



THE VOICE OF EUROPEAN HUNTERS

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15/07/2019, Brussels

**To: Mr. Dmytro Razumkov,
Chairperson of the Verkhovna
Rada of Ukraine;**

*Copy to: All-Ukrainian Hunting
Union*

Dear Mr. Dmytro Razumkov,

The European Federation for Hunting and Conservation (FACE) expresses its serious concern about the draft bill No. 3563 of 29.05.2020 *“On Amendments to Certain Legislative Acts of Ukraine Concerning the Protection of Children from Observation of Hunting”*.

FACE represents the national hunting associations from 36 countries in Europe and the collective interest of Europe’s 7 million hunters. Since 1977, FACE is one of the most respected and credible interest groups recognized by the European institutions in all matters related to hunting, wildlife management, animal health and welfare, firearms and the representation of hunters’ legitimate interests. We are long-standing members of IUCN and observers to all major nature conventions (e.g. CITES, CBD, CMS, AEWA, Ramsar, the Bern Convention).

From a legal perspective, the draft bill No. 3563 contravenes Article 2 of the Protocol to the Convention for the Protection of Human Rights and Fundamental Freedoms. More specifically, it violates the constitutional rights of parents to raise children in accordance with their beliefs.

It is a fundamental right for parents to educate children according to their own beliefs and in the best interest of their children. In this context, FACE wants to highlight in particular Article 2 of the Protocol to the Convention for the Protection of Human Rights and Fundamental Freedoms states: *“the State shall respect the right of parents to ensure such education and teaching in conformity with their own religious and philosophical convictions”*.

The legal provisions being considered in the Ukraine further contradict many key principles set out in the Council of Europe’s Charter on Hunting and Biodiversity, which was adopted by the Standing Committee of the Bern Convention in November 2007.

Many European countries have specific laws that promote youth in hunting such as Finland, France, Latvia, Ireland, Denmark, Sweden, Austria and the United Kingdom. These countries allow minors to apply for a firearms/hunting license below 18 years. For example, at the age of 16 years, it is possible to acquire a hunting license in Denmark, Latvia, Germany, Austria and France. In Ireland and the UK, a trainee hunting/firearms license is available from the age of 14. With the exception of Poland, no European country prevents young people (teenagers) from attending hunts. The law in Ukraine would be unjustifiably discriminatory in this regard.



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Importantly, there is a growing trend in youth engagement in hunting in many European countries. The participation of youth in hunting is widely recognized as providing key knowledge about nature and a deep understanding of wildlife management and animal welfare. It is positive for children's mental and physical development.

The potential ban on the participation of youth in hunting *de facto* would eliminate the possibility of transferring hunting traditions and culture to young generations. As you are aware, hunting and game management are essential for taking care of the European countryside, for maintaining optimal numbers of game populations and for the welfare of wildlife. Approximately, 65% of the European countryside is under the influence of hunting management. In this context, hunters are the best and most responsible protectors of the environment and wildlife.

The potential law in this respect in Ukraine would overlook the crucial role of hunting in preventing agricultural damages and managing wildlife diseases such as African swine fever in wild boar. At EU level, hunters of all ages are recognized as being key partners in eradicating ASF in wild boar. It is therefore counter-productive to prevent youth from joining hunts (and hunting in general) when hunters are required to fight these long-term diseases.

From an economic perspective, the turnover generated by hunting also benefits national economies and, at the same time, it is one of the main resources for nature and habitat conservation. Europe's hunters spend 16 billion euro annually. In Ukraine, hunting is part of tradition and cultural heritage. For example, hunting favours strengthening family ties and improving communication between generations. Moreover, this is an important sector of the economy and vital source for livelihood of the Ukrainian citizens.

Nature conservation is a fundamental part of children's education. Hunting is an excellent way to teach children about the species of plants and animals, to have respect and appreciation for the fauna and flora and how to properly behave in nature. It is important for people to connect with nature and understand where food comes from and that hunting is a natural source of organic meat for the household.

The psychological and physical benefits of being in nature have been proven in numerous studies. This is particularly important at a time when computers and social media consume too much time in our daily lives. Participating in hunting is an enjoyable activity and provides a valid purpose for young people to socialise and learn the ethics of sustainability. One problem today is that there is too much sedentary behavior in today's youth, and a lack of spending time outdoors.

Finally, safety is crucial while hunting. Having children present during hunts, accompanying experienced hunters allows them to observe and learn hands-on firearms safety and shot assurance in different circumstances and acquire the necessary habits to become responsible hunters.



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I am happy to discuss the points raised in this letter in more detail.

Yours sincerely,

Dr. David Scallan
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