



To: National Focal Points to the Bern Convention (by email)

Brussels, 18 November 2024

Subject: Call to reject EU's proposal to de-list the wolf under the Bern Convention

Dear Sir, Dear Madam,

On behalf of hundreds of thousands European citizens and the undersigned conservation and animal welfare organisations, **we urge you to reject the European Union proposal to downgrade the protection status of the wolf** under the Bern Convention. Attached to this letter you may also find an analysis debunking the arguments put forward by the European Union to justify its proposal.

The European Union proposal to lower the protection status of the wolf is clearly a **politically motivated U-turn away from an ambitious and science-based approach to species and ecosystems conservation**. Indeed, the Parties to the Convention have rejected similar proposals to de-list the wolf in the Bern Convention meetings in 2006, 2018 and 2022 based on the absence of scientific evidence to alter this species' protection status. There is still no scientific justification for it now, as shown also in the Commission's in-depth assessment of the situation of the wolf in the EU published in December 2023. According to Article 7 of the Convention, Parties shall ensure that the protected populations are not in danger. Only when scientific evidence demonstrates that they are not in danger can the change of status from strictly protected to protected be considered, based on adequate justification.

Despite the fact that wolf populations are recovering thanks to their strict protection, the wolf continues to be in a **Near Threatened or Vulnerable conservation status for six out of nine European wolf populations** according to the latest assessment submitted to the Bern Convention Standing Committee. Further efforts are still required to ensure that wolf populations are not endangered and to reach and maintain favourable conservation status across the region.

Making decisions that are not based on scientific evidence would set a very worrying precedent, contradict the provisions of the Bern Convention and **erode democratic decision-making** based on science, citizen interests, due diligence and a thorough analysis of costs and benefits. Moreover, such a decision would **undermine the Parties' compliance with their international commitments to safeguard biodiversity**, particularly the Kunming Montreal Global Biodiversity Framework, including Target 4 prescribing to "effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence".

The Bern Convention already offers significant flexibility for Parties to derogate from strict protection and to use lethal measures where justified under clearly defined conditions, which several Parties to the Convention have made use of. **Parties to the Convention, national**

and local actors are also making continuous efforts to implement measures aimed at fostering co-existence between wolves and local communities. Downgrading the protection status of the wolf now would undermine those efforts, as it fosters the false perception that hunting wolves is a solution to livestock depredation. However, scientific evidence shows that **continued investment in adequate preventive measures is the only effective way to solve wolf-human conflicts, minimise farmed animals' losses and foster coexistence, protecting the interests of farmers, communities and animals.**

In addition, there is a **high degree of support among rural communities and Europeans at large for the strict protection of wolves.** An [ongoing petition organised by Avaaz](#) has already garnered more than 315 000 signatures, urging to maintain the strict protection of wolves.

This indicates the **clear rejection from citizens towards lowering the protection status of the wolf. We trust you will listen to citizens' concerns and science, and strive to achieve coexistence with large carnivores, such as wolves.**

The politically motivated proposal of the European Union risks opening the door to other politically motivated changes to the Bern Convention. This would lead to legal uncertainty, set back years of effective conservation efforts by the Parties, and tarnish the reputation, effectiveness and accountability of the Bern Convention.

We therefore urge you to:

- **Reject the proposal by the European Union to downgrade the protection status of the wolf under the Bern Convention, and instead:**
- Ensure proper enforcement of the existing legal protection provided by the Bern Convention across Parties and eliminate illegal hunting of wolves. Parties have agreed to deter environmental crimes, in particular pursuant to Article 6 of the Convention, not legalise them.
- Provide appropriate tools for livestock farmers to maintain and enhance prevention measures, i.e. the combination of fencing, Livestock Guardian Dogs and human shepherding, hereby protecting pastoralism. These tools have demonstrated their efficiency when compared to culling, have benefited from significant investment over the past decades and are recognised as the appropriate long-term solution.
- Support initiatives to raise citizen awareness and provide accurate, science-based information about wolves to the public.

Thank you for considering this. It will make a fundamental difference.

