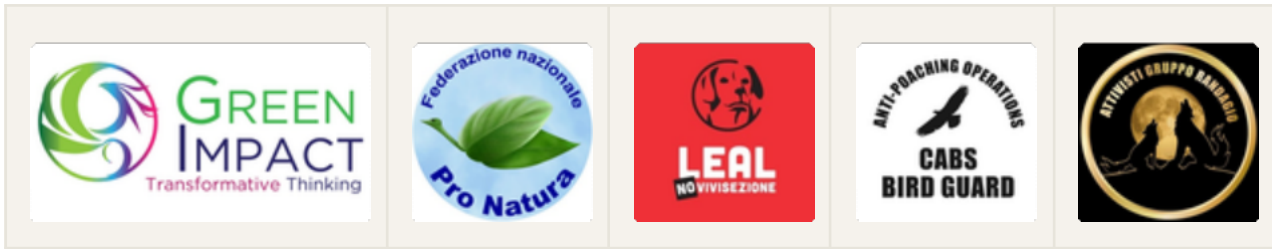


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Open Letter

To: The Honourable Elly Schlein, National Secretary of the Democratic Party; The Honourable Giuseppe Conte, President of the Five Star Movement; The Honourable Nicola Fratoianni and The Honourable Angelo Bonelli, Co-spokespersons for the Green and Left Alliance

CC: Virginia Libero, National Secretary of the Young Democrats Rome,

Request. 21 September 2026 moratorium on hunting activities in the regions governed by the 'broad coalition' parties (Tuscany, Emilia-Romagna, Sardinia, Umbria, Apulia, Campania), in line with the positions expressed by those same parties in Parliament regarding the progress of the Hunting Bill (AC No. 2984, already approved by the Senate as AS No. 1552).

Jointly promoted by: Green Impact ETS | Randagio Group Activists – ODV | National Pro Natura Federation | LEAL – Anti-Vivisection League | CABS – Committee Against Bird Slaughter

Hunting: the regions governed by Campo Largo must now change course and immediately introduce a moratorium to align themselves with the battle in Parliament against the Hunting Bill

Wildlife is a non-disposable asset of the State. The protection of wildlife and biodiversity is a duty both in Parliament and in the regions

Dear Sir or Madam,

In our capacity as representatives of Green Impact ETS, Attivisti Gruppo Randagio – ODV, the Federazione Nazionale Pro Natura, LEAL – Lega Antivivisezionista and CABS – Committee Against Bird Slaughter, organisations active in the protection of wildlife, biodiversity and animals, We are writing to you regarding the dire situation facing wildlife, which is partly due to its management and inadequate hunting legislation, and, in particular, to draw your attention to a contradiction that we believe can no longer be postponed: whilst at national level opposition parties are rightly denouncing the dismantling of environmental protections currently underway, in numerous regions

In recent years, the very same political parties have authorised decisions on hunting matters that do not appear consistent with that very cause. This inconsistency is no longer tolerable in the eyes of the associations which, year after year, undertake a heavy burden of advocacy and legal protection work, nor in the eyes of the citizens who devote their time, energy and resources to this cause, often on a voluntary basis. This is by no means a marginal endeavour: the Italian third sector, of which our associations form part, currently generates an estimated economic value of over 100 billion euros (4.5–5 per cent of national GDP), with approximately 400,000 active organisations and one million employees (Aepi Confederation based on Istat data, 2025–2026) — a 42 per cent increase compared with the 70.4 billion recorded by Istat in 2015. This is a sector that generates real public value and deserves consistency, commitment and, above all, results from politicians for the common good.

1. The overall picture: hunting legislation that is out of control

Parliament is currently pushing ahead, through the so-called Hunting Bill (AS No. 1552, now AC No. 2984, with Senator Lucio Malan), the most extensive deregulation of hunting since 1992: an expansion of hunting areas and seasons, including state-owned and forested areas; a redefinition of the hunter as a ‘bioregulator’ of wildlife — a definition that is unscientific, devoid of biological meaning and lacks any basis in established ecological literature; an increase in the number of species that may be hunted; the downgrading of ISPRA’s opinion from binding to advisory; the recognition of foreign licences as equivalent; and the use of optical sights. The bill, approved by the Senate on 23 June 2026 (80 in favour, 56 against, 2 abstentions), is now under consideration by the Chamber of Deputies’ Agriculture Committee.

