

Strasbourg, 12 July 2018  
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**T-PVS/Inf(2018)2**

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

38<sup>th</sup> meeting  
Strasbourg, 27-30 November 2018

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**Post-2020 policy priorities on eradication of  
illegal killing, taking and trade in wild birds**

**QUESTIONNAIRE FOR BERN CONVENTION  
CONTRACTING PARTIES AND PARTNERS**

*Document prepared by  
Mr Sergei Golovkin, Malta*

## **Post-2020 policy priorities on eradication of illegal killing, taking and trade in wild birds**

### **Questionnaire for Bern Convention Contracting Parties and Partners**

#### **Introduction**

This questionnaire should be read in conjunction with the Concept Note – *“Beyond 2020: Bringing an end to illegal killing, taking and trade in wild birds as a conservation concern for the flyways”*.

The aim of this questionnaire is to solicit the views of the Bern Convention Contracting Parties, Observers, partner organisations, NGOs and other stakeholders on the potential post-2020 Bern Convention policy priorities related to the fight against illegal killing, taking and trade of wild birds (IKB). The feedback obtained through this questionnaire will serve as a further input to update the Concept Note, with the view to presenting a finalised document for a final round of consultation, and eventual consideration by the Standing Committee in November 2018.

The questionnaire consists of six sections. Section 2 provides an opportunity to identify any strengths, weaknesses, opportunities or threats that may have been omitted from the situation analysis chapter of the Concept Note. Respondents also have the possibility of ranking these factors in terms of their relative importance. Section 3 solicits views on the proposed time horizon for post-2020 IKB policy. Section 4 focuses on defining the overall vision for post-2020 policy. Section 5 provides opportunity for detailed review of strategic objectives and targets proposed in the Concept Note and possibility for introducing alternative proposals. Section 6 provides respondents with the necessary space to express any other comment, propose additional objectives or targets, as well as possibility to identify any significant issues or factors that may have been missed or omitted, as well as any issues or factors that should perhaps not be included in the Concept Note.

Although the precise wording or definitions is certainly important, at this particular stage, wordsmithing is not within the scope of the present exercise. Therefore minor editorial suggestions or amendments to particular wording should not be considered at this stage.

Please return completed questionnaire together with any suggested amendments or comments on the Concept Note (in track changes mode) via email to: [iva.obretenova@coi.int](mailto:iva.obretenova@coi.int), copying in [sergei.a.golovkin@gmail.com](mailto:sergei.a.golovkin@gmail.com) by 15<sup>th</sup> of September 2018.

## 1. RESPONDENT ORGANISATION

Name and surname of the respondent person	András Schmidt
Respondent organisation	Ministry of Agriculture
Respondent's position within the organisation	Deputy Head of Department for Nature Conservation
Email	andras.schmidt@am.gov.hu
Telephone	+36-30-6788764
Address	1055 Budapest, Kossuth tér 11.
Representing (tick as applicable – more than one entry can be selected):	
Bern Convention Contracting Party	+
Bern Convention Observer State	
Member of Bern Convention Network of Special Focal Points on Eradication of Illegal Killing of Birds	+
Member of the CMS Inter-governmental Task Force on Eradication of Illegal Killing of Birds in the Mediterranean	
NGO	
International inter-governmental organisation, network, body or agency	
Private expert (not representing an organisation)	

## 2. STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS (SWOT)

Please identify **five** strengths, weaknesses, opportunities and threats related to the fight against IKB, from the perspective of the Bern Convention.

It must be stressed that these SWOT factors should not reflect the specific viewpoint of your organisation, but should focus on the international policy perspective represented by the Bern Convention.

So for example if your organisation is a national NGO that identifies “lack of funding” as a weakness and a threat (in terms of your organisation’s operations), this should not qualify as a response.

