



15th November 2024

To: (a) Ministry of the Environment of the Slovak Republic (att. Minister of the Environment and Deputy Prime Minister Mr. Tomáš Taraba, tomas.taraba@nrsl.sk);

(b) European Commission Directorate-General for Environment (att. Executive Vice-President Mr. Maroš Šefčovič, cab-sefcovic-contact@ec.europa.eu).

Subject: Bear management in the Slovak Republic

Dear Minister, Dear Commissioners,

We are writing on behalf of the Large Carnivore Initiative for Europe (LCIE)¹ and the International Association for Bear Research and Management (IBA)² to express our concern at recent developments regarding brown bears (*Ursus arctos*) in the Slovak Republic, to call for more evidence-based approaches to decision-making and to offer our assistance in implementing positive changes for the benefit of people and bears.

We are aware of issues relating to increased reports of bear attacks on people in Slovakia, and the presence of bears in or near human settlements, as well as of considerable controversy in connection with subsequent management actions. We understand that different people and interest groups have differing opinions about such incidents, their causes and potential solutions. Bear experts worldwide recognise multiple drivers of bear-related conflicts³. Although most tend to arise from bears being attracted to human-related food sources, there may be other causes, such as when young bears and females with cubs use the vicinity of human settlements as a 'shield' against dominant males or if settlements are located close to natural bear habitats and/or movement corridors. Likewise, there are a range of possible approaches that may help to reduce such conflicts⁴.

The LCIE and IBA acknowledge that lethal control of bears might be justified under certain circumstances. However, decisions on the management of wildlife should be based on sound science and adhere to legally binding obligations. In our opinion, recent bear management policies and actions in Slovakia have not met these criteria. The "Manual for protective shooting of brown bears"⁵, dated 1st March 2024, lacks detailed definitions of problem bear behaviour and adequate protocols for responding to various incidents and scenarios⁶.

¹ The LCIE (www.lcie.org) is a Specialist Group of the IUCN Species Survival Commission.

² The IBA (www.bearbiology.org) is a professional society whose mission is to advance scientific understanding and global conservation of the world's eight bear species.

³ Human-Bear Conflicts Expert Team of the IUCN SSC Bear Specialist Group (2019). Principles of human-bear conflict reduction. https://www.hwctf.org/files/ugd/7acc16_e627e9977374481183ca652d69d67979.pdf.

⁴ Human-Bear Conflicts Expert Team of the IUCN SSC Bear Specialist Group (2019). Approaches to human-bear conflict reduction. https://www.hwctf.org/files/ugd/7acc16_3d73a95720084e8b8c77ce17821664bb.pdf.

⁵ Manuál pre ochranný odstrel medveďa hnedého (2024). Vestník MŽP SR Ročník XXXII Čiastka 1. <https://www.enviroportal.sk/dokument/f/manual-pre-ochranny-odstrel-medveda-hnedeho.pdf>.

⁶ Majić Skrbinšek A, Krofel M et al. (2014). Final report for the pilot action: Defining, preventing and reacting to problem bear behaviour in Europe. Support to the European Commission's policy on large carnivores under the Habitats Directive - Phase 2. Contract nr. 07.0307/2013/654446/SER/B.3.



National legislation⁷ effective from 8th June 2024 appears to allow for bears to be killed rather indiscriminately within zones where an “emergency situation” is declared in connection with the “undesirable occurrence of a brown bear”. We suspect that such vague formulations and relatively untargeted approaches are in breach of the Habitats Directive⁸.

All populations of brown bears in the European Union (EU), including those in Slovakia, are listed in Annex IV of the Directive. Article 12 of the Directive states that:

1. Member States shall take the requisite measures to establish a system of strict protection for the animal species listed in Annex IV (a) in their natural range, prohibiting: (a) all forms of deliberate capture or killing of specimens of these species in the wild.

Article 16 allows Member States to derogate from strict protection provisions for specific limited purposes, including “to prevent serious damage” and “in the interests of public health and public safety”, but specifies that this is only permissible:

1. 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 favourable conservation status in their natural range.

