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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
45th meeting
Strasbourg, 8-12 December 2025

Bureau of the Standing Committee
8-10 April 2025
Strasbourg

Complaint on Stand-by: 2021/6

**Conservation of the Western hazel grouse (*Tetrastes
bonasia rhenana*) (France)**

- REPORT BY THE COMPLAINANT -

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Naturschutz und Umweltbildung e. V.
gegründet 1840

Nach § 60 Bundesnaturschutzgesetz anerkannte Landespflegeorganisation
in Rheinland-Pfalz
Vereinsname nach Dr. Johann Adam Pollich (1741-1780), Arzt und Botaniker
aus Kaiserslautern

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Complaint n° 2021/6: France: conservation de la Gêlinotte des bois (*Tetrastes bonasia rhenana*)

Update for the T-PVS Bureau meeting, spring 205

Luxembourg, 17. January 2025

Dear Madam or Sir,

despite the requests by the Council of Europe regarding complaint 2021/06 concerning the endemic subspecies *T. b. rhenana* of the hazel grouse the past year saw hardly any activity due to the passivity of the French authorities.

After two requests by the Bureau of the Berne Convention and repeated reminders by the complainants, a videoconference was convened on the 27/11/2024 by the DREAL Grand Est. We note that this meeting only took place with overall more than one year delay. This delay wasted precious time, preventing effective conservation action during 2024. The online meeting was attended by the two complaining NGOs as well as representatives of the French government and the Région Grand-Est.

During the meeting Dr. G. Jacob of the University of Fribourg (CH) presented again his genetic study, which had been communicated already in DREAL's first videoconference with the stakeholders in the year 2020, and whose results for hazel grouse taxonomy had been communicated by the DREAL to the COE as an argument against accepting the subspecies *T. b. rhenana*. Dr. Jacob presented no new molecular data, but as a novelty a profound reinterpretation of the previous conclusions, namely the different statement that the sparse DNA data on single hazel grouse from the Vosges and for comparison from elsewhere lacked the scientific power to comment on the validity of subspecies in hazel grouse, and specifically on the subspecies *T. b. rhenana*. This withdrawal of the previous conclusions was, correctly, justified by the lack of statistically significant markers not influenced by hypervariability of the few sequenced individuals. A more pertinent, deeper genetic study was not announced, and therefore the previous claims by DREAL to the COE concerning "scientific tests if the endemic subspecies would exist" have become obsolete. Nobody objected to this final evaluation of this DNA study, which now, after prior dissent, agrees with the unisono consensus of the international scientific community, and the listing of *T. b. rhenana* on the recommended taxonomic list issued by

the relevant commission of the Deutsche Ornithologische Gesellschaft for taxonomy to standardize the systematics of birds in Central Europe.

Furthermore, DREAL presented a conservation plan for the hazel grouse and its habitats in the Vosges - however, apparently not in its final version. The complainants pointed out that while habitat management remains a critical factor for hazel grouse survival in general, even a thorough implementation of these measures at once (and any other in situ actions such as predator control) would take years to become effective and thus come too late given the very few birds remaining (see Pfeffer *et al.*, 2022). This latter remark met with no objection among the participants. The complainants also note that the conservation plan was written by individuals without any objectively demonstrable indicators for competence in hazel grouse biology, such as a publication record on hazel grouse, while experienced Hazel grouse experts are available in France and elsewhere, but have not been involved in writing the conservation plan. Finally, a distribution map of hazel grouse in the Vosges extracted from this conservation plan was shown. The map suggests a few scattered remnant survivors in the Vosges, albeit in imminent danger of extinction. As several times before, the complainants expressed reservations on these observations due to the well-established experience elsewhere that footprints and chance observations very often involve confusions with other bird species, especially by inexperienced observers.

Marc Montadert from the Office Français de la biodiversité and scientific correspondent of the Office des Galliformes de Montagne, and an internationally respected hazel grouse expert with long-term projects in France, also emphasized the risk of confusion in a message of his which was read during the videoconference. Furthermore, this leading expert criticized the conservation action plan as coming too late for the critically endangered relict stock, and he pointed out that inexperienced people can hardly spot a few scattered hazel grouse. Questions regarding the methodology of the population survey for the action plan and insights into the record types and documentation, posed by the complainants in advance of the videoconference by email, could not be answered by those who presented the map.

