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Submission by Switzerland of comments on documents proposing amendments for upcoming Meeting of the Signatories to the Raptors MOU (MOS4) in Zimbabwe, December 2026

Dear Umberto,

Thank you for the opportunity to provide comments on the documents prepared for the Fourth Meeting of Signatories to the Raptors MOU (MOS4), taking place from 30 November to 2 December 2026 in Victoria Falls, Zimbabwe.

Switzerland appreciates the work undertaken by the Coordinating Unit and the Technical Advisory Group (TAG) in preparation for MOS4. We would like to provide the following comments specifically on UNEP/CMS/RAPTORS/MOS4/Doc.14.4 concerning the proposed approach to reviewing and updating Table 3 of Annex 3 to the Raptors MOU.

Switzerland reiterates the position communicated in the context of MOS3 in 2023. In Switzerland, the Important Bird and Biodiversity Areas (IBAs) were identified by SVS/BirdLife Switzerland and the Swiss Ornithological Institute on the basis of international IBA criteria. These sites have not been officially recognised by the Swiss Confederation or the cantons. Already during the third meeting of the Technical Advisory Group in 2018, Switzerland explained that the proposed IBAs were not considered the appropriate sites for the protection of migratory birds of prey in Switzerland. Switzerland therefore does not support the inclusion of the Swiss sites identified in Annex A to Doc.14.4 in Table 3 on the basis of their designation as IBAs.

For the identification of important sites for raptors in Switzerland, Switzerland continues to consider the national conservation strategy "Raptor and Owl Conservation in Switzerland: Strategic Guidelines and Management Priorities", developed in 2019 pursuant to paragraph 12 of the Raptors MOU, as the appropriate national strategic basis.

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Against this background, Switzerland asks that the current status of the Swiss sites in Table 3 remain unchanged and reiterates its position communicated in the context of MOS3 in 2023. We would be grateful if this position could be taken into account in the further review and updating of Table 3 and reflected appropriately in the documentation of MOS4.

Thank you for your consideration. Please do not hesitate to contact us if you have any questions.

Yours faithfully

Federal Office for the Environment



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