

DFB – BGF – Comments on :

A proposed new EU directive on invasive alien species

The Deutsche Falknerbund (DFB) e.V. is a non-profit association for the conservation of nature and at the same time home to numerous German falconers, bird of prey and owl keepers as well as supervisors and attendants of raptor sanctuary stations.

The Bundesverband Gewerbliche Falknerei (BGF) e.V. is a federation of German commercial falconers, bird of prey breeders, raptor zoos and specialists for harassment and deterrence of problem animals. The federation has emerged from the Greifvogelzuchtverband Deutschland (GZVD) e.V. (German raptor breeding association).

It is estimated that about 3,000 persons are keeping birds of prey, falcons and owls in the Federal Republic of Germany for various purposes.

The Federal Republic of Germany has a tradition of being a leading country in falconry and especially in hunting with birds of prey. The production of birds of prey is generating a surplus so that a major number of reproduced species can be exported and made available again for third parties. This fact certainly is an economic aspect, but it should also be valued positively for reasons of the protection of biodiversity.

CONTACT

Deutscher Falknerbund (DFB) e.V.

Chairman Markus Stadolka, Kaitl 1, D-84550 Feichten, Federal Republic of Germany

Phone: +49-(0)-8623-986664 – Mail : info@falknerbund.de

Bundesverband Gewerbliche Falknerei (BGF) e.V.

Managing Director Horst Stamm, Gweng 3, D-84570 Polling, Federal Republic of Germany

Phone: +49-(0)-8631-12345 – Mail : postfach@ibsv-stamm.de

COMMENTS

Three criteria are subject of the current discussion, which are to be evaluated in the following from the point of view of falconry. Insofar the means and the potential prospects of success ought to be considered from this.

The criteria which have to be evaluated are as follows:

1. UNWANTED

In the Federal Republic of Germany there are, which identically is true for many other European countries, non-native species considered by some humans to be pests. Some, such as the Himalayan Balsam (*Impatiens glandulifera*), the Mink (*Neovison vison*) and the Grey Squirrel (*Sciurus carolinensis*) are virtually unanimously considered pests and are unwanted. Total eradication of them is impractical, and our efforts hinge on keeping populations and ranges to a practical minimum.

Other species, such as the Feral Pigeon (*Columbia livia*), the Summer Lilac (*Buddleia davidii*) or also the Common Black Locust (*Robinia pseudoacacia*) while being native, but are considered to be pests and are subject to control programmes.

Whether or not a species is wanted is usually also density dependent. Low numbers may be tolerable, with minimal ecological impact. High numbers may lead to control programmes which may turn out to be expensive. The most serious cause of the stock situation of the native crayfish (*Malacostraca*) being critical even today was the sudden occurrence of crayfish plague introduced with North American crayfish at the end of the 19th century. This highly infectious and for European fatal disease is caused by the Water Mould *Aphanomyces astaci* and made the original population comprehensively vanish in many places. The crayfish plague is the main reason for the fact that even today, in spite of a significant improvement of the general condition of water bodies, all crayfish species native in Germany are included on the Red List of Threatened Species (LfL Sachsen).

The reintroduction of the Grey Wolf (*Canis lupus*) into the Federal Republic of Germany, based on Eastern European stock, as well as the ongoing spreading of the Wild Cat (*Felis silvestris*) will lead to problems with dog and cat owners keeping about 7 million of each of these pets, from which it is proved that hybridizations have taken place with the corresponding wild form, and it must be assumed that such hybrids actually do exist in wild nature. This means that this development will turn out to be uncontrollable in the long term in the case of these two representatives of higher animals, too, unless drastic measures are taken for a reduction of their population or free-running and keeping bans are issued. An implementation of such proposals, however, does not seem to be feasible in practice, because the pressure put on the political decision makers would most certainly prevent that sort of request.

The last situations delineated above, in particular, concerning the Crayfish (Malacostraca) and the Grey Wolf (*Canis lupus*) as well as the Wild Cat (*Felis silvestris*) should give a clear picture of the unavoidable problem faced when formulating any far-reaching measures aiming at creating an environment actually not influenced by humans and requesting a really restrictive policy. Through the international transport routes alone about 3,000 species are crossing national borders every day. This clearly demonstrates that the transport industry has opened up a completely new dimension for invasive species different from what may only be to some extent conceivable in other areas.

2. INVASIVE

Although 'invasive' actually implies a propensity to invade or enter, in this context it is being used to describe a propensity of a species to increase its population once already present. This is not just a question of fecundity. It indicates that the organism is taking up an ecological niche that is either vacant or is occupied by a less competitive genetic population. In some cases the native competitor may not be actually ousted, but gene flow from the alien to the native results in hybrids and eventual loss of the original genetic population.

In the Federal Republic of Germany various species of native and non-native birds of prey are kept and also flown freely, including for hunting purposes.

No breeding of non-native species has been known to occur up till now, because obviously non-native species do not have suitable habitat niches available. The short-term introduction (occurring naturally) of the Pallid Harrier (*Circus macrourus*), the Booted Eagle (*Hieraaetus pennatus*) and the Saker Falcon (*Falco cherrug*) has definitely failed. These circumstances already allow a certain evaluation of matters concerning falconry.

