outside Europe. This amendment will provide protection to bird smugglers, keepers, traders and collectors and no enforcement action may be taken against them as a result of this.

Reference in proposed amendment	Subject	What is being proposed	Implications	BirdLife Malta position
			with possession of non-European birds for which no documentary evidence shall be longer required	
6 (a)	Regulations concerning the acquisition of a hunting licence	<p>Removes the following conditions that allow the issue of a hunting licence:</p> <p>(i) No need to return the yearly hunting licence permit;</p> <p>(ii) No need to pay administrative penalties or arrears</p> <p>(iii) No need to return Carnet De Chasse within 10 days of closure of the season</p> <p>Introduces a possibility of an examination before issuing a licence and a possibility of not granting a licence to those who fail the test</p>	<p>Various obligations by hunters that ensure compliance and responsibility in the return of carnet de chasse, or to pay administrative fines before a licence can be renewed are being waived. This makes control of licences difficult.</p> <p>For a person to acquire a hunting or a trapping licence such person has to sit for an examination designed to test his knowledge of the regulations governing hunting & trapping activity and his bird identification skills. According to the proposed amendment the Wild Birds Regulation Unit may decide not to issue a licence to those who fail this examination. The fact that the term "may" is being used means that the Wild Birds Regulation Unit may also decide to issue a licence to a person who would have failed his test. This means that notwithstanding the testing procedure, licences would be granted at the Wild Birds Regulation Unit's whims, leaving sufficient room for abuse of power, in particular by granting licences to those who would have failed the test.</p>	<p>This amendment should not be done as it empowers WBRU to issue licences at its discretion without clear obligation of hunters to sit for examinations (proving bird identification skills for e.g.) or in the case of applicants who sit for the test but fail, WBRU may still issue a licence. It also absolves licence holders to even respect fundamental aspects such as the return of carnet chasse and the payment of administrative fines.</p> <p>This amendment leaves room for abuse of power as well as discrimination over who is granted a hunting licence.</p>
6 (b)	Regulations concerning the acquisition of a hunting licence	Introduced the possibility for one to appeal to the Ornithology Committee in case WBRU decides not to renew a license	None of consequence to bird conservation	N/A
7 (a)	Regulations concerning hunting licence	Changes definition of permit to hunt and take birds to 'general licence'	None	N/A

Reference in proposed amendment	Subject	What is being proposed	Implications	BirdLife Malta position
7 (b)	Regulations concerning licences	Removes yearly obligations such as handling the permit within 10days of closure of season, as well as yearly licence fees	The current system of Carnet De Chasse and licence renewals already suffers from a proportion of licencees who do not comply. Removing this yearly obligation may make reporting less of an obligation with consequences to WBRU's reporting on hunting seasons and derogations	BirdLife Malta is not convinced that any electronic system being put in place by WBRU will improve reporting by hunting licence holders
7 (c)	Regulations concerning licences and carnet de chasse	Removes the carnet de chasse booklet;	As above	If WBRU are proposing any new reporting system this should be enshrined in legislation and not simply removed.
7 (d)	Regulations concerning licences and carnet de chasse	Introduces a 5-year renewal system for licences, and a new game reporting system (no details)	A 5-year licence renewal system relaxes the whole regime of licence applications and reporting obligations associated with it. This includes conditions such as a licence is not renewed if a licence holder does not report his carnet de chasse. It is unclear how this system is enforced, especially in consideration that as per above mentioned amendments licence renewals will be at the sole discretion of WBRU without an obligatory need to make examinations for example	The one-year licence system should be kept and improved upon. If WBRU are introducing a new game reporting system this should at the very least be trialled along with the old Carnet De Chasse system and not simply introduced out rightly with a 5-year interval in renewing a licence should a licence holder decide not to report his catches.
8	Regulations concerning reporting obligations vs licence renewals	Removes obligations of game reporting as a condition for licence renewal, and simply keeps the payment of fines as a condition	Removing game reporting obligations will weaken the whole system of Carnet De Chasse reports which were enforceable up to now with conditions of non-licence renewal as well as a 500 Euro fine for the non-return of Carnet De Chasse booklets.	Removal of game reporting obligations as a condition for licence renewal will weaken any reporting or record-keeping of hunting effort on the Maltese Islands. If any new reporting system will simply rely on checks done by police and on self-reporting trust, the system will inevitably fail. Reporting obligations should be maintained on a yearly basis and as a condition of licence renewal to encourage better self-reporting.
9 (a)	Regulations concerning taxidermy	Removes the need to be in possession of documentary evidence proving legal acquisition of stuffed non-EU territory birds	This proposal aims at removing the obligation of holders of stuffed non-EU territory birds to also keep in their possession and until such time that the specimen is in their possession, all documentary evidence required to prove the specimen's legal acquisition.	This amendment allows anyone in Malta to stuff or mount any non-European bird. Further to a law amendment done in August 2015, this practically allows a free for all situation for any person to stuff or mount any game bird or birds that are originating from outside EU, without even the need to produce documentation to prove it (as a result of above mentioned

