

Open letter

A coalition of Romanian organizations and scientists send a call to the international community to save Romanian bears

Object: Stop/ Improve Romania's Action Plan resuming trophy hunting of brown bears threatening the species' conservation status

The signatories of this letter are calling on the international community of wildlife experts, as well as Romanian and EU decision-makers, to take urgent action to address the worrying situation for brown bear populations in Romania. We ask that they join us in asking Minister of the Environment, Mrs. Gratiela Gavrilescu, not to endorse the *Action Plan for Conservation of the Brown Bear in Romania*, which allows the hunting of up to 10% of the brown bear population, whose status and trends are currently unknown. Instead, we call on the Minister to ensure that brown bear management in Romania be based on the goal of human-bear coexistence, that non-lethal methods to mitigate human-bear conflict are exhausted before lethal measures are considered, and that any hunting quota is based on solid and independently-gathered scientific data, in order to ensure the long-term conservation of this species of community interest.

In July, 2017, the Minister of the Environment published an *Order to Approve the Level of Intervention for Bears and Wolves Species in the Interest of Health and Safety of the Population and in Order to Prevent Serious Damage*. Following this publication, our organizations expressed concern about the involvement of trophy hunting in the mitigation of human-bear conflict. In past cases where this was permitted, for example in the United States, it left room for extreme abuse whereby the lethal take quota was monopolized by the hunter and employed without adequate scientific justification, or the consideration of non-lethal options.

In early April of this year, the Minister of the Environment published an *Action Plan for Conservation of the Brown Bear in Romania*, which allows the hunting of 10% of the population, estimated by the authorities to be in the range of 6 050 - 6 640 bears. Notably, there is no independent assessment for the validity of such data, nor the authorities were willing to provide access of external experts to their methodology. Such a quota will allow the harvest or capture of more than 600 brown bears each year for the foreseeable future. Our organizations strongly oppose the Action Plan that plays into the hands of trophy hunting outfitters eager to sell bear trophy hunts again. It is no secret that public and private game managers are the beneficiaries of much of the revenue generated by hunting activities. Brown bear trophy hunts are sold for between 5,500 and 15,000 euros in Romania, depending on the size of the targeted animal.

We call on the international bear expert community to join us in denouncing the arbitrariness of the Ministry's decision to issue such a high hunting quota while not developing and implementing adequate monitoring programs and sustainable management plans for brown bears prior to determining quotas. This Action Plan will allow the killing of a vast number of bears each year despite the absence of valid, externally-vetted scientific information about the size of the population, or other important population parameters such as natality, mortality, reproductive rates, growth and dynamics of the bear population in Romania. We consider that the population estimates and the measures proposed in the actual Action Plan are based on unreliable data and flawed analyses. The proposed 10% quota is completely arbitrary, and not grounded in ecological and biological realities. The population growth rates in the majority of world's brown bear populations are around 5%. The hunting quota could very well exceed the natural growth rate of the population which would seriously risk irreversible decline of brown bears in Romania and represent a direct threat to the conservation status of the species.

We call on the European Commission to carefully review the scientific and legal justifications of this Action Plan as we consider to be in breach of the EU Habitats Directive. The Habitats Directive lists the brown bear as a strictly protected species of community interest, thus prohibiting the capture or killing of individuals of the species located in their natural environment, as well as the deliberate disturbance during the period of breeding, growing, hibernation and the holding, transportation, selling or trading the species taken from their environment. The EU Habitats Directive grants Member States the right to use derogations allowing management control of protected large carnivores at the national level to stop “serious damage” to livestock and crops and to protect the public’s health and safety provided there is *“no satisfactory alternative and the derogation is not harmful to the maintenance of the populations of the species concerned.”* We believe this Action Plan does not provide any “satisfactory alternative” before relying on lethal management control and does not ensure the 10% hunting quota won’t be “harmful to the maintenance of the populations” in the absence of reliable data.

The brown bear is recovering from a history of prolonged overexploitation in Europe stretching back centuries that has resulted in the elimination of brown bears from many European countries. We believe it is crucial that we identify precisely and properly address the problems Romanian citizens are facing due to the presence of brown bears in some areas, and that we find targeted and viable solutions that resolve and reduce these human-wildlife conflicts to ensure the safety of citizens and the override of damages caused, as well as species conservation. In any case, these human wildlife conflicts should not be used as a means to serve the trophy hunting industry’s commercial interests and should be tackled with proper prevention measures rather than hunting (which has proved to be highly inefficient in the last 10 plus years in reducing and preventing conflicts).

We are calling on the international community of wildlife experts as well as Romanian and EU decision makers to ask Minister Gavrilescu to cancel the issuance of this Action Plan and provide scientifically based justifications before endorsing any management measures that can severely compromise the integrity of the brown bear population.

We are attaching for your consideration and review the English version of the Action Plan which supports all our concerns related to the long-term conservation of the species.

With thanks and best regards,

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