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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

38th meeting
Strasbourg, 27-30 November 2018

Complaints on stand-by

**Presumed deliberate killing of birds
&
Alleged deliberate killing of birds of prey
in Serbia**

- REPORT BY THE COMPLAINANTS -

*Document prepared by
EPAR -OIPA Serbia / Alliance for Nature Protection, the rights of animals and people
and BirdLife Serbia, Serbia*

- 13 FEBRUARY 2018 -**Third Updated report on
Complaint No. 2014/3 - Complaint No. 2016/3 - Alleged deliberate killing of birds of prey,
regarding cases of poisoning of wild animals by pesticides in Serbia****1. New facts**

The reason for additional supplementing of Complaint No. 2014/3 and our Complaint No. 2016/3, which we have forwarded to the Secretariat of the Bern Convention, are new cases of poisoning by pesticides of species of animals which are on the Appendix II of the Bern Convention. There is no proof that reported cases have been legally processed according to the legislation of the Republic of Serbia, as this has not been done also in previous cases, for which the Secretariat of the Bern Convention already received the complaint from the Bird Protection and Study Society of Serbia in 2014 and from EPAR-OIPA Serbia in 2016, with Update 06th July 2016. and Update 27th February 2017. The only two exemptions are cases of Crane (*Grus grus*) poisoning near by Novi Kneževac, in 2014 and 2016.

The case of poisoned Cranes in 2016 was solved with minimum fine and the case from 2014 when 19 Cranes were poisoned, although with evidence and proven, has not been yet solved.

Third Amendment will continue with events after we have ended the second complaint, case of large scale poisoning on 18. February 2017 in area of Osipaonica near Smederevo, when 14 individuals of

Common Buzzard (*Buteo buteo*), 1 Jackdaw (*Corvus monedula*), 4 Jackals (*Canis aureus*). On two corpses of domestic sheep remains of substance responsible for poisoning was detected. In the meantime we received more information of poisoning during this period which we further describe.

As a result of this, almost no person was yet lawfully sentenced for the stated criminal acts.

The following bird species listed in the Appendix II of Bern Convention (Strictly protected fauna species) are subjects of this addition to cited complaint : Imperial Eagle (*Aquila heliaca*), Peregrine (*Falco peregrinus*), Red Kite (*Milvus milvus*), White-tailed Eagle (*Haliaeetus albicilla*), Common Buzzard (*Buteo buteo*) and Long-eared Owl (*Asio otus*).

The total number of poisoned and dead individuals of these strictly protected birds, the subject of this report, found in Serbia between February 2017 and February 2018 is 27:

- 1 individuals of Imperial Eagle (*Aquila heliaca*)
- 1 individuals of Peregrine (*Falco peregrinus*)
- 1 individuals of Red Kite (*Milvus milvus*)
- 5 individuals of White-tailed Eagle (*Haliaeetus albicilla*)
- 13 individuals of Buzzard (*Buteo buteo*)
- 6 individuals of Long-eared Owl (*Asio otus*)
- 1 individuals of Otter (*Lutra lutra*)

We add the case of the purposely killed Otter (*Lutra lutra*) with hunting rifle by hunters from Hunting Association "Fazan" Preševo, on 17 February 2015. Although we did all we could to find the guilty and be punished according to criminal law, nothing happened. The same is the case with the Griffon vulture (*Gyps fulvus*) no punishment executed while the Public Prosecutor from Prijepolje rejects to send information on what it has done in the last two years.

In Serbia in the past several years, more than 80 White-tailed Eagles were poisoned (about a third of the population) and the village Svilojevo near Apatin is the black spot where most of the eagles fell as victims.

All dead individuals of White-tailed Eagle were found on agricultural land, or close to alluvial regions along the Danube and Sava Rivers. All other mentioned individuals were found on agricultural land and beside most of them bait was found - domestic or wild animal, whose parts are consumed by poisoned individuals. There are clear indications that the number of poisoned strictly protected birds within this period was much higher, but exact number remained unknown due to many errors and inconsistencies in the procedures of relevant government authorities.

All individuals (total of 27) were found in the territory of the autonomous province of Vojvodina.

