



JOINT STATEMENT

On

Calls by some NGOs to Introduce a Moratorium on Hunting in Montenegro

The International Council for Game and Wildlife Conservation (CIC) and the European Federation for Hunting and Conservation (FACE) are concerned to learn about efforts by non-governmental organisations (NGOs) to pressure the Government of Montenegro into introducing a moratorium on hunting in the country. Our understanding is that these efforts are being led by a group of more than sixty NGOs, which have **called on the Government of Montenegro to introduce a five-year moratorium on the hunting of game animals.** This follows the killing of a female brown bear (*Ursus arctos arctos*) by poachers in Montenegro on 18 February 2021; it is important to note that this female bear had two cubs.

Hunting is one of the most regulated social activities in Europe, not only through nature and hunting laws but also even more importantly through cultural practices, customs and rules which have been developed over many decades, if not centuries. The main defenders of these rules which go a long way to ensuring the sustainability of hunting are the national federations and their clubs. In some countries, resources for nature protection and enforcement are limited. We consider that having strong national federations such as *Lovački Savez Crne Gore* and through them assigning greater responsibility and accountability to hunters are often key to sustainable hunting and general nature conservation.

Any acts of illegal killing/poaching must be condemned. It is also of utmost importance to make the distinction between what is illegal (poaching) and what is lawful and regulated (hunting). According to the Montenegrin Game and Hunting Laws, the killing of female bears with cubs under the age of two is strictly prohibited. There is no question that these rules, which are designed to ensure that any hunts are conducted ethically and sustainably, have been breached. Therefore, we support an investigation into this case and, should the poachers be found guilty by a court of law, they should be punished according to the relevant laws.

However, it is concerning to hear that some NGOs are trying to pressure the Government of Montenegro into introducing a five-year moratorium on hunting in response to an alleged increase in the poaching of protected species in Montenegro. It is argued that a moratorium should be introduced in order to help establish a system that prevents such illegal activities from taking place. As one solution, it is suggested that game guards and inspection activities should be placed under the jurisdiction of the Ministry of Agriculture and Rural Development.

The NGOs leading this effort also argue that there are flaws in Montenegro's criminal prosecution process regarding illegal killing incidents¹. It was found that out of 127 court cases between 2013 and 2018 involving incidents of illegal animal killing, animal welfare abuses and habitat destruction, 84 cases were dismissed entirely. They suggest that this lack of persecution is what has led to continued incidents of poaching in the country. It should be noted, however, that if there was a decision to propose any reform, this can be achieved without the need for a moratorium on hunting.

In addition, Montenegro's Minister for Agriculture and Rural Development, Aleksandar Stijovic, has stated that he is not in favour of a ban on hunting¹. Instead, he put forward alternative measures that do not require a

mortarium, such as increasing the number of inspectors in the field, monitoring the use of hunting dogs, increasing penalty fees and overall awareness campaigns.

In order to fully ensure that these types of illegal activities do not occur again in the future, it is essential to first and foremost recognise some basic facts. As mentioned above, **'poaching' cannot and should not be equated to 'hunting', which is a legal and regulated activity.** This is the approach taken by the European Commission, the Bern Convention and the Convention on Migratory Species.

The CIC and FACE stress that introducing a moratorium on hunting to allow for the reform of certain parts of the hunting system in Montenegro is disproportionate, unnecessary, and dangerous. Such a measure would have many unintended consequences, and lead to socio-economic and environmental damages and conflicts. While the NGOs in question may not wish to recognise this, we are convinced that any measures should not seek to cause socio-economic and environmental damages but rather to address the issue at stake. Past examples have shown that moratoria/bans on hunting lead to an increase in conflict and illegal killing (poaching), as can be seen in the cases of Albania², Romania³, and Zambia⁴. Often, these types of poaching incidents may occur as a form of retaliatory killing due to problem animals that cannot be removed, or because rural communities are no longer able to benefit from legal, regulated and sustainable hunting activities. Moreover, as shown by several scientific studies, not recognising the needs and interests of local communities gives rise to illegal actions like poaching or poisoning as a form of resistance and protest against governmental decisions^{5,6}.

