



THE VOICE OF EUROPEAN HUNTERS

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Mr. Grzegorz Puda, Agriculture and Rural Development – Minister
cc.: **Mr. Michał Kurtyka**, Climate and Environment – Minister
Mr. Edward Siarka, Government Plenipotentiary for Forestry and Hunting

Subject: Bow hunting as a key tool for African Swine Fever eradication in Poland

Dear Mr. Puda,

FACE, the European Federation for Hunting and Conservation, representing Europe's national hunting associations in 36 countries (comprising of 7 million hunters), is closely monitoring the current African Swine Fever (ASF) situation in Europe and the management methods deployed to effectively deal with the disease. As more European countries are introducing hunting with bow and arrow, it is worth underlining that bow hunting is playing an important role in managing wild boar in many situations unsuitable for firearms.

Indeed, bow hunting is successfully used in modern wildlife management to regulate wild boars, which adopt to suburban living conditions and cause danger to people and the environment through damages to the habitat, crops or spreading of diseases. Bow hunting has, therefore, role to play in the reduction of wild boar populations as a part of successful ASF eradication programs.

An excellent example of bow hunting as a modern wildlife management tool is the successful cooperation between the Service of Forest Species, the Bow Hunting Controllers of Madrid's Hunting Federation (SCAES-FMC) and Madrid's Environmental Agency (MEA) – to curb the proliferation of wild boar populations in Madrid¹. As volunteers Polish bow hunters (members of the Polish Bowhunting Association) could also play a major role in regulating wild boars in diverse Polish peri-urban forests and urban areas.

Another useful example is the successful project undertaken the members of the Alsatian Bow hunting federation (ACABR) and the German Bowhunting Association (DBJV) to manage Nutria (*Myocastor coypus*) in a region on the French-German boarder: <https://www.face.eu/2020/12/face-biodiversity-manifesto-project-of-the-month-bowhunting-coalition-assists-control-of-invasive-nutria-in-cities/>

Aside from this, bow hunting is a sustainable form of hunting, which contributes to wildlife management, including the prevention of game damages and animal diseases. It is already practiced in number of EU Member States such as Denmark, France, Spain, Portugal, Italy, Hungary, Finland, Bulgaria, Slovakia and

¹ Report on security when regulating and selective bow culling of wild boar and other game species as required by Madrid Environmental Agency and applied in five urban municipalities and two wildlife sanctuaries of Madrid Autonomic Community.

Estonia². As far as the European and international laws are concerned, the EU Habitats Directive³, the EU Birds Directive⁴ and the Bern Convention⁵ do not prevent European countries from allowing the use of hunting with a bow and arrow. This hunting method is explicitly recognized by the Council of Europe's Charter on Hunting and Biodiversity⁶.

FACE regards bow hunting as an equivalent alternative to hunting with firearms with its own characteristics⁷. Hunting with a firearm or a bow are placed on the same level as they comply with the two factors that enable a responsible shot. They are accurate and possess enough energy to take a lethal shot contrary to the prejudice of what some people still believe. It has been repeatedly demonstrated that a hunter with training and proper equipment can place a hunting arrow with sufficient energy and penetration for a lethal shot, corresponding to high animal welfare standards.

In light of the above considerations, we strongly encourage you to consider the possibility of using the experience of Polish bow hunters in counteracting a dangerous epizootic threat of ASF.

FACE remains at your disposal, should you need further information.

Yours sincerely,



Dr. David Scallan

Secretary General

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² [Nations – European Bowhunting Federation](#)

³ Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, more specifically Annex VI of that Directive.

⁴ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds, more specifically Annex IV of that Directive.

⁵ Convention on the Conservation of European Wildlife and Natural Habitats, specifically Appendix IV of that Convention.

⁶ European Charter on Hunting and Biodiversity, Adopted at the 27th Meeting of the Standing Committee of the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention), 29 November 2007 (Strasbourg, France)

⁷ FACE official position on bow hunting available at <https://www.face.eu/wp-content/uploads/2020/09/EN-FACE-position-on-bow-hunting.pdf>. The position is the result of a close collaboration with the European Bowhunting Federation (EBF).