If cases of poisoning of the listed birds are not followed by continuous administrative and legal procedures, which would in a preventive manner deter a use of pesticides that is causing these poisonings, and with court procedures resulting in lawful sentences and punishing of persons responsible for such criminal acts, including compensation for the poisoned individuals, poisoning is promoted as an effective mean for controlling (illegally) unwanted wild animals, identical to cases mentioned in two previous complaints. For example, the absence of punishment of those responsible for this, sends a very negative message that criminal acts are worthwhile and that the government officials are not capable or do not wish to solve the problem.

Additional aggravating circumstances for the Regional inspection where the largest cases of poisoning took place is the fact that after sending the e-mail, sent from the official address of Ljiljana Jovanović dated 30th of August 2016, has informed the Regional Secretariat for Urbanism and Environmental Protection in Novi Sad, Institute for Nature Protection in Novi Sad and Belgrade as well as the Scientific Veterinary Institute in Novi Sad, that further analysis in order to determine the reason of the death of strictly protected species which were performed in the Scientific Veterinary Institute, Novi Sad, are to be terminated until further, with the explanation that financial means projected for the year 2016 have been used.

After this, during numerous poisonings in the area of village Vitojevci, Municipality of Ruma,

Inspector for Environmental Protection Nataša Ružić, in her field report No. 140-501-1298/2017-06 of 21.12.2017. on page 3. notes that; "the found dead individuals will be placed in the freezer of the Regional Institute For Nature Protection in accordance to the letter from the Ministry dated 30.08.2016, by which all analysis is terminated in order to determine the reason of death of the strictly protected species of wild animals", ie. just because of our letter mentioned in the previous Amendment of complaint to SBC and for which we several times approached the Ministry asking for an answer, the answer never arriving.

So, almost after a year and a half, Inspector Nataša Ružić was not informed if the Ministry secured finances for the autopsy and toxicology analysis..

This clearly demonstrates the lack of coordination and collaboration between the relevant authorities at the Regional and Republic levels.

2. Carbofuran

Undoubtedly substances containing carbofuran as the active ingredient, although they are forbidden to use and for sale in the Republic of Serbia since the year 2014 are still used and sold. Due to its high effectiveness and easy accessibility, carbofuran is frequently applied, especially in agricultural areas, and especially during the spring period of intensive agricultural activities in Serbia (March-May). Because of its quick reaction in animal organism, it is also very often used (illegally) for reducing the population of foxes (*Vulpes vulpes*), jackals (*Canis aureus*) but also for poisoning stray dogs and cats. In the vicinity of corpses of these two mammals, also corpses of the mentioned poisoned birds have often been found. It is evident that the authorities of the Republic of Serbia have not exerted any effort to prevent traffic and use of carbofuran.

Such a situation threatens with further cases of poisoning of strictly protected animals in a very short period of time as Government authorities behave very irresponsible and totally indifferent towards this problem. Numerous flaws in procedures exist concerning Government authorities during the discovery of animal corpses for which poisoning is suspected. Main flaws are:

1. In case of having been informed, the police and public prosecutors act reluctantly and carelessly, do not recognize their authorities for illegally killed by poisoning, strictly protected animal species.

2. A very slow analysis of samples of dead, strictly protected animals and submission of data on this to the inspection and court authorities which were previously a problem, remained so and continued for new cases of poisoning.
3. The absence of refunding the costs of analysis of new samples of dead, strictly protected animals by the Ministry of Environmental Protection which is their lawful obligation (according to the Article 93 of the Nature Conservation Act).
4. Ministry of Environmental Protection additionally worsened the situation as with its notification of 30th August 2016 completely terminated financing the analysis of corpses, thus suspending Article 93 of the Nature Conservation Act.
5. Impossibility of paying the costs of the analysis of samples of dead animal species which are not strictly protected in the Republic of Serbia, domestic animals and other animal food which is often the cause of poisoning (not predicted in Article 93 of the cited Law on Nature Protection).
6. In controlling the black market for banned pesticides, there is no cooperation between the respective offices from the Ministry of Environmental Protection, Ministry of Agriculture, Forestry and Water Management and Ministry of Commerce and their inspections, Police and Public Prosecutors, so that anyone who wishes, may buy the pesticide Furadan 35 ST or other products which contain the same active substance Carbofuran, ie. this poison. We kindly ask the Secretariat of the Bern Convention to request the Ministry of Environmental Protection (Focal point) to show concrete steps which have been undertaken so that the cooperation between all Ministries and Prosecutors is established in order to neutralize the market for this preparation.

