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Адреса для листування: а/с 914, м. Львів, 79008, Україна. Адреса: вул. І. Франка, 9, 1а, м. Львів, 79005, Україна
Тел./факс: +(38) 032-225-76-82. Тел.: +(38) 032-275-15-34. Електронна скринька: office@epi.org.ua. Вебсайт: epi.org.ua

Ministry of Economy, Environment and Agriculture of Ukraine
12/2 M. Hrushevskoho St., Kyiv, 01008
meconomy@me.gov.ua

Appeal
regarding the draft Order of the Ministry of Economy, Environment and Agriculture of Ukraine
“On Approval of the Rules for the State Accounting of Game Animals and the Volume of Their Harvest”

We have learned that, by letter dated 15 October 2025, the State Forest Resources Agency (Derzhlisahentstvo) submitted to the Ministry of Economy the draft Order “On Approval of the Rules for the State Accounting of Game Animals and the Volume of Their Harvest.”

We believe that this Order will create unfounded grounds for counting Red Data Book species as game animals, will allow an increase in the harvest volumes of game animals, and will create legal conflicts with the Procedure for the State Accounting of Rare and Endangered Species of Animals and Plants Listed in the Red Data Book of Ukraine (Order of the Ministry of Ecology and Natural Resources No. 486 of 9 October 2012). The Order also unjustifiably classifies the marmot as a game species, although since 2021 it has been listed in the Red Data Book of Ukraine, as well as a number of other species that fall into categories (groups) that may include both game species and species for which hunting is prohibited.

Thus, the draft Rules, contrary to their main purpose, provide, inter alia, for the accounting of animals listed in the Red Data Book of Ukraine and which cannot be considered game animals, since, pursuant to Article 1 of the Law of Ukraine “On Hunting Management and Hunting,” game animals are wild mammals and birds that may be objects of hunting. In particular, Annex 13 concerns the accounting of waterfowl game (Charadriiformes), a significant number of whose species are included in the Red Data Book of Ukraine (e.g., Eurasian oystercatcher, black-winged stilt, etc.).

Clause 4 of the Rules refers to accounting for the population size and harvest of game animals defined in Article 19 of the Law of Ukraine “On Hunting Management and Hunting.” However, Article 19 contains a list that includes the **marmot**, which is listed in the Red Data Book of Ukraine. Therefore, hunting the marmot is illegal, and this species cannot be considered a game species. Accordingly, the marmot and other species listed in the Red Data Book of Ukraine should be accounted for in accordance with the Procedure for the State Accounting of Rare and Endangered Species of Animals and Plants Listed in the Red Data Book of Ukraine (Order of the Ministry of Ecology and Natural Resources No. 486 of 9 October 2012).

We believe that including, within this procedure, species listed in the Red Data Book of Ukraine, and keeping records not of individual game species but at the level of “species groups” that include both game and non-game species, will lead to distortions in the recorded population size of game

animal populations and may serve as a basis for unjustified inflation of limits for the use of game animals.

In view of the above, we request that appropriate amendments be made to the *draft Rules for the State Accounting of Game Animals and the Volume of Their Harvest*.

Yours Sincerely,

Executive Director

ICO "Environment-People-Law"

Olena Kravchenko

Prepared by:

O. Melen-Zabramna,

A. Pavelko