This drift is in direct conflict with the constitutional and European framework. Article 9, paragraph 3, of the Constitution requires the Republic to protect the environment, biodiversity and ecosystems, including in the interests of future generations: a ‘mandate to protect’ which, as clarified by the Constitutional Court (judgement no. 105/2024), binds every level of government to its ‘effective defence’ and is viewed through the ‘prism of European and international obligations’ — from the 1979 Bern Convention, through the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC), which form the basis of the Natura 2000 network, to the recent EU Regulation on nature restoration (Nature Restoration Law, EU Reg. 1991/2024). Wildlife, which constitutes the State’s inalienable heritage pursuant to Article 1 of Law 157/1992, cannot be managed as a matter of local political appropriation, nor can the freedom of the parliamentary mandate (Article 67 of the Constitution) be interpreted as a constraint in favour of sectoral interests.

The figures, after all, paint a picture that is far removed from the narrative of a hunting ‘lobby’ that wields decisive influence at the ballot box. According to a survey based on a general request for access to regional data on hunting licences (LAC, 2026), the number of active hunters in Italy during the 2025/2026 season stood at 429,484 — just 0.8 per cent of the resident population, down 2.7 per cent on the previous season. This

This population is 98 per cent male, concentrated in the 60–80 age group, with less than 3 per cent of licence holders under 30 and a projected electoral weight of 0.3–0.4 per cent by 2030.

In contrast to this extremely narrow social base, Italian public opinion is clearly leaning in the opposite direction: according to surveys by Ipsos and the Piepoli Institute for the Capellino Foundation (October 2025), 94 per cent of Italians are calling for the abolition, severe restriction or, at the very least, the retention of the current hunting legislation; 78 per cent consider it ethically unacceptable; 85 per cent perceive it as a serious risk to public safety; 61 per cent say they are opposed to Bill 1552. The European Commission's 2026 Special Eurobarometer on Biodiversity also confirms this picture: 96 per cent of Europeans recognise the collective responsibility to care for nature, whilst 94 per cent consider biodiversity essential for long-term economic development.

The risk to public safety is not a matter of perception, but a documented fact: according to the National Observatory on Hunting Victims (AVC), the 2025/2026 season alone recorded 42 victims (11 fatalities, 31 injuries), 13 of whom were not involved in hunting — hikers, farmers and residents struck whilst going about their normal daily lives. Overall, in recent years, the Observatory has documented hundreds of injuries and over two hundred deaths linked to hunting; a picture confirmed, albeit using more restrictive methodologies, by surveys carried out by the University of Urbino. The risk, however, does not end with the close of the regular hunting season: on 14 March 2026, in Montegranaro (Fermo), a 43-year-old man with no connection to hunting was killed by a rifle shot fired accidentally during a hunting party, after he had approached to protest against the gunfire disturbing the horses at a nearby riding school.

From an economic perspective, too, weakening nature conservation means undermining one of the country's structural assets, not freeing up resources. According to the Sixth Report on Natural Capital in Italy (MASE, 2024), ecosystem degradation already costs around 3 billion euros a year, with an estimated cumulative impact of 60 billion by 2050, compared with a total value of Italian ecosystem services estimated at between 24 and 58 billion euros annually; every euro invested in nature restoration can generate up to 38 euros of added value (European Commission, Impact Assessment on the Nature Restoration Law). The European Central Bank notes that 72 per cent of non-financial firms in the eurozone depend on at least one ecosystem service, and that 75 per cent of bank loans in the eurozone are linked to activities that are themselves dependent on natural ecosystems. Italian tourism — with total expenditure of €122.6 billion in 2024 (ENIT) and the second-highest number of international visitors in Europe — relies largely on its natural and landscape heritage, with sustainable tourism growing steadily and 64 per cent of tourists stating that they are influenced by environmental considerations in their travel choices (71 per cent among the under-35s).