It is impossible under these conditions to work on solutions to this problem, the problem persisting with no further achievement result for 18 months, since our updated to Complaint from 2016 and 2017, not to mention complaint No 2014/3.

7. We also kindly ask the Secretariat of Bern Convention to ask the Ministry of Environmental Protection for the famous Protocol on the cooperation between the Ministry of Environmental Protection, Ministry of Internal Affairs, Ministry of Justice and Republican Public Prosecutor, about which they boasted so much, and has it been brought so that this Ministry proves with examples how this Protocol is implemented and has been shown to be efficient. In case the Protocol of the Ministry is in power, the Secretariat of the Bern Convention may ask the Ministry of Environmental Protection to request from the other two Ministries to give their opinion on the conducting of the Protocol.
8. We kindly beg the Secretariat of the Bern Convention to ask the Ministry of Environmental Protection, when and how do they plan to increase the efficiency and speed of analyses of corpses, since this is the only way to find the guilty executer.

For points 7 and 8 we tried to get the answer but without success. We also contacted on the 26th of February 2016 the Republic Public Prosecutor Ms. Zagorka Dolovac but to day she did'n do nothing. After a whole two years, we received no adequate answer.

As you may also notice, we repeat the same problems, insufficient control of pesticide distribution, illegal sale of forbidden substances (carbofuran substance), unlawful methods of killing Foxes and Jackals, but also dogs and cats and the inadequate reaction of relevant governmental authorities which continues into 2018.

It is disheartening since the criminal files are discharged against suspects, even when they are identified.

We will mention the last such case we had in 2016 when Mr Čanadi Deže in area of Novi Kneževac poisoned 5 Crane (*Grus grus*). The Regional Inspection filed a criminal charge against him for killing strictly protected bird species as well as the Phytosanitary Inspection for violating the Law on substances used in plant protection. The Public Prosecutor in Kikinda rejected this criminal file bringing only the measure of opportunity of the basis of the Criminal Procedure Law, only partially taking into account the request of the Regional Institute for Nature Protection, so the accused only paid as compensation for the killed Cranes only 400.000 Dinars instead of 1.000.000 Dinars. (less than half the amount requested). In this way, he paid for only two Cranes instead of the five he killed. He did not pay the penalty.

We wish to mention that the regional Inspection improved its work and acted as best as possible in the described cases of poisoning, the same may be said of the regional Institute for Nature Protection, but without the assistance of the Ministry which should always secure means and finances for autopsies and toxicological analysis, this still being a problem. Without the assistance of Police and Public Prosecutors, it is not possible to solve this years long problem.

Information of public significance for this subject is very difficult to obtain.

It is also necessary to commend the Bird Protection and Study Society of Serba which does everything possible in the case of willful bird poisoning and killing, also informing the public about this.

<http://balkans.aljazeera.net/video/srbija-zivotinje-jos-uvijek-umiru-zbog-karbofurana>

Unfortunately, we are sending with the list, dissightly photos from Serbia, poisoned wild animals.

We add the case of the purposely killed Otter (*Lutra lutra*) killed by identified hunters but the executer was not punished and we still can not get information from the Prosecutor in Vranje as we did not get anything related to the killed Griffon vulture from Prosecutor in Prijepolje. This means the Prosecutors do not act according to the Criminal Law and do not process the cases according to relevant Laws..

The listed flaws contribute to the absence of sentencing of acts of poisoning, encouraging the atmosphere in which such acts may be repeated indefinitely without any punishment.

**ANNEX I OF ADDITION OF COMPLAINT TO BERN CONVENTION SECRETARIAT BY EPAR-OIPA
SERBIA ON 13TH FEBRUARY 2018.**

Table 1. List of new reported cases of poisoning of birds from App. II of Bern Convention between February 2017 and February 2018

