



THE VOICE OF EUROPEAN HUNTERS

FACE
Rue Belliard 205
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28/10/2019, Brussels

Dear

Henryk Kowalczyk, Minister of the Environment, Poland

Małgorzata Golińska, Secretary of State - Chief Nature Conservator, Poland

Cc. Jarosław Kuczaj, FACE Vice-President, Board Member - Polish Hunting Association

The European Federation for Hunting and Conservation (FACE), which is working in conjunction with its Member, the [Polish Hunting Association](#), expresses its serious concern about the amendment to the Polish Hunting Law in March 2018, which prevents youth (under 18) from attending a hunt.

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 recognised 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 amendment to the provision in the Act 42aa, item 15 of the Hunting Law 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 (Article 48 of the Constitution of the Republic of Poland).

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"*.

This legal provision approved by the Polish Senate to the Hunting Law in March 2018 further contradicts 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.

To put this issue in a broader European context, FACE recently conducted an analysis of the relevant national hunting laws in Europe. Our review confirmed that Poland is the only European country to impose a minimum age of 18 years old to be allowed to be present during a hunt. Many European countries have specific laws that promote youth in hunting such as Finland, France, Latvia, Ireland and United Kingdom. These countries allow minors to apply for a firearms/hunting licence below 18 years and, under certain conditions, start hunting. For example, in Ireland and the UK, a trainee license is available from the age of 14. The law in Poland is 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 recognised 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 ban on the participation of youth in hunting *de facto* eliminates the possibility of transferring hunting traditions and culture to young generations. As your ministry is 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 law in this respect in Poland overlooks 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 recognised 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 Poland, hunting is part of tradition and cultural heritage. For example, hunting favours strengthening family ties and improving communication between generations.

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 behaviour 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 would like to schedule a meeting with you in Warsaw with Mr. Jarosław Kuczaj to discuss the points raised in this letter in more detail. We would like to focus, in particular, on the Polish constitution and European Convention on Human Rights. I look forward to hearing from you with suitable dates for such a meeting.

Yours sincerely,

Dr. David Scallan
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