2. Regional contradictions: where the Campo Largo holds sway, hunting is on the rise

Regional decisions on hunting do not reflect the position expressed by the same parties in national parliamentary forums. In many cases, these decisions have been taken in deviation from the technical and scientific opinion of ISPRA — the Higher Institute for Environmental Protection and Research, the State's leading technical body on wildlife matters. ISPRA's opinion is to be regarded as binding until such time as a substantiated justification is provided to account for any deviation from it, based on evidence of equal scientific standing: administrative case law has in fact clarified that a hunting calendar cannot deviate from it without such a justification, which must account for the scientific basis of the deviation itself. It is not sufficient merely to disregard the technical guidance: it must be justified. It is precisely this obligation that the Regions examined here, in the majority of cases, fail to fulfil, proceeding to authorise hunting without any supporting technical or scientific basis: a lack of justification which, over the years, has allowed the killing of tens of thousands of animals, and which has, at the same time, constituted the legal loophole through which administrative courts have repeatedly suspended regional hunting calendars.

The regions governed by parties in the 'broad coalition' present a common picture: the authorisation of hunting of species in a critical conservation status or at risk, often through early opening of the hunting season, and wildlife management plans based almost exclusively on direct culling, rather than on precautionary, ecosystem-based and non-lethal approaches. In this way, year after year, public resources continue to be channelled into the hunting sector, whilst at the same time causing environmental damage at the expense of the common good that wildlife represents: the very ungulates that a functioning ecosystem would entrust to the control of natural predators — first and foremost the wolf — are instead culled at public expense, whilst the wolf performs that same regulatory function free of charge. The case of Tuscany is emblematic: on 16 September 2026, President Eugenio Giani (PD) spoke in person at a meeting attended by over

1,000 hunters, organised by Federcaccia Toscana-UCT in Donoratico, emphasising the importance of a sector that accounts for less than 1 per cent of those eligible to vote — comprising almost exclusively men, the vast majority of whom are in the 60–80 age group — and whose activities essentially amount to the killing of living beings that form part of our collective heritage.

The picture that emerges from these cases is not one of wildlife management in the true sense of the term, but of an administrative practice that has proved to be essentially a failure, causing environmental damage documented by the technical reports themselves — primarily those of ISPRA — systematically disregarded. Year after year, as each hunting season draws to a close, the same culling plans are put forward, without any real investment in ecological and non-lethal wildlife management solutions. Wildlife management must

be geared towards safeguarding animal welfare and fostering coexistence in human-influenced environments. This approach revives and updates the original spirit of Law 157/92 concerning the rescue of wildlife in distress.

The principle of rescue under Law 157/92: the framework legislation has always entrusted the Regions with the task of managing the rescue of wildlife in distress. Today, this key principle must be vigorously applied to the modern phenomenon of ‘urbanised wildlife’: animals that have established their habitat in towns and cities and which require specific protection, no longer interpretable through the old logic of confinement solely to agricultural, forestry and pastoral areas.

The role of CRAS (Wildlife Rescue Centres): CRAS are not merely care facilities, but essential ecological and health centres for the local area. Their work comprises:

- Care and rehabilitation: prompt intervention, hospitalisation and reintroduction into the wild of animals that are injured or in distress in urban environments.
- Epidemiological monitoring: active public health surveillance across the region to prevent zoonoses and protect public health.

This is a situation we consider scandalous on both scientific and political grounds: the routine repetition of a model that has already been shown to be ineffective cannot be mistaken for a policy of protection.

It is worth reiterating, once again, the context in which these decisions are being made: we are experiencing what the scientific community refers to as the sixth mass extinction, and in Europe, 63 per cent of assessments on the conservation status of species protected by the EU’s nature directives are classified as ‘unfavourable’ (European Environment Agency, State of Nature in the EU). Projections regarding heatwaves and wildfires, which are becoming increasingly frequent and intense, represent an additional source of pressure on already fragile populations. It is no longer acceptable to authorise the killing of wild species for recreational purposes, nor to continue devising wildlife management plans in which culling is the first option rather than the last.