Date	Location (settlement, site)	Number of poisoned individuals	Species – carcasses/animal traces found	Source of information
17 February 2015	Around village Rajince (Municipality of Preševo)	1	<i>Lutra lutra</i>	Doka Marinković from Vranje
18 November 2016	Around Grabovci (Municipality of Sremska Mitrovica)	1	<i>Haliaeetus albicilla</i> (individual found live but died during the day)	Provincial Institution for Nature Protection
05 October 2016	Nova Pazova	6	<i>Asio otus</i>	Provincial Institution for Nature Protection (one corpse was not found)
03 June 2017	Center of Novi Sad	1	<i>Falco peregrinus</i>	Provincial Institution for Nature Protection
02 November 2017	Around village Ratiševo (Municipality of Vršac)	1	<i>Milvus milvus</i>	Provincial Institution for Nature Protection
18 December 2017	Around village Bačka Topola	1	<i>Buteo buteo</i> Nearby was found the corpse of domestic geese, a visible potent material suspected of being poison-carbofuran	Provincial Institution for Nature Protection
21 December 2017	Around Vitojevci (Municipality of Ruma)	2 4 4 1 1 6 4	<i>Haliaeetus albicilla</i> <i>Buteo buteo</i> <i>Corvus corax</i> (not Bern Appendix II species) <i>Corvus corone corax</i> (not Bern Appendix II species) <i>Martes foina</i> <i>Vulpes vulpes</i> (not Bern Appendix II species) <i>Canis aureus</i> (not Bern Appendix II species)	Provincial Environmental Inspection Report No. 140-501-1298/2017 Reason for poisoning were samples of guts with traces suspecting carbofuran. Location of poisoning in vicinity of center of Village Vitojevci towards forest Karakuša where active nests of <i>Haliaeetus albicilla</i> are present.
04 January 2018	Around village Žitište (On the fishpond)	2 1 1	<i>Buteo buteo</i> <i>Pica pica</i> <i>Vulpes vulpes</i> (not Bern Appendix II species)	http://www.021.rs/story/Info/Vojvodina/179443/Zitiste-Novo-velikotrovanje-zivotinja-medju-njima-izasticene-vrste.html
08 January 2018	Around village Svilojevo	1	<i>Aquila heliaca</i>	Provincial Environmental Inspection

	(Municipality of Apatin)	2 5 2 7 1 1	<i>Haliaeetus albicilla</i> <i>Buteo buteo</i> <i>Pica pica</i> <i>Canis aureus</i> (not Bern Appendix II species) <i>Vulpes vulpes</i> (not Bern Appendix II species) dog The remains of domestic animals were found at 6 sites (sheeps and cows)-with clear remnants of pesticide, source of poisoning	Report No.140-501-74/2018-06 the coordinates: 45.38 57 70, 19.02 09 00 https://www.blic.rs/vesti/drustvo/orao-krstas-zalutao-je-iz-austrije-u-srbiju-a-ono-sto-mu-se-desilo-u-nasoj-zemlji-ce/fj4q7e0
27.January 2018	Around village Banatsko Višnjićevo (Municipality of Žitište)	1	<i>Buteo buteo</i>	http://www.rts.rs/page/stories/ci/story/56/srbija-danas/3016264/trovanje-orlova-u-banatu.html

Available photos :

1. Otter (*Lutra lutra*) killed by a hunting rifle 17th february 2015





2. Poisoning in Svilojevo (Imperial Eagle with a satellite transmitter from Austria)





3. Poisoning in Žitište



4. Poisoning in Vitojevci



5. Posoning in Nova Pazova



6. Other photos





Sincerely,

EPAR -OIPA Serbia / Alliance for Nature Protection, the rights of animals and people

24000 Subotica Matka Vukovića 9

President : MD Slavica Mazak Bešlić

epar@mts.rs;

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Save the nature!

Document prepared by

EPAR-OIPA-Serbia / Alliance for Nature Protection, the rights of animals and people

- 12 FEBRUARY 2018 -

We are sending you an updated report on illegal bird poisoning in Serbia for the period 1 January 2017 until 11 February 2018. The situation in Serbia is getting worse and we see no real improvement in the field. The latest several months were the worst ever in terms of both, cases reported and birds poisoned. We are witnessing a clear lack of proper reacting, especially from the police, prosecutors and judges offices, which resulted in zero criminal charges against known offenders and therefore no punishment.

We are also sending you an official translation of a open letter from Mr. Dragan Šormaz, a highly positioned politician of a ruling party in Serbia and the President of the Hunting Association of Serbia. This letter is sent to the Police Commissioner, Vladimir Rebić. We see this letter as a clear evidence of strong political pressure to stop field investigation of illegal bird killing in Serbia.

