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To: Coreper I Deputy Permanent Representatives (by email)

Brussels, 8 May 2024

RE: European Commission proposal to lower the protection status of the wolf under the Bern Convention

Dear Ambassadors,

On behalf of the undersigned conservation and animal welfare organisations, we strongly urge you to reject the European Commission proposal to lower the protection status of the wolf under the Bern Convention at your upcoming meeting. This will send a clear signal that the EU takes its domestic and international commitments to protect and restore biodiversity seriously, on the basis of science-based policy making.

The Commission's proposal for the Council Decision to lower the protection status of the wolf is clearly a politically motivated U-turn. Indeed, the EU rejected similar proposals in 2006, 2018 and 2022 given that there was no justifiable scientific basis to alter this species' protection status. There is still no scientific basis for it now, including in the Commission's in-depth assessment of the situation of the wolf in the EU that was discussed by the experts from your Member States in the relevant Council's Working Party, and which should serve as a basis for your deliberations too.

Despite the fact that the wolf populations are recovering thanks to their strict protection, the wolf continues to be in an unfavourable conservation status in six out of seven EU biogeographical regions according to the latest assessment. Even if the species would be no longer threatened in the foreseeable future, further efforts are required for it to reach a favourable conservation status across the region. Member States are due to assess Favourable Conservation Status of the wolves (and other protected species) in 2025. Adhering to the principles of sound science-based decision-making, it would make it most sensible to await the outcomes of that assessment so that informed decision could be made.

The main argument of the Commission for proposing to lower the protection status of the wolf, is to avoid livestock depredation. However, as highlighted in the own Commission's in-depth assessment, allowing wolf hunting does not reduce depredations. Moreover, the damage to livestock is predominantly a local

issue and remains limited on a large scale. Considering that there are 60 million sheep in the EU, the level of sheep depredation by wolves represents an annual killing of 0.065%. Depredation levels are lower in the areas where large carnivore presence has been continuous compared to areas where they disappeared and returned in the last 50 years. The availability of natural prey, landscape characteristics and the use of protection measures also shape the incidence of damage to livestock.

Therefore, reducing the protection status significantly undermines the continuous efforts to implement measures aimed at fostering co-existence between wolves and local communities. It creates the perception that hunting wolves is a solution to livestock depredation, while it is clear that continued investment in adequately implemented preventive measures is the only effective way to solve wolf-livestock conflicts.

Making decisions not based on science creates a very worrying precedent. It risks eroding a democratic process of decision-making that Europeans can be proud of: the EU institutions agreeing on legislation on the basis of science, citizen interests, and due analysis of costs and benefits of action and inaction. Moreover, such decisions undermine EU's compliance with international commitments, including the Kunming-Montreal Global Biodiversity Framework.

We are very concerned that the discussion on this issue has so far been largely dominated and driven by farming and hunting interests, who are keen to arbitrarily position themselves as speaking on behalf of rural communities. Yet the reality is that there is actually a high degree of support among rural communities for the strict protection of wolves in the EU, as shown by an independent survey, commissioned by several animal protection organisations, which was carried out in November 2023 in ten Member States.

Moreover, the Habitats Directive already offers significant flexibility for Member States to derogate from strict protection and to use lethal measures under clearly defined conditions, which several Member States have made systematic use of.

Based on the arguments outlined above, we urge the Council to reject the politically motivated proposal from the European Commission to downgrade the protection status of the wolf under the Bern Convention.

Instead, the EU needs to:

- Ensure that existing legal protections for wolves, as enshrined in the EU Habitats Directive, are upheld and enforced consistently across the Member States;
- Promote uptake of coexistence measures between wolves and local communities since many of those opportunities, including available financial measures, are currently under-utilised by the Member States;
- Support initiatives that provide accurate, science-based information about wolves to the public.

Protecting wolves in Europe is not only a matter of ecological significance, but also a reflection of our commitment to biodiversity conservation and the values of coexistence and tolerance. Wolves are an

integral part of Europe's natural heritage, playing a vital role in maintaining ecosystem balance and biodiversity, and the return of the wolf to parts of Europe where the species had previously been extirpated is a considerable conservation success that must not be jeopardised.

Yours faithfully,

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