



INTERNATIONAL ASSOCIATION FOR BEAR RESEARCH AND MANAGEMENT

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András Demeter, Ph.D.
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Directorate-General for the Environment
Directorate B – Nature, Biodiversity and Land Use
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RE: International Association for Bear Research and Management position statement on the use of hunting as a means of managing brown bear (*Ursus arctos*) populations in range countries of the European Union (EU)

Dear Dr. Demeter:

The International Association for Bear Research and Management (IBA) urges the EU to give due consideration to member states or countries acceding to the EU that express the wish to apply for a derogation to the application of the “strict protection” criteria under the EU Habitats Directive for the purpose of maintaining or establishing managed bear hunting, provided certain criteria are met, as detailed herein.

Background

The International Association for Bear Research and Management (IBA) The IBA is a non-profit organization open to professional biologists, wildlife managers, and others dedicated to the conservation of all bear species (www.bearbiology.com). The organization has over 550 members from over 65 countries. It supports the scientific management of bears

through research and distribution of information. The IBA sponsors international conferences on all aspects of bear biology, ecology and management and publishes as peer-reviewed scientific papers in the journal *Ursus*.

The eight bear species of the world pose significant research and management problems to governments, local authorities, wildlife biologists, land managers, park personnel, tribal councils, and private land owners. The public endures hardships caused by bears; the public wants bears to survive. Management responsibility for the bears and their habitats rests with numerous national and local agencies and councils. Encroaching civilization, involving land-use conflicts and resource utilization by human beings, has resulted in the decline or disappearance of bear habitat and bear populations in portions of their ranges. Continued viability of populations and the possible restoration of bears in certain areas, will be largely contingent upon a cooperative approach towards research, management, land use, and education, and will increase in cost as land values escalate. The IBA, an association primarily of professional biologists with an interest in bears, recognizes these difficult bear research and management problems faced by agencies and governments. The goal of the IBA is to promote the conservation and restoration of the world's bears through science-based research, management and education.

Hunting of bears

In all of the present member countries of the EU, the brown bear is listed as "species of community interest in need of strict protection" in Annex IV of the Council Directive 92/43/EEC, Conservation of Natural and Wild Fauna and Flora (ABL L 206, 22.07.1992). The only time a country can negotiate which annex brown bears within its borders should be placed in, is at the point of entry into the EU. However, current EU legislation does not show a connection between brown bear population status and annex designation, and there are no mechanisms to up-list or down-list a designation once a country has joined the Union. According to Article 16 of the Habitats Directive, the taking of a limited number of bears is allowed only under a certain set of conditions, provided that there is no satisfactory alternative and the derogation is not detrimental to the maintenance of the populations of the species concerned at a favorable conservation status in their natural range.

The IBA asserts that it is crucial to recognize that large carnivore conservation in Europe, including brown bears, must occur in a multi-use landscape. While large areas of Europe offer potential habitat for brown bears, very few large wilderness areas are left, and there is a

great variation in habitat and landscape, patterns of forestry, agriculture, livestock husbandry, socio-economic development as well as attitudes towards brown bears. Bear populations ultimately must be managed in such a human-dominated landscape. Hunting can be beneficial and an important tool for management of wildlife populations, if sustainable and compatible with the conservation goals of the Habitats Directive. Consequently, hunting, to be sustainable, must meet a number of rigorous criteria, including, but not limited to, the following:

- Hunting has to be carried out as part of a Conservation and Management Plan (hereafter, Plan) that has a solid scientific basis with a monitoring program in place, to allow for the collection of biological data as well as distribution and population trends.
- The Plan should be drafted by involving affected people and recognized conservation groups through stakeholder consultations.
- The Plan should clearly spell out the quota allowed and defined season(s).
- Non-hunting mortalities that are human-caused (e.g., bears killed in vehicle collisions, management removals) should be taken into consideration when setting hunting quota.
- The Plan must be adaptive: when monitoring data indicate population changes that deviate from population objectives, the hunting quota should be adjusted accordingly.
- Hunting and monitoring data should be reported annually and compared with management and conservation goals set out in the Plan.
- Methods used for the hunting of bears should be consistent with the applicable international, national, and regional laws and regulations.

In accordance with the International Union for Conservation of Nature (IUCN) Policy Statement on Sustainable Use of Wild Living Resources (Resolution 2.29, 2000) and the Large Carnivore Initiative for Europe's position statement on the use of hunting, and lethal control, as means of managing large carnivore populations (T-PVS/Inf (2002) 28, Council of Europe, Strasbourg), the IBA asserts that hunting is a form of use of wild and living resources that, when sustainable, can be an important conservation tool. The reasoning is that the social and economic benefits derived from such use provide important incentives for people to protect wildlife habitat and maintain healthy populations. Indeed, all countries in Europe that use derogations of article 16 of the directive to allow limited culling of bear populations by

hunters (Sweden, Finland, Romania, Estonia, Bulgaria, Slovenia and Slovakia) have stable to increasing populations. It is therefore essential to show a certain amount of flexibility in the interpretation of derogation conditions to permit hunting of bears, if above criteria are applied and if local communities are positive to this action.

Conclusion

In light of the above considerations, the IBA urges the EU to give due consideration to member states or countries acceding to the EU that express the wish to apply for a derogation to the application of the “strict protection” criteria under the EU Habitats Directive for the purpose of maintaining or establishing managed bear hunting, provided that a science-based Conservation and Management Plan is in place under which the sustainable hunting program is carried out and that the criteria described above are applied.

Sincerely,



Frank T. van Manen
President



Andreas Zedrosser
Vice-President, Eurasia



Harry Reynolds
Vice-President, Americas