Another kind of situation is to be seen when looking at hybrids of non-native subspecies of native species and at hybrids on species level.

On the one hand it can be assumed that gene parts or even single individuals of non-native subspecies of species that are in their turn native in Germany (*Falco peregrinus*) have penetrated into the population and have thus influenced the gene pool. In view of the fact that the population of the Peregrine Falcon (*Falco peregrinus*) currently is counted approximately at 1,000 breeding pairs in the Federal Republic of Germany it seems safe to assume that any possible influence on the gene pool will have no detrimental effect, and even more that, if such influence had been exerted indeed, this would have led to the consequence that the breeding population today is twice as numerous as it was before the DDT crash with about 500 breeding pairs. Furthermore it is quite certain that non-native subspecies of native species are migrating in from other regions of Europe (in particular migration of female animals) so that alterations of the gene pool (adaptations) are already taking place through this route anyway.

In addition the situation of hybrids on species level has to be taken into consideration. In these cases the probability of a genetic impact is still less likely, even according to the opinion of the German Bundesamt für Naturschutz (BfN), an authority under the

Bundesministerium für Umwelt (German Ministry for the Environment), because both sexes possess markedly lower fertility, both in the first generation and in the second, than pure Peregrines. The genetic selection against them is therefore extreme. Furthermore they have major difficulties in pairing, because either potential partner will fail to respond to the other's courtship signals, and ecologically they are even less able to compete with existing Peregrines because they are so far removed from the optimum wild nature type.

Nevertheless there were two introductions of species hybrids to be observed, but the animals were managed to be captured again. During the 30-year history of modern falcon(-hybrid) breeding no more than just a dozen of such occurrences has been documented worldwide. Seen against the background fact that every year about 2,000 such hybrids are being produced in the Federal Republic of Germany alone, mainly for hunting purposes, any restriction armed with a ban would be absolutely disproportionate since it is obvious that detrimental impacts are not to be observed. Any gene flow which may possibly occur in single cases would clearly be subject to biological marginalisation and exclusion in a wild population without actually having half a chance to exert any consequential influence on that wild stock. This is remarkable especially considering the fact that there are indeed natural hybrids of different bird of prey species occurring in open nature which are, however, not endangering the species as such in any way whatsoever.

3. ALIEN

The word „alien“ means „comes from somewhere else“. This in turn depends on where you put your fence. In the context of Europe, which is a politico-economic construct, the fence does not exist. The barriers to the movements and residency of species are biological barriers, not legal or political ones.

The entire EU is not a manageable unit for wildlife decision making. The variety of habitats, climates and length of land and sea borders with other countries make any 'one size fits all' decisions absurd. Such decisions can at best only be made at the national level.

The numerous sea, air and land entry points, and the biologically unguarded borders, make it impossible to consider the EU as a biological island. It will never, ever, be feasible to control species movements in and out of the EU. Most of these movements are made by the organisms themselves.

The concept of a utopia in which one strolls through a pristine natural ecosystem is but an idealised dream.

NEED FOR LEGISLATION AND OPTIONS FOR LEGISLATION

We are of the opinion that it is indispensable to determine whether any legislation is intended to control entry of an organism into the EU as a whole (impractical), or into one or more of the member states (some potential), or to control the release of an organism from a captive state to a wild state once it is inside a member state (possible, using a black list).

The objectives of the Convention on Biological Diversity of 29 December 1993 are the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources. The Convention specifically addresses the introduction of non-native species. According to that, the contracting parties are obliged to prevent the introduction of, to control or eradicate those alien species which threaten ecosystems, habitats or species.

The Bern Convention of 19 September 1979 requires of the contracting parties that they strictly control and limit the introduction of non-native species. This applies to all exotic forms of life, including hybrid forms. Releasing birds of prey into free flight within the framework of falconry methods (including hunting) is not considered a release in the sense of the Bern Convention. In this connection it has to be stated that no falconer will have any interest in releasing his/her raptor with the aim of actually losing the same. Measures already being taken in this matter are:

- Individual identification by means of ring mark or chip
- Specific training of the raptor with the target to make it return to the falconer
- Supervision during release by the falconer
- Telemetric tracking for control and prevention of loss

As far as falconry is affected as such by an EU directive under discussion it is considered as conceivable, in the course of a balancing of interests with other nature conservation and protection associations, to have the above delineated measures stipulated as standard - insofar as they are not already established as obligatory by other regulations - if non-native species or hybrids are concerned. To complement this the sterilisation (after a scientific evaluation to be mandated for the individual case and a consequent unambiguous recommendation) of such individuals at the beginning of the year following their birth seems to be an acceptable means of making certain the prevention of a possible gene flow and, at the same time, taking animal protection matters into account, and to avoid - unlike in the case of a castration - exerting any influence on the hormone balance of the respective individual animal. This consideration will be of paramount importance in the future particularly with a view to the practice already observed in the case of domestic cats (*Felis silvestris catus*) and the problem of the extension of the habitat of the Wild Cat (*Felis silvestris*) which was mentioned above.

Text with content coordination

Horst Stamm