Please also have a look at our "Report on illegal shooting, poisoning, trapping, possessing and trade of wild birds in the Republic of Serbia for the period 2000-2017" on the link below: <http://pticesrbije.rs/wp-content/uploads/2017/10/Serbia-bird-crime-report.pdf>

Please do not hesitate to ask us for more data. Our data base has all the bird crime cases stored.

Best regards,

Milan Ružić
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C E R T I F I E D T R A N S L A T I O N

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[Seal of the Hunting Association of Serbia, Belgrade, Republic of Serbia]

Mr. Vladimir Rebić, Police Commissioner,
Ministry of Internal Affairs
Police Administration

SUBJECT: Reviewing procedures approving police support to so-called animal protectors

Dear Commissioner,

In search of an answer to the question, who provides police support to false animal protectors, we felt that it was necessary to contact you directly.

The reason for this, among other things, are the latest headings published in print and electronic media in which, on the one hand, featuring untrue allegations to the detriment of hunters, and on the other hand, glorify so-called activists for the protection and study of birds, animal rights and other association from the "green" range.

Ever more frequent are attacks on hunters for using electronic calling devices for hunting quail in flight without the differentiation being made between, on the one hand, hunters who responsibly and conscientiously perform their activities in accordance with the Law on Wild Animals and Hunting, and on the other hand, persons illegally hunting, like poachers. Regardless of whether this is due to ignorance or intent, damage has been done to hunters and the hunting organization.

We emphasize that the Hunting Association of Serbia, since its inception and up until the present, has been advocating the prevention of all forms of illegal hunting, as well as amendments to regulations asking for more severe sanctions to perpetrators, with the application of new compensatory prices, higher fees for illegally hunting game.

We ask you to also keep in mind the following. The use of electronic calling devices does not necessarily need to be used for hunting, it can also be used for monitoring game movements over hunting ground, as hunters do not only hunt they also preserve and cultivate



game, which fact is supported by the large number of pheasants that inhabit most of the hunting grounds.

Under the Law on Wild Animals and Hunting (“Official Gazette of the Republic of Serbia” No. 18/10), and Article 90, Paragraph 2 of the Law, the Minister of Agriculture, Trade, Forestry and Water Management adopted the Rulebook on Safety Measures in Hunting Areas (published in the “Official Gazette of the Republic of Serbia” No. 76/11).

In accordance with this Rulebook, organizations which oversee hunting areas are required to comply with rules on hunting safety. Thus, Article 2, Paragraph 1, Indent 10 of the Rulebook states, “... prescribed measures for the protection and safety of life, health, property of not only hunters, but also legal entities and *natural persons who are within the hunting area but not engaged in the hunting itself*, during the organization of hunting, especially when hunting is organized in a way that provides for the use of hunting dogs and the organization of individual hunting of wild boars and big beasts (wolves, jackals and foxes) at night, one hour before going out and one hour after sunset, waiting at hunting stands”.

Article 3 of the same Rulebook stipulates that, “...legal entities and natural persons, including users or protected nature area managers, who carry out agricultural works, forestry and other activities(!) on the surface of the hunting grounds, are obliged to inform the user, in a timely manner, about these works.”

Accordingly, hunting organizations are recognized by law as responsible, without exception, for the safety of those who find themselves within the hunting grounds.

As lately, primarily the media, has been reporting of an increasing presence of unknown persons in hunting areas, the question is posed as to who is responsible for their safety, and who has coordinated regular activities of hunting organizations with the movement of these people on the ground?

How are we to take measures for the protection and safety of life, health and property of not only hunters, but also legal entities and natural persons who are on the hunting ground - which is our legal obligation, if we have not been informed of their presence, in a timely manner, nor do we have any information on the same?



When there is suspicion of illegal actions that are contrary to provisions of the Law on Wild Animals and Hunting, in case of using police assistance or hunting inspections, it is common practice to, before going out in the field, first notify the organization overseeing the hunting ground.

Thus far, this has been the case with hunting inspections, when reacting to occurrences on hunting grounds or when conducting an inspection of hunting organizations overseeing hunting grounds.

Therefore, we ask the Ministry of Internal Affairs to, in the future, **inform the user of the hunting ground in advance** about the movement of persons over the hunting grounds, when someone asks for police assistance, in order to preserve the safety of all persons moving within a hunting area or participating in planned activities that take place over the same.

In the hope that you will correctly interpret this response, we greet you with a hunter's greetings "Clear View".

President of the Hunting Association of Serbia


Dragan Sormaz m.p.