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			<p>This effectively means that a collector of stuffed protected non-EU territory birds will no longer be obliged to provide the documentary evidence proving legal acquisition. This amendment, in conjunction with the other proposed amendments is simply intended to negatively impact the capacity to enforce the law and to create a situation whereby the successful smuggling, taxidermy, collecting and trade in protected non-EU birds can safely take place in an environment where law breakers are provided protection from prosecution.</p>	<p>amendments).</p>
9 (b)	Regulations concerning taxidermy	<p>Removes the consideration of other applicable law when it comes to determining that bird collections are legitimate or otherwise</p> <p>Provides immunity to those collectors that have declared their stuffed birds by May 2013, but may still have birds that do not carry identification tags (even if these may have been inspected)</p>	<p>Holders of stuffed protected birds were legally obliged by law to declare their collections in 1997 and in 2003 (amnesties). The authorities were in turn obliged to register their collections by identifying the specimens comprising the collection, physically marking them with a tag and issuing the certificate identifying the specimen and the corresponding tag. Anyone who would have had his declaration registered would be afforded immunity under the Conservation of Wild Birds Regulations.</p> <p>The proposed amendment has two impacts as follows:</p> <p>(a) By removing that part in the regulations establishing that such an amnesty was being granted without prejudice to any other law means that the amnesty will now also be applicable to other laws if the possession of such a specimen is in breach of regulations other than the Conservation of Wild Birds</p>	<p>This amendments masks practically an amnesty this time being provided free of charge and actually legitimizes persons who did not take the opportunity provided in 2003 to register their birds, to now be able to still hold on to unchecked specimens without getting any legal action. It also provides immunity from any other applicable law concerning the possession of birds which possession may be in violation of other legislation.</p> <p>This amendment is an outright violation of conservation of wild birds regulations and prizes those individuals who have flouted the law in the past and continued collecting protected wild bird species following the 2003 amnesty.</p> <p>Taxidermy is the one major motivation behind the problem of illegal killing of birds in Malta, particularly the problem of collections that were declared in 2003 and remain unchecked to date. This amendment practically provides a blanket cover to those individuals who acted accordingly and provides immunity to them from enforcement.</p>