However, if your organisation sees that particular SWOT factors should be considered at the level of Bern Convention’s overall policy on IKB, then these factors should be listed – for example – lack of institutional support for national NGOs working to help enforcement on IKB in a given country or area could be listed as a weakness factor to be considered in the overall Bern Convention’s post-2020 policy.

Please also note that “strengths” and “weaknesses” are inherently internal factors, i.e. factors that arise out of the structure or implementation of Bern Convention’s policy on IKB; whereas “opportunities” and “threats” represent inherently external factors, that may be outside of the immediate control of the Bern Convention or its Contracting Parties, but are nonetheless very important to be considered in the formulation of policy priorities, in a manner that would ultimately seek to capitalise on opportunities, whilst seeking to mitigate or eliminate threats.

If you feel that any particular SWOT factors are more important than others, then please indicate if the factors are ranked in the order of priority, in the space provided.

<p><b>Strengths</b></p> <ol style="list-style-type: none"> <li>1 Running LIFE projects to reduce IKB</li> <li>2 Strong legislative basis in most countries, including 28 EU member states where legislation is harmonised by the Birds Directive</li> <li>3 Basic assessments of the scale of IKB within key regions are already available</li> <li>4 Stakeholders in IKB are organised and highly networked, particularly through umbrella groups such as MIKT and Bern SFPs Network</li> <li>5 A wide variety of high quality expertise on various specialised aspects of addressing IKB is available</li> </ol>	<p><b>Opportunities</b></p> <ol style="list-style-type: none"> <li>1 IKB is generally a high-visibility issue, and is increasingly becoming so in many of the problem areas – this presents opportunities for mobilizing necessary political will and resources to combat IKB</li> <li>2 Increase focus on lasting change of attitude towards migratory birds and nature in general. This includes growing sensitivity of society towards animal torture (emotions!)</li> <li>3 A joined-up ethos of co-working and involvement of diverse stakeholder groups in addressing IKB at international level championed through MIKT and Bern SFPs Network can be further promoted particularly at local and national level</li> <li>4 Multiple existing good practices (e.g. linking IKB NAP with Scoreboard in Italy, legal changes in Cyprus, France and Malta, stakeholder engagement in Lebanon, etc) present opportunity for dissemination and replication</li> <li>5 Potential to increase focus on emotion without abandoning science in narratives that combine emotion, science and follow-up action</li> </ol>
<p><b>Weaknesses</b></p> <ol style="list-style-type: none"> <li>1 Lack of understanding of the significance of IKB by many of the judiciary and of prosecutors</li> <li>2 Funding and resources for IKB-related work are difficult to access and may not be available to some actors. Coordination amongst donors is challenging</li> <li>3 Lack of capacity among rangers, and especially police</li> <li>4 IKB expertise may be lacking at local and national levels among the police, for example</li> <li>5 Poor resourcing and funding for IKB prevention and control reflects lack of real political or social and economic priority afforded to IKB issues</li> </ol>	<p><b>Threats</b></p> <ol style="list-style-type: none"> <li>1 A highly variable willingness and capacity to enforce against IKB undermines progress in some areas</li> <li>2 Apathy of national administrations - a significant number of Contracting Parties exhibit low levels of involvement in IKB issues; policy agenda on many aspects is mainly driven by NGOs, resulting in lack of state ownership and leadership over the issue</li> <li>3 Lack of expertise, technical capacity and resources at local authorities' level</li> <li>4 Local politicians pondering to interests of local communities engaged in IKB; cronyism and corruption in general; inefficiency of institutions; weak rule of law ; thriving organised crime - these issues are rarely discussed in open fora despite seriously hampering attainment of policy objectives</li> <li>5 Despite political appeal and uptake of « zero-tolerance » rhetoric, IKB is still widely tolerated in many regions</li> </ol>

Are SWOT factors listed above ranked in terms of their relative priority? **Y / N**

### 3. TIME HORIZON OF THE POST-2020 IKB POLICY PRIORITIES OF THE BERN CONVENTION

Please indicate your agreement or disagreement with the following statements:

