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Ms Iva Obretenova  
Secretary of the Bern Convention,  
Council of Europe  
Avenue de l'Europe  
F-67075 Strasbourg Cedex, France

**Date:** 24/09/2018

Dear Iva,

## Shaping up the post-2020 strategic priorities of the Bern Convention on IKB

Thank you for providing me with the report and questionnaire on post-2020 policy priorities on eradication of illegal killing, taking and trade in wild birds. In the UK, policy makers, delivery bodies and law enforcement cooperate closely to combat the illegal killing of birds (IKB) and other crimes against wild animals.

There are some issues raised in both the report and the questionnaire which we feel would be better addressed with a high level response. The UK's concerns with these documents are as follows:

1. Objectives to ensure comprehensive legal provisions in Contracting Parties' national legislation cannot extend beyond agreed legal obligations set under Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (the Birds Directive) and other international agreements. For example, the establishment of bag limits is not required under the Birds Directive and should not be proposed as an objective for this exercise.
2. Objectives to improve and expand data collection should not extend beyond IKB. The objectives include the provision of indicators on the number of legal killing of birds and a requirement to report on legal exemptions. This information is not relevant to IKB.
3. Objectives that make reference to policing, the judiciary, penalties and criminal proceedings are not appropriate for this document. These are issues that are within national competence and, therefore, should be outside of the scope of this exercise.

I understand that Contracting Parties' answers to the questionnaire will inform the drafting of post-2020 policy priorities for the Bern Convention, and an updated document will be considered at the

meeting of the Standing Committee in November. I look forward to helping to shape this document before its final publication at the CMS MIKT Task Force in 2019.

Yours sincerely

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