3. The paradox of public funding: poor management is funded by the public

Added to this picture is an even more glaring contradiction concerning the use of public resources. The wildlife management system currently in place has not only proved ineffective in limiting the damage it claims to wish to prevent, but also appears to be structured in such a way as to systematically divert public funds towards the hunting sector

— even when the very root of the problem stems from the decision to use culling as a means of population control.

The case of the wild boar is emblematic — not because the species is ‘overpopulated’ in absolute terms, but because culling has proved to be a structurally inadequate means of regulating its presence in the area. ISPRA itself (at the time the National Institute for Wildlife) acknowledged in the National Guidelines for the Management of the Species that, amongst the causes of the wild boar’s expansion, ‘introductions for hunting purposes, which began in the 1950s, have certainly played a fundamental role’ — a practice which, as a result of cross-breeding with farmed animals, has led to widespread hybridisation with the domestic pig (ISPRA, Carnevali, Pedrotti, Riga, Toso, Ungulate Database, 2009). Despite the ban on new releases introduced by Law 221/2015 and an estimated total cull of 350,000–370,000 animals per year through hunting (around 300,000) and control programmes (50,000–70,000), the problem shows no sign of abating: proof that the ‘culling as the sole response’ model is not the solution, but part of the problem. Confirming this, a study by Prof. Andrea Mazzatenta (University of ‘G. d’Annunzio’, Chieti-Pescara), based exclusively on official data from Italian public bodies and published in 2026 in the international scientific journal **Conservation**, demonstrates that the intensification of culling is not associated with a decrease in the wild boar population, but appears to be correlated with an increase: the culling of dominant females, in fact, would disrupt the natural mechanisms of reproductive control based on pheromonal communication, freeing younger females from any inhibitions and leading to a surge in births (Mazzatenta, ‘Wild Boar Management and Environmental Degradation: A Matter of Ecophysiology — The Italian Case’, *Conservation*, 2026). An ecosystem-based approach to ungulate management places the wolf at its centre — the apex predator which, in a functioning ecosystem, naturally regulates their presence in the area. Yet this is an animal that is itself persecuted, whose protection is now being undermined at European level, whilst public resources continue to be invested in a measure — the direct culling of ungulates — which the scientific literature indicates is ineffective in the medium term.

The African Swine Fever (ASF) health emergency, which is partly rooted in this very same failed management model, has resulted in a new, substantial flow of public funds towards the hunting sector: the 2025 Omnibus Decree has allocated 13 million euros for measures to capture, cull and dispose of carcasses; the Emilia-Romagna Region alone has allocated €1.8 million in 2026 to wild boar control plans (an increase on the €1 million allocated in 2025), implemented through agreements between the Region, the Provinces and the Territorial Hunting Areas (ATC).

In the face of these trends, the resources allocated to non-lethal prevention and wildlife rescue remain minimal. The National Wildlife Recovery Fund, established under the 2020 Budget Act to support the Wildlife Recovery Centres (CRAS) run by environmental organisations, is reallocated a mere 1 million euros a year. Some regions allocate even smaller sums to the CRAS: Sicily, which since 1997 (Regional Law

(Law No. 33 of 1997) had committed to providing each of the nine provinces with a rehabilitation centre, yet today it allocates a mere 70,000 euros a year to the entire regional network — funds that are wholly insufficient even for the day-to-day running of the three existing centres.

The picture that emerges is not that of a system which makes mistakes by accident, but of a system structured to repeat those mistakes: the very practices that have contributed to creating these imbalances are rewarded, year after year, with new public funding, whilst prevention, deterrence and rehabilitation — the only practices that the scientific community identifies as effective in the medium term — remain structurally overlooked and therefore underfunded. We call for this issue to be included on the political agenda addressed by this letter, starting with a substantial rebalancing of the criteria for allocating public expenditure on wildlife management.

Concluding requests

Six regions, different majorities, yet one constant: national political affiliation does not translate, in regional administrative practice, into a coherent policy for the protection of wildlife. It is this gap between words and deeds that we ask you to remedy. We therefore expect a clear and urgent change of course, which must be reflected in three concrete and immediately enforceable measures:

1. an urgent moratorium on regional hunting calendars, which will finally allow legislation and science to be brought back into alignment;
2. the adoption, by the start of the next season, of wildlife management plans based not on culling, but on ecological principles and on preventive, non-lethal measures;
3. the introduction of regional laws that permanently enshrine an absolute ban on hunting in protected areas, nature reserves and Natura 2000 sites — a ban that is currently being systematically flouted — and the precautionary suspension of hunting in areas affected by wildfires or heatwaves, to protect wildlife already weakened by habitat loss and climate-related stress.