Moreover, in accordance with the precautionary principle, as repeatedly emphasised by the EU Court of Justice, in case of doubt concerning the impact of derogations on population status, or concerning the absence of satisfactory alternatives to killing, a derogation cannot be granted. Therefore, indiscriminate removal of bears from “emergency” zones is only compatible with the Directive if the competent authorities have demonstrated, on the basis of the best evidence available and beyond any reasonable scientific doubt, that this policy is the only available satisfactory way to attain the stated purpose(s). We think these thresholds have not been met. Specifically, we see insufficient investment in non-lethal mitigation measures, lack of safeguards against excessive mortality and little scientific underpinning to decisions, their implementation and assessment of outcomes.

Although we are satisfied that the available evidence indicates the population to be currently at a favourable conservation status as defined by the State Nature Conservancy of the Slovak Republic⁹ (reflected in our recent assessment for the European Commission¹⁰), lack of transparency in decision-making processes, implementation of management actions and reporting of results precludes proper assessment of possible impacts, which may be considerable given an apparently 10-fold increase in removals of bears from the population

https://environment.ec.europa.eu/publications/report-defining-preventing-and-reacting-problem-bear-behaviour-europe_en.

⁷ Act No. 127/2024 Coll. <https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2024/127/>.

⁸ Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701>.

⁹ Kropil R (2005). Medveď hnedý (*Ursus arctos*). In: Polák P, Saxa A, ed. Priaznivý stav biotopov a druhov európskeho významu. ŠOP SR, Banská Bystrica. <https://www.sopsr.sk/natura/index.php?p=9&lang=sk&c=16>.

¹⁰ Kaczensky P et al. (2024). Large carnivore distribution maps and population updates 2017–2022/23. <https://circabc.europa.eu/ui/group/3f466d71-92a7-49eb-9c63-6cb0fadf29dc/library/97829710-878b-4bf7-95a1-f135b00dd8f7/details>.



compared to previous years¹¹. This situation not only has implications for bear conservation in Slovakia and neighbouring states (especially Poland, Hungary and Czechia) but also risks undermining public confidence that problematic situations are being adequately addressed.

The LCIE and IBA regard evidence-based, adaptive approaches as crucial to achieving management and conservation objectives for the benefit of both people and wildlife. We therefore call on the European Commission and Slovak government to:

- Ensure that bear management in Slovakia is in alignment with EU legislation;
- Enable a thorough, independent assessment of recent policies, actions and outcomes in relation to bears and human–bear conflicts.

We also call on the Slovak government to implement relevant actions prescribed by the national bear management plan¹², which was prepared by all key interest groups, funded by the EU and approved by the Ministry of the Environment, in particular to:

- Prioritise use of non-lethal damage prevention measures;
- Increase public knowledge of bears and bear safety;
- Implement adaptive management structures with a scientific underpinning;
- Involve all key interest groups in population monitoring and other activities and support cooperation through inclusive stakeholder processes.

Whilst the specifics of local conditions and affected communities are important and should be taken into account, our organisations have considerable collective experience and knowledge of what has helped to alleviate conflicts elsewhere and therefore may also be beneficial in Slovakia. We are ready and willing to provide assistance in the form of expert consultation with the aim of helping to calm tensions, evaluate conflicts objectively and provide impartial assessment of the most appropriate responses with regard to people's lives and livelihoods as well as to bears as integral components of Slovakia's natural heritage.

We thank you for your attention and await your response.

Yours sincerely,



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¹¹ <https://spravy.pravda.sk/domace/clanok/727511-zasahovych-timov-na-medvede-bude-viac-efektivne-posilnenie-ci-skryta-regulacia-chysta-sa-vytycovanie-buffer-zon/>.

¹² Antal V et al. (2016). Program starostlivosti o medveďa hnedého (*Ursus arctos*) na Slovensku. ŠOP SR, Banská Bystrica. <https://www.minzp.sk/files/sekcia-ochranyprirodyakrajiny/druhova-ochrana-prirody/programy-starostlivosti/ps-medveda-web.zip>.