



Sender:
WSCS Home Office
Schifferstraße 48

D-21629 Neu Wulmstorf
Germany

www.wscs.info

“The Society intends to act as an international forum of scientific discussion for all those interested in pertinent issues on sturgeons, while at the same time seeking for opportunities for close cooperation at an international level”.

Home office:
Schifferstraße 48
D-21629 Neu Wulmstorf
Germany
Tel: xx49-40-700-6514
Fax: xx49-40-70102-676
e-mail: home@wscs.info

Registered at the Court of
Tostedt under the
Reg No VR 1585

Foundation members:
Paolo Bronzi, Italy
Ron Bruch, USA
Jianbo Chang, China
Mikhail Chebanov, Russia
Sergej Doroshov, USA
Jörn Gessner, Germany
Frank Kirschbaum, Germany
Mohammad Pourkazemi, Iran
Harald Rosenthal, Germany
Georgi Ruban, Russia
Rajmund Trzebiatowski, Poland
Patrick Williot, France

To
Ministry of Environment, Water and Forests of Romania
to the attention of
Minister Tanczos Barna

CC to: Agenția Națională pentru Pescuit și Acvacultură (National Agency for Fisheries and Aquaculture)

Neu Wulmstorf, June 1st, 2023

Statement of the Word Sturgeon Conservation Society on the public consultation regarding “”Ordinului pentru aprobarea derogării în scopul cercetării științifice pentru unele specii de pești”

Honourable Minister Tanczos Barna,

The World Sturgeon Conservation Society is an international non-profit organization focusing on the conservation of sturgeons globally and has supported the recovery measures for the Danube sturgeons since it's foundation in 2004. Recently it has come to our attention that the “Oder approving the derogation for scientific research purposes for some fish species” has been published on 26 May 2023 for public consultation. Making use of this opportunity we would like to emphasize our deepest concerns about this order.

WSCS is alarmed by the high numbers of sturgeons included in this derogation order. Considering the conservation status of the sturgeons of the Danube, especially the diadromous species, referring to either the latest reporting on the Habitats Directive, as well as the 2022 IUCN Red List Assessment, the sturgeon populations are in an increasingly unfavourable conservation status, requiring full protection from any adverse impacts. This cautionary approach must also apply to permits for scientific research which if unavoidable should be based upon a clear outline of the reasons for their catch and marking, a justification of the numbers required by outlining the purpose of the experiment and a statistical proof for the minimum numbers required to reach a significant effect. Further, this application must clearly relate the number of fish applied for to the wild population size to fully understand the potential for adverse effects (in case of fish caught during migration the migrating population segment must be referred to). None of the above conditions have been met by the derogation order. Since no population estimates are available for the populations of the migratory sturgeons, the permit must not be issued.

We clearly see the above mentioned order as a threat to the natural population of all 3 migratory species of sturgeons, It has been evident from the evidence provided on the results of the telemetry studies in the Danube in the past that their catch and handling in the past that the majority of the individuals have ceased to continue their migration, therefore they, have refrained from reproduction but have migrated back to sea. Mainly these outcomes are related to poor handling practice and elevated stress as is depicted in a video made available online which was made reference to in concerns expressed to your Ministry in March last year by the DSTF and the WSCS already.



Since similar results are to be expected in the work which is covered under this derogation, the planned number of fish to be used is most likely to massively affect the natural recruitment of fish in the Danube for the 4 years of the derogation order but which will result in major effects (i.e. reduced population sizes) to be expected for the time the offspring of these year classes would become mature.

Furthermore, such a severe impact to the populations in questions is not justifiable since in the past already the results are not communicated effectively and shared with the scientific community. As observed in the past, none of the experimental approaches of the applicant have met international standards. As such, a clear and open research plan must be provided to justify the derogation.

WSCS sees absolutely no reason for granting catch derogations for such high numbers of critically endangered species, and asks for a drastic reduction in numbers per specimen, for which the need needs to be documented on a scientific basis and in line with the research question.

Methods, sampling gear and treatment must always and foremost consider animal welfare and operate under precautionary principles, especially when dealing with critically endangered species. WSCS has raised concerns to your Ministry in April 2022 about the handling practices by INCDPM as shown on publicly available pictures and video material. WSCS therefore requests that the description of an improved and approved best practice handling and methodology must be part of any derogation order also to provide the basis for relevant control of authorities to ensure that inappropriate handling is avoided. Furthermore, the results of the previous works showed massively skewed population structure of the species in question. Again, the question remains how the derogation can leave the concerns related to a massively altered population structure out of consideration?

Sturgeon in the Lower Danube must be considered a shared resource between the range countries, the catch of adult sturgeon in such high numbers in Romania must be addressed by the involvement of the range states (Serbia, Bulgaria, Ukraine) to gather their consent with regard to the conservation targets and should be coordinated with other projects on sturgeon conservation in the Danube River Basin.

No scientific experimentation should increase the threat to the population. As such the dimension of the derogation is considered infeasible when the welfare of the populations is at stake.

WSCS herewith asks the Ministry to consider the above mentioned serious concerns and based on these considerations revise the derogation order, limiting the numbers, providing a clear rationale for the use of the number of specimen requested, describing the purpose and the methods to be applied and making the full report on the experimental outcome public.

Hoping to see the above listed massive concerns reflected in the revised derogation order we herewith remain.

Sincerely


The Board of Directors