Yours faithfully,

Avaaz

BirdLife Europe

ClientEarth

Eurogroup for Animals

European Environmental Bureau

Friends of the Earth Europe
Humane Society International/ Europe
International Fund for Animal Welfare
Pro Natura
Pro Wildlife
WWF EPO

Attached documents (2):

- Analysis 'Reviewing the justifications brought by the European Union to propose the downgrade of the protection status of the wolf under the Bern Convention'
- Avaaz petition calling to uphold the current protection status for wolves under the Bern Convention

Reviewing the justifications brought by the European Union to propose the downgrade of the protection status of the wolf under the Bern Convention

Below, we review in detail the claims of the European Union (EU) justifying the proposal to downgrade the protection status of the grey wolf (*Canis Lupus*) under the Bern Convention from Appendix II to Appendix III. We trust that this analysis will help you to make an informed decision on this matter ahead of the Bern Convention Standing Committee meeting.

1st claim: wolf populations have reached satisfactory levels justifying the placement in Appendix III

Legislative framework

Under the Bern Convention, species listed in Appendix III can only be culled as long as this management strategy keeps populations out of danger (Article 7). As a consequence, a modification of the Appendix and the attached protection status should only be granted once the populations have achieved a favourable conservation status which guarantees that populations are already out of danger. This is not the case for most of the grey wolf populations, in particular in the EU.

The situation

The EU notes in the justifications for its proposal that only three of the nine sub-populations in Europe were classified as “Least Concern” in the assessment conducted by the IUCN Large Carnivore Initiative for Europe in 2022, while the others classified as “Near Threatened” or “Vulnerable”. The state of grey wolf populations in the EU is concerning, and these results do not constitute a justification for the downgrade of the protection status of the species. On the contrary, they demonstrate that wolf populations remain in danger.

In addition, the last reporting exercise under Article 17 of the Habitats Directive for the period 2013-2018 concludes that only one of the seven biogeographical populations of wolf in the EU has a favourable conservation status. The next report for the reporting period 2019-2024 is expected next year and must be considered before any informed decision can be taken by the Bern Convention on the basis of the EU proposal. Failing to do so demonstrates a blatant lack of scientific rigor putting biodiversity at risk and should be condemned by all competent institutions.

Besides, we note that wolf populations in the EU were estimated at 20,300 wolves in 2023. If these numbers are accurate, this corresponds to 0.005 wolf per km² or one wolf for each 218 km², the size of greater Amsterdam. In the current biodiversity crisis, it is essential for us to acknowledge, respect and reconnect with these wild animals populating only a small fraction of our land.

Conclusion on the 1st claim

The Bern Convention should ensure that the wolf should remain strictly protected to prevent further threats on populations with favourable conservation status and efficiently conserve populations who do not yet benefit from such a status. At minima, the amendment should only concern biogeographical populations with a favourable conservation status. However, this option is not recommended as it is challenging to implement, requiring high level of coordination between Parties and additional dedicated resources, which are currently lacking. The assessment of the favourable conservation status for the wolf

should follow a harmonised and rigorous methodology based on extensive data¹. Such harmonised methodology and monitoring efforts are not implemented yet by Bern Convention Parties and conclusive results are then not available.

2nd claim: wolves will remain efficiently protected even with a reduced protection status

Legislative framework

The EU claims that the downgrade of the protection status will not lead to diminished protection of the wolf against threats affecting its populations, in particular poaching, habitat fragmentation and wolf-dog hybridisation. In particular, it is questionable whether the reduced protection status and the potential associated culling will have an impact on illegal killing, especially as it can contribute to legitimise it.

When asked if culling derogations with the aim to prevent poaching were justified, the Court of Justice of the European Union stated that poaching was not a justification to grant derogations for the culling of strictly protected species. It further specified that in such a situation, priority should on the contrary be given to strict protection and monitoring².

In addition, identification and prosecution of poaching incidents would be more challenging in a context where the wolf is allowed to be hunted without strict conditions. For instance, it remains uncertain and left to the appreciation of the Parties, including EU Member States, if culling would be conducted by authorised, certified representatives of the public authority or by regular hunters³.

The situation

Multiple studies demonstrate that increased legal culling is associated with increased illegal killing⁴. The downgrade of the protection status of the wolf would therefore likely result in facilitating poaching where efforts should instead be invested to increase capacity of environmental crime prosecutors.