The undersigned associations are, moreover, already involved in three separate legal challenges against the hunting calendars of Sicily, Tuscany and Lazio, confirming their determination to continue this battle at every institutional level.

We remain at your disposal to provide, where appropriate, further technical, scientific and regulatory documentation in support of the above, and we trust in your prompt and concrete intervention.

Yours faithfully,

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Andrea Rutigliano — Italian Representative, CABS – Committee Against Bird Slaughter — cabs.italia@komitee.de

Sources and references

Legislation and administrative acts cited in the text with full references (Constitution, laws, directives, regional resolutions, court rulings) can already be identified by the number/date given in the body of the letter. Additional sources are listed below, with direct links where available.

Section 1 — The general overview

- Number of hunters (429,484, 2025/2026 season): League for the Abolition of Hunting (LAC), survey based on freedom of information requests for regional data, 2026 — <https://www.abolizionecaccia.it/blog/associazioni-venatorie-e-voto-di-scambio/> ; reproduced from **Il Fatto Quotidiano**, 6 September 2026 — <https://www.ilfattoquotidiano.it/2026/09/06/cacciatori-italia-numeri-reali-notizie/8496827/>
- Hunting victims, 2025/2026 season (42 victims, 11 fatalities, 31 injured): AVC — Hunting Victims Observatory, 19th Annual Report, press release of 2 February 2026 — <https://www.vittimedellacaccia.org/avc-dossier-2025-2026-intro/>; data taken from Italiaambiente, 2 February 2026 — <https://www.italiaambiente.it/2026/02/02/chiusa-la-caccia-11-morti-e-31-injured-according-to-the-victims'-association/> (*note: the figure of 13 non-hunters cited in the letter combines hunting and non-hunting incidents from the AVC Dossier; the source summarises one fatality and nine injuries to non-hunters in hunting incidents alone — please check the details in the full Dossier before sending*)
- Senate vote on the Hunting Bill (23 June 2026, 80 in favour, 56 against, 2 abstentions): ANSA, 23 June 2026 — https://www.ansa.it/sito/notizie/politica/2026/06/23/ok-del-senato-al-ddl-caccia-con-80-si-e-56-no_fb95e477-588e-4bf0-bfa0-07e60e9d85ec.html
- The Italian Third Sector: economic value and employment: Aepi Confederation based on Istat data, as reported by ANSA, 1 March 2026 — https://www.ansa.it/sito/notizie/economy/2026/03/01/aepi-third-sector-value-over-100-billion_5912d7c1-86eb-4585-a8c7-3408ab9a1248.html
- Impact Assessment of the Nature Restoration Law (€8–38 in benefits for every euro invested in nature restoration): European Commission / CINEA, 12 July 2023 — https://cinea.ec.europa.eu/news-events/news/new-nature-restoration-law-boosts-biodiversity-and-climate-action-across-europe-2023-07-12_en

- Comparative data from the University of Urbino: Uniurb press release, 3 February 2026 — <https://www.uniurb.it/comunicati/48401>
- Montegranaro incident (14 March 2026): ANSA Marche, 14 March 2026 — https://www.ansa.it/marche/notizie/2026/03/14/a-gunshot-was-fired-during-a-hunting-expedition-one-man-killed_d182ede1-a490-4ea8-896d-b60db3fe3d2c.html ; Sky TG24, 14 March 2026 — <https://tg24.sky.it/cronaca/2026/03/14/uomo-morto-caccia-montegranaro-colpo-fucile>
- Ipsos/Istituto Piepoli survey for the Capellino Foundation (October 2025), Eurobarometer on biodiversity 2026, Sixth Report on Natural Capital in Italy (MASE, 2024), ECB data and ENIT tourism data for 2024: included in the original draft, not verified with direct links in this section — *to be confirmed with the original source before submission*

