

European Commission

September 19th 2018

Commissioner for the Environment, Maritime Affairs and Fisheries

Mr. Karmenu Vella

The Danish Government has decided to establish a “wild boar fence” along the German-Danish border

Dear Commissioner

On behalf of the organizations listed below I wish to present our outmost and deepest concern regarding the upcoming establishment of a fence 70 kilometers long, along the German-Danish border.

The [law was adopted](#) by the Danish Parliament June 4th 2018.

The purpose of the fence is to prevent wild boar from migrating from Germany to Denmark and reestablish a Danish population of wild boar.

As a population of wild boar may constitute a “reservoir” for African Swine Fever (ASF) the Danish Government has decided to eliminate wild boar from Denmark by law, and prevent its immigration from Germany.

Obviously, an outbreak of ASF in Denmark would have severe economic consequences for the Danish export of domestic pig products.

As Danish wild boars themselves do not pose a threat, in regard as physically transporting ASF virus cross the German-Danish border, but solely can serve as a reservoir if humans brings the virus to Denmark, we find that a 70 km long fence along the border is completely out of proportions.

The point is emphasized by the fact, that there is no legal action taken to prevent the actual risks of bringing ASF to Denmark:

- No legal efforts to prevent Danish hunters from bringing wild boar meat e.g. from Poland to Denmark are taken.
- No legal efforts preventing potentially ASF-infected food products being brought to Denmark are taken.

Therefore, we find it deeply concerning that efforts to prevent ASF in Denmark are aimed at the potential *reservoir* for ASF, rather than the actual threat of bringing ASF to Denmark. While at the same time extreme measures are taken to eradicate a species native to Denmark.

Furthermore, as an intended barrier for wildlife the fence will have an impact on other species than wild boar, with medium sized mammals hardest affected.

Taking note that the EEA, an agency of the European Union, released a report in 2011 "[Landscape fragmentation in Europe](#)" stating that

"The extent of landscape fragmentation in many parts of Europe is already considerable"

and

"In short, the current trend of steadily increasing landscape fragmentation contradicts the principle of sustainability. There is a clear and urgent need for action".

We find it obvious that establishing a fence along the full length of the German-Danish border contradicts the intentions of the Union aimed at reducing fragmentation.

We take note that the fence may not exclude species listed on the annexes of the Habitat Directive. Referring to the preamble of the [Habitat Directive](#) which states the purpose of the Directive as including establishing "special areas of conservation in order to **create a coherent European ecological network**", as well as article 3 of the Directive that states "**a coherent European ecological network** of special areas of conservation shall be set up under the title Natura 2000", we nevertheless find that a barrier to wildlife is obviously, fundamentally and principally contrary to the intentions of the Directive.

Hence, we find it deeply regrettable that the Danish Government without consultation of the German Government establishes such a barrier.

We also take note, that the [permit](#) does not even provide any clear or specific conditions for an evaluation of neither intended nor unintended consequences of the fence over the coming years. We find this to be deeply concerning in regard to ensuring the free passage of non-targeted species as well as our understanding of obligations in the Habitat Directive.

Therefore, we kindly ask you to request the Danish Government to provide information regarding the planned specific evaluation of intended and unintended consequences of the fence in the coming years.

Also, as ASF is an extremely concerning threat to the interests of the European Union as a whole, we kindly suggest that you encourage the Danish Government to join efforts with Germany, Poland and other member states instead of fencing Denmark against a common threat, without any documentation of the intended effect.

Yours sincerely,



Maria Reumert Gjerding

Chair

Danish Society for Natur Conservation

Signatory Danish organizations

Danish Society for Natur Conservation

Danish Mammal Association

BirdLife/Dansk Ornitologisk Forening

Danish Botanical Society

Animal Protection Denmark

Danish Entomological Society

Danish Anglers Association

Greenpeace Denmark

Geological Society of Denmark

Nature & Youth

Danish Mycological Society

Ecocouncil

Signatory German organizations

Naturschutzbund Deutschland

Bund für Umwelt und Naturschutz Deutschland

Zoologische Gesellschaft für Arten- und

Populationsschutz