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			<p>Regulations.</p> <p>(b) By introducing a provision allowing for the keeping of a bird collection that would have only been inspected but not subsequently tagged by the Wild Birds Regulation Unit, will result in the collection never requiring to be tagged because from the date of inspection onwards it would be deemed as perfectly legitimate. This means that the stuffed birds registration process which requires that the specimens first be identified, then physically marked with a security seal and then subsequently issued with certification would have been completely undermined.</p>	
10	Regulations on lead shot size restrictions	Introduces a proviso for persons to be able to use lead shot greater than 3.3mm if so permitted by the Commissioner of Police	None apparent as long as these are not permitted to hunting licence holders	WBRU should make clear the reason why this amendment is being introduced
11	Regulations concerning fines and penalties given in court	Removes the clause obliging court to issue the highest penalties for whatever offence may involve species listed under Schedule I (Annex 1 of Birds Directive) or Schedule IX; the only exception applies to those that are caught 'hunting or attempting to hunt' or 'taking or attempting to take'	<p>Schedule I species are those transposed from Annex I of the Birds Directive. Schedule IX species are what are so called charismatic species – a list introduced by WBRU giving further protection to highly sought species.</p> <p>This amendment aims at removing the harsh penalties applicable in case of any offences involving Schedule I and Schedule IX birds, other than in cases whereby the offence is strictly the actual act of shooting or attempting to shoot the bird.</p> <p>This means that anyone apprehended in</p>	<p>This amendment practically provides immunity from the harshest penalties to those who may be found in possession of Schedule I and IX birds and for which the act of hunting and trapping cannot be proven.</p> <p>In other words, this amendment provides immunity from the harshest of penalties to those who may especially in the past hunted such protected birds and which are now part of collections. It also provides immunity from harsh penalties to those persons who may in future hunt these protected species but are not caught in the act by enforcement authorities. Accordingly if the bird is found in one's possession during later inspections, the harsh penalties cannot be inflicted.</p>

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			<p>possession of a Schedule I or Schedule IX bird, alive or dead (even if freshly shot), in whole or in part such as in the form of skins to be stuffed or in the form of a stuffed bird; or who would have been apprehended in the act of hiding, stuffing, smuggling, trading or transporting for sale a Schedule I or Schedule IX bird would not qualify anymore for the harsh penalties.</p> <p>The immediate impact of the proposed amendment would be that offenders, strictly other than those who would have been apprehended by the Police shooting at a Schedule I or Schedule IX bird, would instead qualify for those penalties under regulation 27 (3) which effectively means a reduction by half of the maximum fines; no permanent revocation of the licence; and the reduction of a minimum of 6 months imprisonment to nil.</p>	
12	Introduces a new regulation concerning the creation of a 'Conservation of Wild Birds Fund'	Introduces a cash-revenue approach to finance WBRU activities or initiatives that may include NGO activities on the basis of funds, donations as well as fines and penalties	Provides a funding source for WBRU and any activities it may decide to fund or finance	BirdLife Malta supports initiatives concerning funding conservation however reserves its right to comment on this at a later stage when such a system may be implemented.
13	Introduces the new reporting obligations replacing the Carnet De Chasse system	Nothing much being proposed than this will be a system managed by WBRU	Unknown given that WBRU has not really publicized how and in what manner this reporting system will be implemented.	The Carnet De Chasse system has had a history of being accepted eventually by the hunting community with already gross limitations and problems of under-reporting. BirdLife Malta is still not convinced with what new system will be put in place and recommends that before legislative changes are made to abolish the Carnet De Chasse system, the proposed reporting system are thoroughly tested and double checked, while

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				keeping the old system as a bare minimum of reporting.
14	New licence conditions	Introduces new licence conditions without much detail	New licence conditions correctly include provisions of payments of fines and reporting obligations however is very vague on these provisions especially reporting obligations and what is to be reported	Reporting obligations are too vague and may not be enforceable. WBRU has to date still not revealed in full what the new reporting system shall be and what checks will be in place to ensure this is adhered to.
15	Administrative fines	Amends wording in relation to above changes in licence and reporting system	In absence of details of reporting system being put in place, it appears there are less penalties and offences related to non-compliance with reporting	As per above
16	Licence fees	Introduces 5-year system of licence with net decrease in revenue	Introduces a 5-year renewal of licences system at a rate of 50 Euro per licence. This contrasts with a 20 Euro per year licence system and accordingly provides a discount of 50 euro per licence over the proposed five year period in comparison with current provisions	BirdLife Malta does not agree with having a 5-year licence system as it makes it more difficult more WBRU to impose licence reporting conditions as well as control over the amount of hunting licences.
17	Timeframes for effective implementation of proposed legislation	All amendments concerning non-EU birds, taxidermy, lead-shot, amnesty and 5-year licence system to be effective immediately. Regulations concerning new reporting system to be in effect as of the 15 th February 2016	Various as above	Various as above