I hereby certify that this translation is in full conformity with the original in the Serbian language.

Reg. No.: 050-02/18

In Novi Sad, on February 06, 2018

**COURT TRANSLATOR FOR
THE ENGLISH LANGUAGE**
Appointed by the Decision of the Provincial Secretariat
for Regulations, Administration and National Minorities
No. 181-74-001/18-00121 of December 15, 2007


(Mr. Igor Ivkov)





1896
2017

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LSS član CIC



LSS član FACE

Broj/Number:

31.8.2017. god.

**gđin Vladimir Rebić, direktor policije
Ministarstvo unutrašnjih poslova
Uprava policije**

**PREDMET: Razmatranje procedura kojima se odobrava policijska
podrška takozvanim zaštitnicima životinja**

Poštovani direktore policije,

U potrazi za odgovorom na pitanje, ko pruža policijsku podršku lažnim zaštitnicima životinja, smatrali smo da je potrebno da Vam se direktno obratimo.

Povod su, između ostalog, poslednji natpisi objavljeni u štampanim i elektronskim medijima, u kojima se sa jedne strane ističu neistiniti navodi na štetu lovaca, a sa druge strane se glorifikuju aktivisti takozvanih društava za zaštitu i proučavanje ptica, zaštitu prava životinja i drugih društava iz palete „zelenih“.

Sve češći su napadi na lovce zbog korišćenja elektronskih vabilica u lovu prepelica tokom leta, a da se pri tome ne pravi razlika, opet sa jedne strane, između lovaca - koji odgovorno i svesno obavljaju svoje aktivnosti u skladu sa Zakonom o divljači i lovstvu, i na drugoj strani lica koja ilegalno love, kao krivolovci i lovokradice. Da li je po sredi neznanje ili namera, svejedno, šteta je učinjena lovcima i celokupnoj lovačkoj organizaciji.

Naglašavamo da se Lovački savez Srbije, od svog osnivanja do danas, zalaže za sprečavanje svih vidova ilegalnog lova, kao i za izmenu propisa kojima se

počinioi ilegalnog lova moraju drastičnije kažnjavati, uz primenu novih odštetnih cenovnika, sa višim naknadama za ilegalno odstreljenu divljač.

Treba imati u vidu i sledeće. Korišćenje elektronskih vabilica ne mora služiti samo za lov, već i za praćenje - monitoring kretanja divljači u lovištu, jer se lovci ne bave samo lovom, već i čuvanjem i gajenjem divljači, o čemu najočiglednije svedoči veliki broj unete fazanske divljači u većini lovišta.

Po Zakonu o divljači i lovstvu (Sl. gl. RS br. 18/10), a na osnovu čl. 90 stav 2. Zakona, Ministar poljoprivrede, trgovine, šumarstva i vodoprivrede je doneo Pravilnik o merama bezbednosi u lovištu (objavljen u Sl. gl. RS broj 76/11).

U skladu sa ovim Pravilnikom organizacije koje gazduju lovištima su dužne da se pridržavaju pravila o bezbednosi u lovištima. Tako je, u čl. 2 stav 1. alineja 10. istog Pravilnika, „...propisano preduzimanje mera za zaštitu i bezbednost života, zdravlja, imovine ne samo učesnika u lovu, već i pravnih i fizičkih lica koja se nalaze u lovištu, a ne učestvuju u lovu, prilikom organizovanja lova, a naročito prilikom organizovanja lova na način koji predviđa upotrebu lovačkih pasa i organizovanja pojedinačnog lova na divlje svinje i krupne zveri (vuka, šakala i lisicu) noću, jedan sat pre izlaska i jedan sat posle zalaska sunca, dočekom sa čeke“.

U članu 3. istog Pravilnika piše i da su „...pravna i fizička lica, uključujući i korisnika odnosno upravljača zaštićenih prirodnih dobara, koja na površini lovišta obavljaju radove u poljoprivredi, šumarstvu i drugim delatnostima (!), dužna da blagovremeno obaveštavaju korisnika o tim radovima“.

Prema tome, lovačke organizacije su zakonom prepoznate kao odgovorne, bez izuzetka, za bezbednost lica koja se zateknu na terenu lovišta kojim gazduju.