Section 2 — Regional contradictions

- Regional resolutions (Tuscany, Emilia-Romagna, Sardinia, Umbria, Apulia, Campania): identified by number and date in the text; full text available in the regional Official Gazettes.
- Governments of the regions mentioned (centre-left/‘broad coalition’, verified September 2026): Sky TG24, map of governors — <https://tg24.sky.it/politica/approfondimenti/partiti-regioni-italiane-mappa> ; ItaliaOggi — <https://www.italiaoggi.it/le-guide-per-tutti/chi-governa-le-regioni-italiane-la-mappa-dei-presidenti-in-carica-tra-centrodestra-e-centrosinistra-o38lhp9w>
- Giani’s attendance at the meeting with hunters in Donoratico (16 September 2026): Caccia Passione, 17 September 2026 — <https://www.cacciapassione.com/eugenio-giani-esalta-i-cacciatori-e-non-e-neanche-la-prima-volta/> ; Caccia e Tiro — <https://www.cacciaetiro.it/in-mille-a-donoratico-per-il-confronto-sul-futuro-della-caccia-toscana/>
- Conservation status of species protected by EU directives (63 per cent of assessments classified as ‘unfavourable’): European Environment Agency (EEA), “State of nature in the EU — Results from reporting under the nature directives 2013–2018”, 2020 — <https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020>

Section 3 — The paradox of public funding

- Silvano Toso, National Guidelines for Wild Boar Management, INFS/ISPRA; ISPRA — Carnevali, Pedrotti, Riga, Toso, Ungulate Database, 2009.
- Andrea Mazzatenta (University of ‘G. d’Annunzio’, Chieti-Pescara), ‘Wild Boar Management and Environmental Degradation: A Matter of Ecophysiology — The Italian Case’, Conservation, 2026, 6(1), 9 — <https://doi.org/10.3390/conservation6010009>

- Law No. 221 of 28 December 2015 (Environmental Annex), prohibiting the release of wild boars.
- Omnibus Decree 2025 (€13 million for PSA containment): *QuotidianoSanità*, November 2025 — <https://www.quotidianosanita.it/governo-e-parlamento/peste-suina-africana-arriva-la-nuova-ordinanza-in-campo-anche-le-societa-concessionarie-autostradali-per-costruire-le-barriere-e-the-omnibus-decre-e-allocates-millions-of-euros-for-the/>
- Emilia-Romagna Region, call for tenders for wild boar/ASF control plans 2026 (€1.8 million): *ParmaToday*, 11 June 2026 — <https://www.parmatoday.it/attualita/peste-suina-cinghiali-gara-regione.html>
- 2020 Budget Act, establishment of the Fund for the Recovery of Wildlife (CRAS): *ANMVI Today*, January 2023 — <https://www.anmvioggi.it/rubriche/attualita/73729-cras-rifinanziato-il-fondo-per-il-recupero-della-fauna-selvatica.html>
- Sicilian Regional Law No. 33 of 5 May 1997, establishing the regional CRAS network.

Table of regions governed by Campo Largo that have authorised hunting and selective hunting, with some also permitting early opening dates

Region	President	Party	Coalition Parties
Tuscany	Eugenio Giani	PD	PD, Alliance of Greens and the Left, Five Star Movement, Reformist Alliance (Italia Viva, +Europa, PSI)
Emilia-Romagna	Michele de Pascale	PD	PD, Five Star Movement, Alliance of Greens and the Left, civic lists (Civici con De Pascale, Emilia-Romagna Futura – Riformisti)
Sardinia	Alessandra Todde	M5S	M5S, PD, Alliance of Greens and the Left, Progressives, Sinistra Futura, Orizzonte Comune, civic lists
Umbria	Stefania Proietti	PD	PD, Five Star Movement, Alliance of Greens and the Left
Puglia	Antonio Decaro	PD	PD, Five Star Movement, civic lists (Decaro Presidente, Per la Puglia), Alliance of Greens and the Left
Campania	Roberto Fico	M5S	PD, Five Star Movement, Alliance of Greens and the Left, PSI, civic lists