Besides, the reduction of the protection status can be associated with abuse where the legal framework is used to keep areas free of wolves. In Finnish Lapland, where wolves are already listed in Annex V of the Habitats Directive and therefore subject to lethal management measures, they are systematically culled as soon as they step into the area. Last winter, the season of 2023–2024, 50 wolves were legally shot in Lapland and to this day there is no single wolf pack established in the area. Population management hunting permits (for individuals and entire packs) are regularly granted by the authorities, despite the obligation to maintain populations at a favourable conservation status. Because of this lower protection status and flexibility to use lethal control, herders are not incentivised to implement preventive measures.

¹ Such a methodology is currently being developed to inform the next reporting period under the Habitats Directive and could certainly inform any decision and reporting process under the Bern Convention.

² *Tapiola case*, Case C-674/17, ECLI:EU:C:2019:394.

³ It is already the case in some Member States. For instance, in Germany and Austria, several federal states have included the wolf into the list of huntable species (without a hunting season and still full protection) and regular hunters are already involved regarding legal killings.

⁴ Chapron, G. & Treves, A. (2016). Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. *Proc. R. Soc. B* 283: 20152939; Santiago-Ávila, F., Chappell, R. & Treves, A. (2020). Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Scientific Reports*. 10. 10.1038/s41598-020-70837-x; Louchouart, N.X., Santiago-Ávila, F.J., Parsons, D.R. & Treves A. (2021). Evaluating how lethal management affects poaching of Mexican wolves. *R. Soc. Open Sci.* 8: 200330; Treves, A., Elbroch, L.M. & Bruskotter, J. (2024). Evaluating Fact Claims Accompanying Policies to Liberalize the Killing of Wolves. in *Wildlife Conservation & Management in the 21st Century Issues, Solutions, and New Concepts*. Cap.6. G. Proulx, editor. Alpha Wildlife Publication.

Similarly, a strict protection status is more appropriate for a species under increased threat from habitat fragmentation because of border fences and reduction of its habitat, as well as hybridisation, which are the threats listed by the EU in its justifications. It must be recalled that the wolf plays a central role in a healthy ecosystem and a strict protection of its populations benefits other species, including humans.

Conclusion on the 2nd claim

The EU claims that the change in the protection status will not lead to a diminished protection of the wolf against the threats affecting populations, including poaching. Poaching is one of the main threats to wolf populations under the current strict protection status because of poor deterrents and enforcement measures, but experience shows that a reduced protection and an increase in legal hunting will trigger additional illegal killing.

3rd claim: Additional flexibility provides an appropriate means to address the increasing socio-economic challenges, i.e. protecting livestock

Legislative framework

The primary objective of the declassification of the wolf protection status is for Parties to the Bern Convention, including the EU and its Member States, to have a greater legal possibility to implement lethal management strategies on wolf populations, regardless of the actual impact of one specific wolf, as the main problem identified by the EU is attack on livestock. The wolf would become a common game species that could be killed under conditions set by national authorities and quotas determined nationally to maintain satisfactory population levels.

Possibility for derogations exists under the strict protection status that already offers flexibility, in particular to cull specific individuals that cause significant damages as provided by Article 9 of the Bern Convention. The use of these derogations do not show a reduction in attacks to livestock in areas where wolves are killed .

The situation

Multiple studies have been conducted to assess the efficiency of culling on reducing livestock depredation. The results of these studies remain inconclusive and the ones conducted in Europe, corroborated by empirical evidence (e.g. resulting from the culling strategy in France) indicate that increased culling cannot be associated with a diminution of attacks⁵. Some even suggest that it could