Statement	Agree	Disagree
IKB phenomenon is very dynamic, and therefore policy priorities to fight IKB should <b>not be fixed for any term longer than a year</b>		X
IKB policy priorities should be defined for a period of <b>three</b> years		X
IKB policy priorities should be defined for a period of <b>five</b> years	X	
IKB policy priorities should be defined for a period of <b>ten</b> years		X
IKB policy priorities should be defined for a period of <b>longer than 10</b> years		X

#### 4. THE VISION FOR THE POST-2020 POLICY

The vision proposed in the Concept Note document is reproduced below:

*In the ten-year period between 2020 and 2030, Bern Convention, its Contracting Parties and other partners and stakeholders will continue to build upon the measures piloted under Tunis Action Plan and MIKT PoW, taking bolder action and scaling up efforts as necessary, to ensure that by 2030, IKB shall no longer exist as a significant conservation concern within the flyway shared by Bern Convention's Contracting Parties. By 2030, Contracting Parties will strive to achieve a 90% reduction in the scale and extent of IKB within their national territories, over a 2020 baseline. In doing so, Bern Convention will continue to strengthen partnerships with CMS and other multilateral environmental agreements, institutions, networks and stakeholders, to promote eradication of IKB in all of our planet's flyways.*



## 5. STRATEGIC OBJECTIVES AND HIGH-LEVEL TARGETS

This section of the questionnaire provides an opportunity to comment on the proposed draft strategic objectives and high-level targets listed in the Concept Note. The rationale for these proposed objectives and targets, as well as their relationship to the overall vision are described in detail in Chapter 5 of the Concept Note. The objectives and targets are reproduced in the table below. Please indicate your agreement or otherwise with the proposed text in the third column of the table. In case you disagree with the proposed text or wish to propose alternatives, please use the fourth or fifth columns for alternative text.

<b>Objective 1 - Understanding drivers behind and extent of IKB and its conservation consequences at flyway level</b>		<b>I agree with the proposed objective, its link to the vision and the proposed targets.</b>	<b>I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. Please indicate suggested amendments in this column.</b>	<b>I disagree with including this objective and targets, which, in my view, need to be redefined completely. Please state rationale for disagreement and offer alternative proposals in this column.</b>
<b>Description and link to vision</b>	Effectively addressing IKB and its conservation consequences would only be possible on the basis of thorough understanding of the reasons behind IKB, extent of IKB problem, and the scale of ecological damage caused by IKB. It is essential that IKB assessments are performed periodically in all states that are contracting Parties of the Bern Convention, in a manner that would allow analysis of the likely ecological consequences caused by IKB in any particular country or region for the entire flyway.	+		
<b>High-level targets</b>	1.1 Common methodology for carrying out IKB assessments is developed and adopted by Bern Convention Standing Committee by 2021. Methodology should allow for systematic assessment of, <i>inter alia</i> :	+		

Objective 1 - Understanding drivers behind and extent of IKB and its conservation consequences at flyway level	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. Please indicate suggested amendments in this column.	I disagree with including this objective and targets, which, in my view, need to be redefined completely. Please state rationale for disagreement and offer alternative proposals in this column.
<p>a. Drivers and motivation behind various IKB categories;</p> <p>b. Scale of IKB, including mortality, trends, seasonal and geographic distribution;</p> <p>c. Typology, number and trends in prosecution of IKB cases;</p> <p>d. Impact of mortality due to IKB upon flyway populations.</p> <p>The above methodology may be based on the methodology pioneered by BLI in its initial assessments (e.g. “the Killing” study); it must ensure participative approach and full involvement of national administrations apart from other stakeholders including representatives of the hunting community.</p> <p>1.2 Status and scale of IKB is systematically assessed in each Bern Convention Contracting Party at state level using a common methodology. Assessments are repeated periodically in sync with IKB Scoreboard, i.e. in 2023, 2026, 2029.</p> <p>1.3 Beyond the area covered by Bern Convention Contracting Parties, the Convention shall work closely with stakeholders in other</p>			



