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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

41<sup>st</sup> meeting  
Strasbourg, 30 November – 3 December 2021

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**New complaint: 2020/8**

**Alleged threat to biodiversity due to draft  
amendment of hunting legislation (Bulgaria)**

**- COMPLAINANT REPORT -**

*Document prepared by  
Bulgarian Society for the Protection of Birds*

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Българско дружество  
за защита на птиците

Ref. 77/23.8.2021

**To:** Bern Convention Secretariat  
Directorate of Democratic Participation  
Council of Europe  
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### FOLLOW-UP REPORT

#### Re Complaint 2020/8 „Alleged threat to biodiversity due to proposed draft amendment of hunting legislation“ by the Bulgarian Society for the Protection of Birds (BSPB) / BirdLife Bulgaria

Dear Colleagues,

After the Complaint 2020/8 has been submitted, the BSPB was invited to a constructive dialogue with the Executive Forest Agency (EFA) at the Ministry of Agriculture, Food and Forestry (MAFF). Moreover, the BSPB was formally included in the Working Group set by Order-877/29.10.2020 of the Executive Director of EFA to discuss the received statements from other institutions and NGOs during the public consultation regarding the amendments proposed by the MAFF to the National Hunting and Game protection Act. The meeting of the Working Group was held online on 24.11.2020. When it came to the subject aiming to legalize the use of all illegal and non-selective methods and means of hunting in the nature, there was a discussion whether to withdraw all the points violating the Bern Convention (Art.1, Art. 2, Art. 3.1, Art. 6a, Art. 7.1, Art. 8, Art. 10.1, and Appendices II, III and IV) or alternatively leave just the option for hunting using night vision devices to control the wild boar population in order to limit the dissemination of the African swine fever. There was no consensus of Working Group members on the latter: five members voted positively, four members voted negatively and one was neutral. Based on this result, the EFA decided to address this issue to the Bulgarian Ministry of Environment and Water (MoEW) so that they can take the final decision regarding the suggested text. The same was addressed in the report (ИАГ-28314/09.12.2020) from the Executive Director of EFA to the Minister of Agriculture, Food and Forestry. Considering the support of the MoEW during constructive discussions with EFA on this matter, as well as per MoEW letter to Bern Convention Secretariat from 29.01.2021, the BSPB has no doubt that the right decision has been taken. As we know, the suggested amendments were entirely withdrawn. **Therefore, the BSPB as the Complainant confirms that this case can be closed by the Bern Convention Secretariat.**

On behalf of BSPB:  
(Focal point re this case)  
Stoyan Nikolov