Kako u poslednje vreme, najpre mediji, beleže sve veće prisustvo nepoznatih lica u lovištima, postavlja se pitanje ko je odgovoran za njihovu bezbednost, i ko je uskladio redovne aktivnosti u lovačkoj organizaciji sa kretanjem ovih lica na terenu?

Kako da preduzimamo mera za zaštitu i bezbednost života, zdravlja i imovine ne samo učesnika u lovu, već i pravnih i fizičkih lica koja se nalaze u lovištu - što nam je zakonska obaveza, ako o tome nismo blagovremeno obavešteni, niti imamo informaciju o njihovom prisustvu u lovištu?

Kada postoji sumnja u nezakonite radnje, koje su suprotne odredbama Zakona o divljači i lovstvu, u slučaju korišćenja asistencije policije ili lovne

inspekcije, takođe je praksa da se o tome prvo obavesti organizacija koja gazduje lovištem, pa tek onda se izađe na teren.

To je do sada uostalom i bio uvek slučaj kod lovne inspekcije, prilikom reagovanja u lovištima ili pri vršenju inspeksijskog nadzora u organizacijama koje gazduju lovištima.

Stoga zahtevamo od MUP-a da ubuduće, kada neko traži asistenciju policije, **obavezno pravovremeno obaveste korisnika lovišta** o najavljenom kretanju lica po lovištu, kako bi bila sačuvana bezbednosti svih lica koja se kreću u lovištu ili učestvuju u planiranim aktivnostima koje se odvijaju u lovištu.

Nadajući se da ćete ispravno shvatiti ovo naše reagovanje, pozdravljamo Vas lovačkim pozdravom „Dobar pogled“.

Predsednik lovačkog saveza Srbije

Dragan Šormaz s.r.

Annex 1. Reported wild bird poisoning cases in Serbia during 2017 and 2018

No.	Date m/d/y	Site (locality, municipality)	Bird species	Number of poisoned individuals	Source
1	1/3/2017	Kupinovo, Pećinci	<i>Haliaeetus albicilla</i>	1	INCV
2	1/23/2017	Negotin, Negotin	<i>Columba livia</i>	10	http://eastside.rs/index.php/hronika/3920-masovno-trovanje-golubova-u-ulici-srbe-jovanovica
3	2/18/2017	Osipaonica, Smederevo	<i>Buteo buteo</i>	14	BPSSS http://www.novosti.rs/vesti/srbija.73.html:651004-Drustvo-za-zastitu-ptica-U-blizini-Osipaonice-otrovano-14-misara
4	2/18/2017	Osipaonica, Smederevo	<i>Corvus monedula</i>	1	BPSSS http://www.novosti.rs/vesti/srbija.73.html:651004-Drustvo-za-zastitu-ptica-U-blizini-Osipaonice-otrovano-14-misara
5	4/9/2017	Sisevac, Paraćin	<i>Buteo buteo</i>	1	Police department in Jagodina, BPSSS
6	4/15/2017	Vršac, Vršac	<i>Corvus frugilegus</i>	2	BPSSS, Milivoj Vučanović
7	4/15/2017	Vranovo, Smederevo	<i>Haliaeetus albicilla</i>	1	BPSSS
8	4/27/2017	Rimski Šančevi, Temerin	<i>Streptopeli a turtur</i>	2	BPSSS, Arpad Šarok
9	4/27/2017	Rimski Šančevi, Temerin	<i>Phasianus colchicus</i>	?	BPSSS, Arpad Šarok
10	5/15/2017	Malo Središte, Vršac	<i>Corvus corax</i>	1	BPSSS, Milivoj Vučanović
11	5/15/2017	Veliko Središte, Vršac	<i>Strix aluco</i>	1	BPSSS, Milivoj Vučanović
12	6/3/2017	Grbavica, Novi Sad	<i>Falco peregrinus</i>	1	BPSSS http://www.rtv.rs/sr_lat/drustvo/sivi-soko-otrovan-furadanom_832673.html
13	7/5/2017	Novi Sad, Novi Sad	<i>Columba livia</i>	?	BPSSS
14	8/7/2017	Progar, Surčin	<i>Ciconia ciconia</i>	4	BPSSS
15	9/21/2017	Ritiševo, Vršac	<i>Milvus milvus</i>	1	BPSSS
16	10/1/2017	Paraćin, Paraćin	<i>Buteo buteo</i>	2	BPSSS
17	10/21/2017	Valjevo, Valjevo	<i>Corvus corax</i>	20	BPSSS http://www.novosti.rs/vesti/srbija.73.html:691781-Pomor-ptica-kod-Valjeva-20-uginulih-gavranova
18	11/3/2017	Doroslovo, Sombor	<i>Haliaeetus albicilla</i>	1	INCV
19	12/21/2017	Vitojevci, Ruma	<i>Buteo buteo</i>	4	BPSSS http://rs.n1info.com/a351285/Vesti/Vesti/Najvece-trovanje-divljih-zivotinja-ove-godine-u-Vitojevcima.html

