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The European Commission has drafted proposals to update its Guidance document on the strict protection of animal species of Community interest under the Habitats Directive 92/43/EEC. The proposals contain severe restrictions on how EU Member States may apply hunting decisions on the wolf, the lynx and the brown bear. It seems that hunting for large carnivores is threatened by these new restrictive Commission proposals.

As reindeer herders, and as members of the EU Platform on Coexistence between People and Large Carnivores, we are shocked to see this kind of changes prepared without proper hearing of stakeholders. This proposal has not been discussed in the Platform and the Platform members have not been informed about it in any acceptable manner. This seems to be an outrageous and absolutely unacceptable way to push new restrictions to member states via one-sided decision making. The proposal not only disregards our rights to participate and to be heard in such decision-making processes, but also overrides national level practices that have already proven good and effective. Implementing such a policy would be utterly unreasonable.

Large carnivores must not cause excessive harm to the local people or their livelihoods. The number of large carnivore individuals in the reindeer herding area has to be decreased to a level where the damages to the reindeer herding livelihood can be tolerated. The directive should allow the management of large carnivore species on a national level. We need legislation and policies that protect also local livelihoods. In the reindeer herding area this protection is done by allowing hunting within the sustainable limits of local large carnivore populations and permitting derogations of particularly harmful individuals. Only this will secure the ecological, social and economic sustainability of large carnivore coexistence.

The EU Platform on Coexistence between People and Large Carnivores has discussed a lot about the good practices concerning protection of LCs in member states during the ongoing year. In the meetings we have clearly pointed out that we do not see territory-based compensations as a good practice from our point of view. Instead we see particularly this compensation system as a major threat to living reindeer herding practice and culture. The damages caused by wolverine have increased exactly due to territorial compensation system. Still the Commission continues to push this view of territorial payments as an example of a good practice concerning the wolverine, stating that "A very original and successful one is the Swedish initiative Conservation Performance Payments, targeting not wolf but to wolverine. In this initiative payments are linked to the successful reproduction of the wolverine rather than compensating for loss of reindeer. Payments are based on the number of documented wolverine reproductions in the respective district, regardless of predation levels. Growth in the wolverine population was observed 5 years after the programme was set in place. The number of registered reproductions increased from 57 in 2002 to 125 in 2012, with the population expanding into previously unoccupied areas".



Another crucial issue we have raised to discussion in the Platform is so called "ecotourism", which in Finland means offering food to LCs to make them come near people to be photographed. We have repeatedly stated that this kind of tourism only provokes more damages, tampers with the natural behaviour of LCs and breeds a growing number of individual animals that are used to living – and getting their food - in the back- and front-yards of human habitation. Still, the Commission states ecotourism as a good example on innovative financing: "Income generated by eco-tourism may also be a positive tool for improving wolf coexistence, as people living in a particular region are more likely to have a positive view of wolves if they see that they can generate income. For example, the LIFE DINALP Bear project has created a bear-friendly label used to market a range of products. Care has to be taken that tourism does not affect wolf conservation (avoiding disturbance and denning sites). Additionally, the impact on other stakeholder groups should be considered (e.g. not attracting large carnivores to areas)".

Both of these cases used as examples of innovative financing are the exact ones causing most problems and damages to reindeer herding. As a member of the EU Platform of Large Carnivores, we are deeply disappointed and outraged about this outcome done by the Commission. Our concerns have clearly not been heard at all in the Commission eventhough we have actively participated on the work of the EU Platform. This leads us to wonder if there has been any point for us to be a part of this kind of Platform work in the first place.

Strong populations of the large carnivores have direct impacts on reindeer husbandry, as there are no methods to prevent predator damage. The situation is serious and it really threatens the continuation of the livelihood.

According to the preconditions set out in the population management plans, predators must not cause excessive harm to the local people or their livelihoods. The damage caused by predators to reindeer herding is definitely and without doubt this kind of excessive harm. This can only mean that the number of large carnivores has to be declined in the reindeer herding area. This is not possible if the Commission bans practices which have already proven to be good and effective in both protecting the LCs and controlling the amount of damages they cause.

We demand that the Commission takes at least a time out with this planned guiding renewal. If a renewal is still considered necessary, it must be done by respecting also the social, economical and cultural aspects of local life – it must be prepared together with the relevant stakeholders, taking into account the local situations and needs as stated and agreed by the Platform. There must be flexibility in the ways how member states are able to handle their situations and needs in their areas.

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