⁵ Kotal, M., Duřa, M., Selivanova, A. R. & López-Bao, J. V. (2024). Testing a conservation compromise: No evidence that public wolf hunting in Slovakia reduced livestock losses. *Conservation Letters*, 17, e12994. <https://doi.org/10.1111/conl.12994>; Grente, O., Opitz, T., Duchamp, C., Drouet-Hoguet, N., Chamailé-Jammes, S. & Gimenez, O. (2024). Spatio-temporal dynamics of attacks around deaths of wolves: A statistical assessment of lethal control efficiency in France. <https://doi.org/10.1101/2024.07.18.604079>; Reinhardt, I., Knauer, F., Herdtfelder, M., Kluth, G. & Kaczensky, P. (2023). Wie lassen sich Nutztierübergriffe durch Wölfe nachhaltig minimieren? – Eine Literaturübersicht mit Empfehlungen für Deutschland. In Voigt, C.C. (eds) Evidenzbasiertes Wildtiermanagement. Springer Spektrum, Berlin, Heidelberg. https://doi.org/10.1007/978-3-662-65745-4_9; Krofel, M., Černe, R. & Jerina, K. (2011). Effectiveness of wolf (*canis lupus*) culling as a measure to reduce livestock depredations. *Acta Silvae et Ligni* 95: 11-22; Santiago-Avila, F.J., Cornman, A.M. & Treves, A. (2018). Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLoS ONE* 13(1): e0189729; Treves, A., Elbroch, L.M. & Bruskotter, J. (2024). Evaluating Fact Claims Accompanying Policies to Liberalize the Killing of Wolves. in *Wildlife Conservation & Management in the 21st Century Issues, Solutions, and New Concepts*. Cap.6. G. Proulx, editor. Alpha Wildlife Publication..

lead to an increase of attacks⁶. Such an outcome can be explained because this management method disregards the complex cultural social system of wolf packs. Culling disrupts packs and the learning process of young wolves that do not know how to hunt and would turn to easy prey such as livestock. These results are detailed by the European Commission in its in-depth analysis, failing to scientifically justify the proposal.

Farmed animals are attacked by wolves when they are not protected by preventive measures, i.e. by electrified fences, Livestock Guardian Dogs and shepherds. Many projects show that the appropriate use of those preventive measures is effective in avoiding depredation⁷. They are well accepted by many farmers and shall be further promoted, supported and used, to ensure that every farmer is ready to prevent wolf attacks and to properly protect their farmed animals overtime. In the EU, funding is already available and dedicated to the implementation of preventive methods and should be upscaled to guarantee that farmers across all Member States can put in place and maintain such measures.

Finally, the in-depth analysis provided by the Commission in support of the proposal states that “the level of sheep depredation by wolves represents an annual killing of 0.065%” in the EU. It results from this information that the potential damages caused by the delisting of the wolf protection severely outweigh the potential of damage avoidance.

Conclusion on 3rd claim

The socio-economic challenges associated with the wolf and which livestock farmers are facing should be addressed by implementing prevention measures. Such coexistence measures, including Livestock Guardian Dogs and electric fencing, have demonstrated their efficiency when compared to culling, have benefited from significant investment over the past decades and are recognised as the appropriate long-term solution.

⁶ Wielgus R.B. & Peebles K.A. (2014). Effects of Wolf Mortality on Livestock Depredations. *PLoS ONE* 9(12). <https://doi.org/10.1371/journal.pone.0113505>; Fernández-Gil, A., Naves, J., Ordiz, A., Quevedo, M., Revilla, E. & Delibes, M. (2016). Conflict Misleads Large Carnivore Management and Conservation: Brown Bears and Wolves in Spain. *PLoS ONE* 11(3). <https://doi.org/10.1371/journal.pone.0151541>; Šuba, J., Žunna, A., Bagrade, G., Done, G., Ornicans, A., Pilate, D., Stepanova, A. & Ozolinš, J. (2023). Does Wolf Management in Latvia Decrease Livestock Depredation? An Analysis of Available Data. *Sustainability* 15(11). <https://doi.org/10.3390/su15118509>.

⁷ Bruns, A., Waltert, M. & Khorozyan, I. (2020). The effectiveness of livestock protection measures against wolves (*Canis lupus*) and implications for their co-existence with humans, *Global Ecology and Conservation*, 21. <https://doi.org/10.1016/j.gecco.2019.e00868>; Oliveira, T., Treves, A., López-Bao, J.V. & Krofel, M. (2021). The contribution of the LIFE program to mitigating damages caused by large carnivores in Europe. *Global Ecology and Conservation*, 31:e01815. <https://doi.org/10.1016/j.gecco.2021.e01815>.