Objective 1 - Understanding drivers behind and extent of IKB and its conservation consequences at flyway level	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. Please indicate suggested amendments in this column.	I disagree with including this objective and targets, which, in my view, need to be redefined completely. Please state rationale for disagreement and offer alternative proposals in this column.
<p>regions to perform IKB assessments in Central Asia and Sub-Saharan Africa by 2023.</p> <p>1.4 Bern Convention Contracting Parties shall aim to achieve a reduction in the assessed scale of IKB within their national territory in comparison with a 2020 baselined as follows: 2023 – 25% reduction; 2026 – 50% reduction; 2029 – 90% reduction.</p> <p>1.5 By 2023, the Secretariat of the Convention shall, together with relevant stakeholders, agencies and networks, develop and enact a programme of support to aid Contracting Parties and other partners in the achievement of the above objectives.</p>			

<b>Objective 2 - Ensuring robust and comprehensive national legal systems to respond to IKB</b>		<b>I agree with the proposed objective, its link to the vision and the proposed targets.</b>	<b>I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)</b>	<b>I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)</b>
<b>Description and link to vision</b>	<p>Robust national legislation and rigorous regulatory controls are essential prerequisites for eradication of IKB. It is expected that countries should strive to assess and improve their legal and regulatory framework, to ensure that it:</p> <ul style="list-style-type: none"> <li>a. Correctly transposes applicable international commitments related to IKB under appropriate MEAs to which the state is a party;</li> <li>b. Contains clear and adequate provisions to prohibit and combat IKB;</li> <li>c. Provides for necessary regulations and controls over activities that impact bird populations;</li> <li>d. Clearly defines prohibitions related to IKB, and where exemptions from these prohibitions are possible, provides for adequate regulatory controls for authorising and supervising such exemptions;</li> <li>e. Provides adequate and sufficient deterrents and penalties for IKB;</li> </ul>			
<b>High-level</b>	2.1 By 2023, Contracting Parties		.1 By 2023, Contracting Parties shall	

Objective 2 - Ensuring robust and comprehensive national legal systems to respond to IKB		I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
targets	<p>shall ensure that their national legislation:</p> <ul style="list-style-type: none"> <li>a. Has adequate provisions to deter and combat IKB;</li> <li>b. Is supported by necessary binding legal instruments, regulations, and institutional frameworks for implementation and enforcement;</li> <li>c. Integrates regulation of hunting and ensures the taking into account of biological and conservation aspects in hunting-related decisions;</li> <li>d. Lays down comprehensive provisions concerning: <ul style="list-style-type: none"> <li>i. Establishment and definition of hunting seasons</li> <li>ii. Listing species that can be hunted</li> <li>iii. Definition of hunting areas Regulation and definition of which methods are allowed for hunting</li> <li>iv. Provision for appropriate authorization mechanism and criteria for obtaining a hunting license, including requirements for compulsory examination of hunting license applicants</li> </ul> </li> </ul>		<p>ensure that their national legislation:</p> <ul style="list-style-type: none"> <li>r. Has adequate provisions to deter and combat IKB;</li> <li>s. Is supported by necessary binding legal instruments, regulations, and institutional frameworks for implementation and enforcement;</li> <li>t. Integrates regulation of hunting and ensures the taking into account of biological and conservation aspects in hunting-related decisions;</li> <li>u. Lays down comprehensive provisions concerning: <ul style="list-style-type: none"> <li>viii. Establishment and definition of hunting seasons</li> <li>ix. Listing species that can be hunted</li> <li>x. Definition of hunting areas Regulation and definition of which methods are allowed for hunting</li> <li>xi. Provision for appropriate authorization mechanism and criteria for obtaining a hunting license, including requirements for compulsory examination of hunting license applicants</li> <li>xii. Establishment of bag limits and quotas for huntable species on the basis of biological and conservation considerations</li> <li>xiii. Provision for the timely collection of hunting bag data and reporting</li> </ul> </li> </ul>	