It is important to consider the full range of benefits that are generated from regulated hunting, and the potential implications that a moratorium would have on wildlife, the local economy and human well-being. From a conservation perspective, hunting can help to regulate wildlife populations, support conservation efforts, and maintain species health, as well as fund anti-poaching initiatives. From a broader perspective, hunting activities play an important role in stimulating rural economies and in preserving land as wild areas, thereby preventing it from being converted for agricultural use or infrastructure development. Many people are also dependent on hunting as an essential part of their livelihoods. This may be because they are employed within the hunting sector, or they may simply hunt as a source of food, to control damages, or for cultural reasons.

Many countries have demonstrated that they can profoundly reform their wildlife management sector without introducing general hunting moratoria and thereby disrupting the sustainable management of wildlife resources.

Enforcement:

We therefore suggest that this issue should be considered as one that relates directly to the monitoring and prosecution of illegal killing (poaching), rather than an issue about hunting itself. In the case of introducing new policies to help reduce the intensity of poaching activities, this can be achieved without introducing a moratorium. As poaching is also one of the biggest threats to sustainable hunting, there is an incentive for hunters themselves to play a bigger role in combatting (e.g. monitoring and reporting) poaching. This would likely reduce the number of poaching incidents, and act as a deterrent for further individuals to engage in the practice.

A moratorium would have far reaching implications that go beyond the issue that needs addressing: poaching. Considering the negative consequences that may arise from the introduction of a general moratorium on hunting, as well as the alternative and more effective means available to reduce poaching, we strongly suggest that such alternatives be considered in this instance.

Looking to introduce new initiatives that make use of existing resources, such as working with hunters or hunting associations, would be a more effective way forward. Such an approach carries less risk than the strategy being proposed by the group of NGOs. Education should also form an integral part of the approach as emphasised by Montenegro's Minister for Agriculture and Rural Development, Aleksandar Stijovic.¹

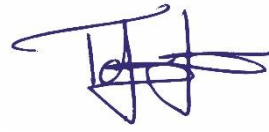
The CIC and FACE are ready to assist the Montenegrin Government and any other relevant authorities in improving regulations relating to hunting in the country, and to offer recommendations on the measures which could be employed to combat poaching effectively.



George Aman

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1. <https://www.vijesti.me/kolumne/514627/zasto-privremena-zabrana-lovaili-mangupi-u-nasim-redovima?fbclid=IwAR23rXqgl-cMi6Da7iCvPWjM8uDsKumT5z880e8-jGRMXINVL82jNsUbPw>
 2. <http://arkiva.ata.gov.al/violation-of-the-hunting-moratorium-in-the-munella-mountains/>
 3. https://wwf.panda.org/wwf_news/?206113/WWF-monitored-Brown-bear-in-Romania-falls-victim-to-poaching
 4. Lewis, D., & Jackson, J. (2005). Safari hunting and conservation on communal land in southern Africa. In R. Woodroffe, S. Thirgood, & A. Rabinowitz (Eds.), *People and Wildlife, Conflict or Co-existence?* (Conservation Biology, pp. 239-251). Cambridge: Cambridge University Press. doi:10.1017/CBO9780511614774.016
 5. Mari Pohja-Mykrä (2016) Felony or act of justice? – Illegal killing of large carnivores as defiance of authorities - <https://www.sciencedirect.com/science/article/abs/pii/S0743016716300031>
 6. Stăncioiu, P. T., Dutcă, I., Bălăcescu, M. C., & Ungurean, Ș. V. (2019). Coexistence with Bears in Romania: A Local Community Perspective. *Sustainability*, 11(24), 7167. <https://www.mdpi.com/2071-1050/11/24/7167>