Both complaining NGOs emphasized their concordant position concerning the subsequent course of action in this late stage in the extinction process of *T. b. rhenana*, to request a) an objective review of all observations of alleged survivors compiled in the conservation plan and b) an immediate dedicated search for Hazel grouse at potentially remaining localities of survival in the Vosges starting without delay within the first quarter of 2025. Both activities must involve experienced species experts. In the event of hazel grouse discoveries, an expert committee with demonstrable expertise in questions of the management and rescue of small relict animal populations is to be convened without delay, to deliberate with the French authorities whether scattered individuals without any chance of survival or reproduction in situ should be taken into human captive rescue with aim of a last-ditch effort for ex situ conservation, or not. This decision should rest solely on scientific criteria.

The above position had also been forwarded to the DREAL in advance of the videoconference, and a revised version was distributed to DREAL and all participants of the videoconference on 23rd December 2024. The latter was meant as the complainants' contribution to a joint response by both DREAL and the complainants towards the COE. As agreed with DREAL during the online meeting, we received a written position by DREAL also on 23rd December, preformulated as a letter for the COE to be signed by complainants too.

However, the proposal was unacceptable since DREAL had not even summarized the outcome of the videoconference correctly. DREAL "admitted" that the *rhenana* subspecies "exists". Here, we note that it is not the task or expertise of a provincial administration to "decide" on or to question an already existing uncontroversial scientific consensus of all hazel grouse taxonomists. However, in their

draft letter for us of December 2024 DREAL objected that while “*rhenana* exists” their own “genetic” study could not confirm that the very last birds in Vosges were actually *rhenana*, leaving this open for future research. We note this as a crude case of misinformation, since the employed geneticist himself had stated unmistakably in the videoconference that his data had no informative value for systematics on account of statistical shortcomings he had overlooked in his first report for the DREAL, and thus the study could in no case be used to confirm or doubt the taxonomic identity of single individuals. We note that Dr. Jacob could not prove the identity of the Vosgian birds since he explicitly failed to present valid data as such. Anybody seeing the taxonomic doubts of DREAL officers may easily check that the concept of *T. b. rhenana* in the Vosges is international scientific consensus, and also the specially recruited committee for bird taxonomy within Central Europe of the German Ornithological Society – roof organization of bird scientists in Germany has reconfirmed again, in their latest list from 2018 of standardized taxonomic names prescribed for birds in our region, that the *T. b. rhenana*-concept is valid.

Furthermore, DREAL’s draft for a joint response to COE stated a population of “less than 100 grouse” surviving. This is unacceptable. Perhaps none survive at all, and the very optimistic belief of the action plan that up to 50 may perhaps survive could not be supported by any information of how this estimate had been reached methodically. Not even now did we learn how the authors of this plan came to their estimate. That DREAL within few days after the meeting doubled the population estimate from an already very optimistic “up to 50” to “less than 100” is an unacceptably lax way of handling facts.

The most disturbing statement in this letter draft was that with “only less than 100” surviving the population would be doomed anyway and cannot be preserved in the Vosges.

We note that hazel grouse is protected under Natura 2000 and the Berne Convention, the latter referring also to subspecies and varieties. Authorities in charge of conservation stating that a population of only 100 birds does not deserve intense conservation action since it is doomed anyway is nothing more than a slap in the face of good, well-established and proven-to-work international conservation practice, and in our eyes is a breach of European legal standards.


DREAL ignored our further reaction to merge our two positions for a joint response to the COE. Instead, in early January 2025 DREAL sent us good wishes for the New Year and announced to reply to our position in two days. This did not happen.

Thus, we continue to insist that able experts need be involved in a last survey in the Vosges to complement the local laypeople appointed by DREAL in order to ascertain if hazel grouse of *T. b. rhenana* survive at all, and how many. Afterwards, experts with a proven track record of conserving rare taxa should meet immediately to decide if the complainants’ original plan to secure the last birds via captive management, under European guidance, is still feasible and promising.

Any further delay of proactive conservation work will result in the taxon’s extinction which we cannot accept, moreover as it is in our opinion a breach of European legal standards.

For the above:

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