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	<ul style="list-style-type: none"> <li>v. Establishment of bag limits and quotas for huntable species on the basis of biological and conservation considerations</li> <li>vi. Provision for the timely collection of hunting bag data and reporting mechanisms</li> <li>vii. Controls related to implementation, including enforcement (for instance providing enforcement powers to game wardens, park range</li> <li>e. Generally prohibits:               <ul style="list-style-type: none"> <li>i. Deliberate killing of wild birds</li> <li>ii. Taking of wild birds The use of means such as nets, traps, lime sticks, sound-devices, etc. for capturing birds</li> <li>iii. Possession of live or dead wild birds or their parts</li> <li>iv. Importation or transport of wild birds or their derivatives</li> </ul> </li> <li>f. Where authorization of specific exceptions from the above prohibitions is possible, defines comprehensive criteria upon which such exemptions can be</li> </ul>		<ul style="list-style-type: none"> <li>mechanisms</li> <li>xiv. Controls related to implementation, including enforcement (for instance providing enforcement powers to game wardens, park range</li> <li>v. Generally prohibits:               <ul style="list-style-type: none"> <li>v. Deliberate killing of wild birds</li> <li>vi. Taking of wild birds The use of means such as nets, traps, lime sticks, sound-devices, etc. for capturing birds</li> <li>vii. Possession of live or dead wild birds or their parts</li> <li>viii. Importation or transport of wild birds or their derivatives</li> </ul> </li> <li>w. Where authorization of specific exceptions from the above prohibitions is possible, defines comprehensive criteria upon which such exemptions can be granted by the responsible authority, which criteria must correspond to criteria for exemptions stipulated in Bern Convention / CMS / EU Birds Directive (for EU MS only);</li> <li>x. Establishes, for each exemption granted on an annual basis, a specific regulatory mechanism that ensures strict supervision of compliance, monitoring and reporting;</li> <li>y. Requires that data on all exemptions granted, is compiled on an annual basis</li> </ul>	

Objective 2 - Ensuring robust and comprehensive national legal systems to respond to IKB	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
<p>granted by the responsible authority, which criteria must correspond to criteria for exemptions stipulated in Bern Convention / CMS / EU Birds Directive (for EU MS only);</p> <p>g. Establishes, for each exemption granted on an annual basis, a specific regulatory mechanism that ensures strict supervision of compliance, monitoring and reporting;</p> <p>h. Requires that data on all exemptions granted, is compiled on an annual basis and is publicly available including information on affected species, number of specimens, justification, the responsible authorities, permitting and licensing procedures, compliance monitoring;</p> <p>i. Provides a comprehensive description(s) of specific IKB-related offences that encompass illegal killing, trapping, trade, possession, transport, importation and taxidermy of wild birds;</p> <p>j. Stipulates both the minimum and a maximum penalty for all</p>		<p>and is publicly available including information on affected species, number of specimens, justification, the responsible authorities, permitting and licensing procedures, compliance monitoring;</p> <p>z. Provides a comprehensive description(s) of specific IKB-related offences that encompass illegal killing, trapping, trade, possession, transport, importation and taxidermy of wild birds;</p> <p><del>aa. Stipulates both the minimum and a maximum penalty for all offence categories except those where a level of penalty is fixed permanently in the law;</del></p> <p>bb. Provides for a full spectrum of criminal and administrative sanctions including: fines, imprisonment (both effective and suspended jail terms are usually automatic for the most severe cases of IKB), suspension of license, confiscation of <i>corpus delicti</i>, permanent revocation of license in the case of IKB involving highly protected birds;</p> <p>cc. Ensures that:</p> <p>v. Penalties for IKB are prescribed in legislation and provide for criminal prosecution;</p>	

