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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

32<sup>nd</sup> meeting  
Strasbourg, 27-30 November 2012

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**Complaint in stand-by**

**POSSIBLE SPREAD OF THE AMERICAN MINK  
(*NEOVISON VISON*) IN POLAND**

***REPORT BY THE COMPLAINANT***

*Document prepared by  
Ms Katarzyna Pokrzywa*

Dear Sirs and Madams

I would like to present some information as the answer to the official position of the Polish Ministry of Environment regarding possible spread of American mink population in Poland.

**1. Ministry's statement: American mink is an farm/agricultural animal, therefore it cannot be classified as an Alien Invasive Species (AIS).**

In Polish law it is possible to enlist one species in a couple of lists. The best example for it would be sika deer (*Cervus Nippon*), which is enlisted as:

- a) farm animal in the 29th June 2007 Act on farm animals breeding (The Journal of Laws Dz. U. 2007 No. 133 pos. 921, with am.) (art. 2.1.c) – American mink is included (art. 2.3)
- b) AIS in the 9th September 2011 Ministry of Environment regulation on the list of non-native plants and animals that might endanger native species and natural habitats when introduced to the environment (The Journal of Laws Dz. U. 2009 N. 151, pos. 1220, with am.) – American mink is not included
- c) game (part of wild animals group) in the 11th March 2005 Ministry of Environment regulation on the list of game species (The Journal of Laws Dz. U. 2005 No. 45, pos. 433 and 434, with am.) (art. 1.1.1c) – American mink is included (art. 1.1.2.f).

**2. Ministry's statement: there are only occasional mink escapes from farms.**

I recommend a paper published in Diversity and Distributions (A.Zalewski and others, High mitochondrial DNA diversity of an introduced alien carnivore: comparison of feral and ranch American mink *Neovison vison* in Poland).

**Main conclusions**

American mink in Poland exhibit high genetic diversity and originate from different source populations of their native range. The process of colonization was triggered by numerous escapees from various farms and by immigrants from Belarus. The genetic structure of local feral mink populations was shaped by the founder effect and multiple introductions.

The genomic admixture that occurred during mixing of different populations might have increased the fitness of individuals and accelerated the invasiveness of this species.

Further studies are required to elucidate the mechanisms underlying the potentially increased fitness of individuals and accelerated invasiveness of alien species after the mixing of genetically different populations.”

I hope this clearly shows, that Polish Ministry of Environment has the means and scientific data which enable it at least including American mink in the list of alien and invasive species.

Kind regards

Katarzyna Pokrzywa

On 9th September 2011 the Polish Minister of the Environment passed a Regulation (Journal of Laws Dz.U. No. 210, pos. 1260) which specifies the list of non-native plants and animals that might endanger native species and natural habitats. American mink (*Mustela vison*) has not been included in this list.

Due to this Regulation anybody that wishes to start American mink farm, import, breed or sell minks do not have to apply for prior authorization of the General Directorate for Environmental Protection (GDEP) (Section 120 subsection 2 of Polish Act on environmental protection - Journal of Laws Dz. U. 2009 No. 151, pos. 1220, as am.) nor obtain positive opinions from the State Council for Nature Conservation and District Veterinary Officer.

The American mink population in Poland will no longer be controlled by authorities and no measures are being taken on the governmental level to decline it. Veterinary controls carried out in already existing mink farms proved to be inadequate as the Supreme Audit Office has found that in 2009-2010 87% of fur farms in Wielkopolska Voivodship has not been adhering to the environmental protection regulations, 48% of them were situated in illegally erected buildings and 35% was not adhering to veterinary regulations. This audit has proven that current controls are insufficient, which means that further reduction of restrictions (the above mentioned Regulation) will only make things worse.

This Regulation endangers Polish biodiversity, some of protected species and wildlife habitats. Apart from the animals that are already on Polish and European lists of endangered species, American mink also influences e.g. clutch success rate in Warta River Mouth National Park population of *Anser anser* which was recently only 13.6%.

Furthermore, this Regulation is not in accordance with European Strategy on Invasive Alien Species, as well as the Berne Convention itself and its Recommendations No. 99 and 77 both of which address the problem of IAS.

The decision not to include the American mink in the regulation was mainly based on the opinion of the Ministry of Agriculture and other institutions which stated that American mink in Poland belongs to the livestock under the Act on organization of breeding of livestock and therefore cannot be considered as invasive, alien and possibly dangerous to the environment. This opinion has been provided before the publication of the above mentioned report of the Supreme Audit Office, after which the Ministry ordered its own audit. This proves that the opinion about adequate protection of American Mink farms was not based on a proper data.

This opinion was the main argument against listing American Mink as possibly dangerous for the environment.

Surveys confirm that the American mink is present in the following National Parks: Białowieża (Natura 2000), Biebrza (RAMSAR, Natura 2000), Bory Tucholskie (Natura 2000), Drawa (Natura 2000), Narwa, Wolin (Natura 2000), Słowiński (Natura 2000, RAMSAR), Warta River Mouth (Natura 2000, RAMSAR).