

**International Single Species Action Plan for the Western Palearctic
Population of the LESSER WHITE-FRONTED GOOSE, *Anser erythropus***

Comments from NORWAY on Version 3.0. - Third and Final Draft, May 2008

Reception date: 2 July 2008 (email)

To the AEWA Secretariat

I refer to the invitation to comment on the SSAP on LWfG within the set deadline of July 4th 2008.

We wish to commend the Secretariat for its engagement and really look forward to concluding the task of producing a SSAP for this highly threatened species. It is crucial that the secretariat adheres to the deadlines as set by the Parties to the MoP, so as to avoid any chances of the document having to be postponed and forwarded to MoP5. Either way the document exists and should be used by all concerned Parties.

We have been in close contact with the Finnish representatives on this issue, and we refer in general to their comments, which we support.

It is of much concern to us if the document gives an impression of focusing on the reintroduction programmes. This also violates the opinion expressed by all Parties to the CMS Scientific Committee in 2005. We support the proposal to refer as much as possible of this text to the annex section.

We would like to see more commitment from the EU related to their member states (e.g. Bulgaria and Greece). We expect that the EU shall take the situation in these countries with a high degree of concern and seek to comply with EU regulations and conclusions as given by the European Court of Justice. We propose to you to add a sentence making this expectation clearer.

On page 48 we note that it is referred to the Fennoscandian population as not declining and consisting of 1000 individuals. If this population included the Western Siberian we may agree. We propose that the wording and these figures be rechecked.

The most important part of the plan is of course chapter 6 on activities. Under 'result 1' (see also Table 8 (results)), we propose to add the following activities:

1. Implementation of obligatory training of hunters, cf also Hunting Charter as accepted by the Bern Convention (November 2007). This applies in particular to Eastern European countries.
2. Information campaign, through leaflets etc and engagement of local hunter organisations, European hunter organisations and nature protection NGOs
3. Upgrading of the level of protection within existing protected areas against illegal hunting, training of local rangers, securing funding for salaries etc.

We propose that the time frame of the plan be set to 5 years from date of acceptance of the MoP4. After this a revision of the SSAP is expected and evaluation of the results achieved will decide on the future direction and activities.