Objective 2 - Ensuring robust and comprehensive national legal systems to respond to IKB	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
<p>offence categories except those where a level of penalty is fixed permanently in the law;</p> <p>k. Provides for a full spectrum of criminal and administrative sanctions including: fines, imprisonment (both effective and suspended jail terms are usually automatic for the most severe cases of IKB), suspension of license, confiscation of <i>corpus delicti</i>, permanent revocation of license in the case of IKB involving highly protected birds;</p> <p>l. Ensures that:</p> <p>i. Penalties for IKB are prescribed in legislation and provide for criminal prosecution;</p> <p>ii. Fully reflect severity of offences on the basis of gravity factors recommended as part of Bern Convention Tunis Action Plan;</p> <p>iii. Are generally seen as providing an adequate and proportionate deterrent for all IKB cases, as evidenced through sustained IKB crime decline (sustained decline in</p>		<p>vi. Fully reflect severity of offences on the basis of gravity factors recommended as part of Bern Convention Tunis Action Plan;</p> <p>vii. Are generally seen as providing an adequate and proportionate deterrent for all IKB cases, as evidenced through sustained IKB crime decline (sustained decline in IKB cases observed over at least 3 years);</p> <p>viii. Treat wildlife crime offences involving organized criminal groups as serious crime.</p> <p>dd. Ensures applicability of criminal law in most IKB cases;</p> <p>ee. Clearly describes offence categories that are subject to criminal as opposed to administrative liability;</p> <p>ff. Is supported by mechanisms that harmonize wildlife and other key domestic legislation such as police laws, weapons laws, other criminal laws;</p> <p>gg. Contains provisions related to organised crime;</p> <p>Fully and correctly transposes Bern Convention and CMS commitments related to IKB.</p> <p><i>Establishing a minimum and a maximum</i></p>	

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	<p>IKB cases observed over at least 3 years);</p> <p>iv. Treat wildlife crime offences involving organized criminal groups as serious crime.</p> <p>m. Ensures applicability of criminal law in most IKB cases;</p> <p>n. Clearly describes offence categories that are subject to criminal as opposed to administrative liability;</p> <p>o. Is supported by mechanisms that harmonize wildlife and other key domestic legislation such as police laws, weapons laws, other criminal laws;</p> <p>p. Contains provisions related to organised crime;</p> <p>q. Fully and correctly transposes Bern Convention and CMS commitments related to IKB.</p>		<p><i>penalty does not seem realistic at present with regard to the setup of Hungarian legislation (minimum and maximum penalties are not part of the legislation of any sector). But it may be a useful tool in some countries, so I would add "where feasible".</i></p>	
	2.2 By 2023, Contracting Parties shall undertake all measures necessary to ensure that there are no pending / unresolved case files / complaints under Bern Convention related to incorrect transposition of the provisions of the Convention into national law, or their	+		

<b>Objective 2 - Ensuring robust and comprehensive national legal systems to respond to IKB</b>		<b>I agree with the proposed objective, its link to the vision and the proposed targets.</b>	<b>I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)</b>	<b>I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)</b>
	implementation.			
	2.3 By 2023, the Secretariat of the Convention shall, together with relevant stakeholders, agencies and networks, shall develop and enact a programme of support for Contracting Parties aiming to facilitate achievement of the above objectives.	+		