3.0 Conclusion

BirdLife Malta would like to express its concerns that the above proposed amendments to the conservation of wild bird regulations shall be in their majority a detriment to the conservation of wild birds, shall weaken enforcement to the benefit of law-breakers, as well as shall provide immunity from law enforcement to the prime driver of illegal killing of wild birds – that of taxidermy of birds illegally killed in Malta or elsewhere.

In summary, the legal jargon that makes up the proposed amendment (No 2) of 2015 to the conservation of wild birds regulations translates to the following proposals:

- a. **A removal of the Carnet De Chasse system that shall be substituted by a so-called 'game reporting system' which details are not included in the proposed amendments and which leaves it as a very vague exercise to be undertaken by the WBRU.** While our opinion of the Carnet De Chasse system and its problems of under-reporting are widely known and have often been publicised, we fail to imagine that a new system haphazardly introduced in 2016, in total replacement of a system that has taken years to be assimilated and somehow followed by hunters, will somehow translate into a more reliable system. It has to be reminded that the reporting of hunting statistics needs to be done as accurately as possible, for the country to be able to apply respective derogations. This is an aspect which Malta has failed to perform diligently. It is not yet known whether the new reporting system will entirely rely on spot checks carried out by enforcement officials to prove that it is being adhered to, especially given that five years may elapse before a licence renewal will be required. The WBRU should at the very least trial a new system while the old system is in place so as to make sure that any reporting which results from the Carnet De Chasse system is consistent with past reporting mechanisms. WBRU should also make clear to all what the new reporting system shall entail, and this system should be well specified in all its details in the law so as to make its application and enforcement clear.
- b. **A complete liberalisation of the importation, possession and taxidermy of dead and live protected birds that originate from outside the European Union.** This measure is nothing else but a move to legitimise an already sticking point in the fight against the illegal killing of protected birds, that of taxidermy. Taxidermy of protected species to date remains the driving force behind illegal hunting locally as well as in more recent years, outside the country. It is a known fact that nowadays various hunting trips are undertaken in South America, Africa as well as South-East Asia via which various Maltese hunters illegally import specimens from these countries. Every so often, when checks are made, imported goods turn out to have carcasses of birds protected at their country of origin, and this particular amendment will simply legitimise these practices.

This amendment is completely irresponsible of authorities such as the WBRU who have a duty in ensuring that illegal hunting is not extended or even indirectly promoted to other countries, but is contained and well controlled in the Maltese Islands. Amendments to these laws include the removal of any obligation to carry or provide documentation proving legitimate acquisition, as well as absolves the WBRU from its duty in guaranteeing such. It provides a free for all situation to bird smugglers, keepers, traders and collectors who as a result of this amendment will not need to prove any legal acquisition of these specimens imported to Malta.

- c. **Any birds found in a collection will be legitimised as long as these are listed in any of the declarations submitted in 1997-1998 or in the 2003 amnesty declarations without the need for the birds to be physically tagged and without the need for final documentary certification.** Any birds found in a collection will be legitimised, as long as these are listed in any of the declarations submitted in 1997-1998 or in the 2003 amnesty declarations, without the need for the birds to be physically tagged and without the need for final documentary certification. On one hand the regulations establish a procedure on how the registration process is carried out, in particular, first starting with the acceptance of the declarations submitted prior to 2003, then with the physical checking of the specimens in the collection in order to confirm that these taxonomically correspond