20	12/21/2017	Vitojevci, Ruma	<i>Haliaeetus albicilla</i>	2	BPSSS http://rs.n1info.com/a351285/Vesti/Vesti/Najvece-trovanje-divljih-zivotinja-ove-godine-u-Vitojevcima.html
21	12/21/2017	Vitojevci, Ruma	<i>Corvus corax</i>	3	BPSSS http://rs.n1info.com/a351285/Vesti/Vesti/Najvece-trovanje-divljih-zivotinja-ove-godine-u-Vitojevcima.html
22	12/23/2017	Bačko Gradište, Bečej	/	Carbofuran baits	BPSSS https://www.b92.net/info/vesti/index.php?yyyy=2017&mm=12&dd=26&nav_category=12&nav_id=1340564
23	12/28/2017	Svilojevo, Apatin	<i>Haliaeetus albicilla</i>	1	Milan Rajić, PE VojvodinaŠume
24	12/29/2017	Zemun, Zemun	<i>Columba palumbus</i>	25	BPSSS
25	12/29/2017	Zemun, Zemun	<i>Pica pica</i>	1	BPSSS
26	1/4/2018	Žitište, Žitište	<i>Buteo buteo</i>	2	BPSSS http://www.021.rs/story/Info/Vojvodina/179443/Zitiste-Novo-veliko-trovanje-zivotinja-medju-njima-i-zasticene-vrste.html
27	1/4/2018	Žitište, Žitište	<i>Pica pica</i>	1	BPSSS http://www.021.rs/story/Info/Vojvodina/179443/Zitiste-Novo-veliko-trovanje-zivotinja-medju-njima-i-zasticene-vrste.html
28	1/4/2018	Sremska Mitrovica, Sremska Mitrovica	/	Carbofuran baits	BPSSS http://rtv.rs/sr_lat/vojvodina/srem/otrov-za-zivotinje-u-legetskoj-sumi_883096.html
29	1/8/2018	Svilojevo, Apatin	<i>Aquila heliaca</i>	1	BPSSS http://www.kurir.rs/vesti/srbija/2973179/uznemirujuci-foto-tuzan-prizor-kod-apatina-otrovana-mlada-zenka-orla-krstasepski-put-od-4200-km-kroz-8-drzava-tragicno-zavrila-nanasoj-njivi
30	1/11/2018	Svilojevo, Apatin	<i>Buteo buteo</i>	5	BPSSS http://www.021.rs/story/Info/Vojvodina/179945/Staro-mesto-isti-zlocin-novo-trovanje-zivotinja-kod-Apatina.html
31	1/11/2018	Svilojevo, Apatin	<i>Pica pica</i>	2	BPSSS http://www.021.rs/story/Info/Vojvodina/179945/Staro-mesto-isti-zlocin-novo-trovanje-zivotinja-kod-Apatina.html
32	1/14/2018	Svilojevo, Apatin	<i>Haliaeetus albicilla</i>	2	BPSSS http://www.021.rs/story/Info/Vojvodina/179945/Staro-mesto-isti-zlocin-novo-trovanje-zivotinja-kod-Apatina.html
33	1/14/2018	Svilojevo, Apatin	<i>Buteo buteo</i>	1	BPSSS http://www.021.rs/story/Info/Vojvodina/179945/Staro-mesto-isti-zlocin-novo-trovanje-zivotinja-kod-Apatina.html
34	1/14/2018	Svilojevo, Apatin	<i>Pica pica</i>	1	BPSSS http://www.021.rs/story/Info/Vojvodina/179945/Staro-mesto-isti-zlocin-novo-trovanje-zivotinja-kod-Apatina.html
35	1/31/2018	Ljutovo, Subotica	<i>Buteo buteo</i>	1	BPSSS, Oto Sekereš