Objective 3 - Ensuring that the law is implemented and enforced		I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
<b>Description and link to vision</b>	Even the best law needs to be properly enforced and implemented. In order to achieve the vision of putting an end to IKB as a flyway conservation concern, Bern Convention Contracting Parties must work in concert with the necessary stakeholders and partners to ensure that they have necessary enforcement and implementation mechanisms in place, backed by clear national enforcement priorities and action plans, underpinned by adequate enforcement capacities, including human, material and financial resources.	+		
<b>High-level targets</b>	<p>3.1 By not later than 2023, all Contracting Parties should have developed, adopted, published, commenced implementation, regular monitoring and review of their National Action Plans to address IKB at the national level in a concerted manner with the involvement of the necessary stakeholders.</p> <p>3.2 By not later than 2021, Contracting Parties should ensure</p>		<p>3.5 By 2023, the Contracting Parties shall ensure that at least 50% of enforcement personnel deployed within the law enforcement agencies <u>who are regularly</u> tasked with IKB-related enforcement, would have undergone appropriate specialised training on IKB-related issues. Contracting Parties shall strive to maintain and further improve this training ration thereafter, so as to reach a target of 80% of officers so trained by 2029.</p> <p><i>Potentially all policemen have to deal</i></p>	

Objective 3 - Ensuring that the law is implemented and enforced	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
<p>that IKB is afforded the highest level of enforcement priority on a national level, <i>on par</i> with other forms of serious wildlife crime.</p> <p>3.3 Since concerted action drawing on the support and resources of a broad range of stakeholders is, in the long term, more effective in producing results, than a unilateral action, Contracting Parties should strive to enact appropriate mechanisms at the national level, that would ensure stakeholders' participation in policy decisions concerning IKB. Such mechanisms may take the form of, <i>inter alia</i>, formal stakeholder structures and committees at national level, or legal provisions requiring the authorities to ensure stakeholder consultation and involvement in decision-making processes.</p> <p>3.4 By 2023, Contracting Parties shall ensure that the designated law enforcement agencies tasked with IKB-related enforcement duties should have adequate staff complement, adequate and appropriate for prevailing IKB</p>		<p><i>occasionally with IKB, but training 50% of them would be very unrealistic (information materials are possible, however).</i></p>	

Objective 3 - Ensuring that the law is implemented and enforced	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
<p>trends in the country. States shall furthermore ensure that such enforcement entities have appropriate recruitment and training processes in place that result in the selection, retention, continuous development and training of appropriately qualified personnel possessing the right mix of skills, knowledge and expertise to effectively tackle IKB challenge in the country.</p> <p>3.5 By 2023, the Contracting Parties shall ensure that at least 50% of enforcement personnel deployed within the law enforcement agencies tasked with IKB-related enforcement, would have undergone appropriate specialised training on IKB-related issues. Contracting Parties shall strive to maintain and further improve this training ration thereafter, so as to reach a target of 80% of officers so trained by 2029.</p> <p>3.6 By 2023, the Secretariat of the Convention shall, together with other stakeholders such as Interpol, Europol, IMPEL and</p>			

Objective 3 - Ensuring that the law is implemented and enforced	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
other relevant enforcement agencies and networks, develop and enact a programme of support for Contracting Parties in facilitating exchange of enforcement expertise, training for enforcement personnel, capacity-building, and similar activities, in the areas of relevance to overall capacity building for enforcement against IKB.			

<b>Objective 4 - Ensuring efficient justice for IKB-related offences</b>		<b>I agree with the proposed objective, its link to the vision and the proposed targets.</b>	<b>I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)</b>	<b>I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)</b>
<b>Description and link to vision</b>	The mere existence of elaborate legislation, even when backed by sufficient enforcement in the field, would not, in itself, guarantee success against IKB, unless complemented by an effective and efficient justice system and credible deterrents against IKB-related crime. Consequently, in order to bring an end to IKB as a conservation concern for the flyway, Contracting Parties and other partners must further develop their capacities to improve prosecution procedures, sentencing processes, ensure adequacy and proportionality of penalties and sanctions against IKB that reflect appropriate gravity factors, including conservation impact of IKB.	+		
<b>High-level targets</b>	<p>4.1 By 2023, Contracting Parties shall implement requisite measures to improve the quality, effectiveness and efficiency of prosecution and justice to ensure that:</p> <p>a. Over 90% of all criminal proceedings (excluding appeals) in IKB cases are</p>		<p>4.1 By 2023, Contracting Parties shall implement requisite measures to improve the quality, effectiveness and efficiency of prosecution and justice to ensure that:</p> <p>g. Over 90% of all criminal proceedings (excluding appeals) in IKB cases are concluded within one year from initiation;</p> <p>h. Over 90% of all administrative</p>	