to those in the declarations, then with the physical marking of the specimens with a tag and finally with the issue of a certificate detailing the specimens in question. On the other hand **the proposed amendments are waiving the requirements to have the specimens tagged and the final certificate issued** if during the course of an inspection by the Wild Birds Regulation Unit the specimens in a collection are simply found to taxonomically correspond to the species in the declaration. The latest amendment simply defeats the whole purpose of the registration process. This will invariably give rise to abuse as **any collector who would have had his collection inspected would subsequent to the inspection, be free to substitute specimens in his collection with others as the obligation to have his specimens physically tagged would have been waived**. Also, collectors who would have had their collection inspected but not tagged will now be able to claim that “no action” can be taken in their regard as their collection has already been inspected irrespective of the fact that the specimens would have been swapped.

- d. Decreased penalties for those in possession of highly protected species.** The amendment is removing the high penalties introduced in the past two years in relation to several illegal activities involving highly protected species (Schedule I and Schedule IX) including, but not solely limited to, the illegal importation, trade, sale or transport for sale, and possession of these species, leaving such penalties only applicable to those strictly caught hunting or attempting to hunt species on this list. This means that if a bird is illegally killed in Malta and the culprit is not caught red-handed, but his prized bird is found in subsequent inspections, the highest regime of fines will not be applicable.
- e. A substitution of yearly hunting licence renewals with a five-yearly licence renewal system along with an abdication of various responsibilities of self-reporting associated with the one-year licence system.** In our opinion such a measure shall weaken the control exerted by the Wild Birds Regulation Unit of hunting licences and their renewals, along with any associated statistics that are collected on a yearly basis from hunting licences and carnet de chasse reports. WBRU has over the past years increased its staff capacity and if anything now should be able to exert more control over the license-return and renewal system. We fail to see how a five-year licence system is helping enforcement as well as the conservation of wild birds.
- f. WBRU will be at its own discretion issuing, renewing or revoking licences.** Amendments concerning hunting licences do not specify the conditions on the basis of which a hunting licence may be renewed or revoked other than vague references to the payment of fines or abiding to reporting obligations, whatever these might be. New licence applicants are not legally obliged to sit for an examination and the award of a licence is at the discretion of the WBRU, irrespective of whether an examination is carried out or otherwise or irrespective of whether the applicant passes or fails the test. We have already clearly expressed our concerns regarding the manner in which WBRU has been set up as well as the staff currently making up the unit. Issuing licences at one's own discretion shall lead to a situation of undoubtful conflict of interest

In BirdLife Malta's opinion, the amendments to the conservation of wild birds regulations being proposed should be permanently revoked and not considered. Should these amendments come into effect, these will not be benefiting the conservation of wild birds but will be practically supporting and encouraging law breaking and the persecution of protected birds in Malta, Europe as well as outside Europe. Amendments concerning taxidermy shall be of benefit to collectors of illegal specimens of wild birds and shall further promote this growing business of hunting trips outside the Maltese Islands in countries where law enforcement might not be that effective. It will further provide immunity to those who have successfully dared to import specimens illegally hunted elsewhere and accordingly these amendments will prize rather than punish these illegal acts.

For the above reasons, we appeal to MSDEC to refrain from approving these amendments, and demand WBRU to reconsider such amendments to ensure that any changes to the conservation of wild birds regulations are of benefit to law enforcement and a guarantee of protection for wild birds irrespective of their origin.

While taxidermy is inarguably the driving force behind illegal killing, there are various venues WBRU can adopt to be in control of what collections are in Malta, and what has been legally registered or otherwise. Unfortunately granting protection or immunity, or even worse providing a scapegoat to those who wish to pursue this illicit practice abroad, shows that WBRU is not willing to do what it may require to curtail abuses.

We completely do not support these amendments, and trust that some common sense shall prevail in abstaining from approving these amendments any further. We appeal to both the Prime Minister as well as the Minister for Environment to not approve the proposed legal notice.

ENDS