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<p>concluded within one year from initiation;</p> <p>b. Over 90% of all administrative proceedings (excluding appeals) in IKB cases are concluded within 3 months from initiation;</p> <p>c. Over 90% of all criminal or administrative proceedings in IKB cases result in conviction;</p> <p>d. Over 90% of all criminal or administrative proceedings in IKB cases are handled by specialised prosecutors and judges;</p> <p>e. Information on prosecution and sentences / sanctions applied in the case of IKB-related criminal or administrative proceedings is recorded and made publicly accessible;</p> <p>f. Sentencing guidelines for IKB cases are finalised and adopted;</p> <p>4.2 By 2025, Contracting Parties shall ensure that more than 50% of all environmental prosecutors and judges who deal with wildlife crime have received training in IKB-related aspects. As a result,</p>		<p>proceedings (excluding appeals) in IKB cases are concluded within 3 months from initiation;</p> <p><del>i. Over 90% of all criminal or administrative proceedings in IKB cases result in conviction;</del> (conviction depends on evidence, among others, it does not seem feasible for such a high percentage)</p> <p><b><u>j. Over 50% of all criminal or administrative proceedings in IKB cases, where conviction is achieved, the penalties imposed are exemplary and dissuasive</u></b></p> <p><del>k. Over 90% of all criminal or administrative proceedings in IKB cases are handled by specialised prosecutors and judges; (this is not feasible in countries where prosecutors and judges are not specialised)</del></p> <p>l.</p> <p>m. Information on prosecution and sentences / sanctions applied in the case of IKB-related criminal or administrative proceedings is recorded and made publicly accessible;</p> <p>n. Sentencing guidelines for IKB cases are finalised and adopted;</p> <p>4.2 By 2025, Contracting Parties shall ensure that more than 50% of all environmental prosecutors and judges who</p>	

Objective 4 - Ensuring efficient justice for IKB-related offences	I agree with the proposed objective, its link to the vision and the proposed targets.	I broadly agree with the proposed objective, its link to the vision and the proposed targets, but have some revisions to improve the text. (Please indicate suggested amendments in this column.)	I disagree with including this objective and targets, which, in my view, need to be redefined completely. (Please state rationale for disagreement and offer alternative proposals in this column.)
<p>prosecutors and judges should become well aware of the nature and prevalence of wildlife crime, and the impact and potential profits of wildlife crime; have a high level of awareness of wildlife crime-related charges; should collaborate to deliver verdicts that are appropriate to the nature and severity of the crime and should routinely adhere to sentencing guidelines.</p> <p>4.3 By 2023, the Secretariat of the Convention shall, together with other stakeholders such as Interpol, Europol, IMPEL and other relevant enforcement agencies and networks, develop and enact a programme of support for Contracting Parties in facilitating exchange of expertise amongst prosecutors and judges, training, capacity-building, and similar activities, in the areas of relevance to overall capacity building for justice against IKB.</p>		<p>deal with wildlife crime have received training in IKB-related aspects. As a result, prosecutors and judges should become well aware of the nature and prevalence of wildlife crime, and the impact and potential profits of wildlife crime; have a high level of awareness of wildlife crime-related charges; should collaborate to deliver verdicts that are appropriate to the nature and severity of the crime and should routinely adhere to sentencing guidelines.</p> <p>4.3 By 2023, the Secretariat of the Convention shall, together with other stakeholders such as Interpol, Europol, IMPEL and other relevant enforcement agencies and networks, develop and enact a programme of support for Contracting Parties in facilitating exchange of expertise amongst prosecutors and judges, training, capacity-building, and similar activities, in the areas of relevance to overall capacity building for justice against IKB.</p>	