



EUROPEAN ALLIANCE FOR WOLF CONSERVATION

RUE D'EDIMBOURG 26, BRUSSELS, BELGIUM

www.wolf-alliance.org

To: All National Focal Points to the Bern Convention

Brussels, November 22nd, 2024

Re: Downgrade of the protection of the wolf in the Bern Convention

On behalf of the European Alliance for Wolf Conservation (EAWC), we are contacting you regarding the proposal by the European Union (EU) to downgrade the protection of the wolf in the Bern Convention at the 44th meeting of the Standing Committee, 2-6 December 2024.

The EU has put forward a proposal to downgrade the wolf's protection status from "strictly protected" (Annex II) to "protected" (Annex III) in the Bern Convention. **The EAWC strongly encourages you not to support this proposal**, as it is not scientifically founded and fails to consider the significant negative consequences that the weakening of the wolf protection status will entail.

We would like to draw your attention to the fact that even though the number of wolves has increased in some of the EU Member States, the European wolves do not belong to one single population, and they are fragmented in nine different populations. Six of these nine populations remain threatened according to the IUCN Red List criteria and only three of them are not threatened (Least concern). Until recent years, there used to be ten wolf populations in Europe. The wolf disappeared in the south of Spain due to high levels of poaching and inbreeding, in spite of it being a strictly protected species.

Particularly, the Scandinavian wolf population is highly threatened (categorized as "vulnerable") due to the high level of inbreeding and the low number of individuals. Regardless of this, the Swedish government has now decided to lower the population level

from 300 to 170 wolves, despite the “endangered” status on the Red List of Species in Sweden. In addition, Norway already conducts a very aggressive culling policy where the number of wolves is kept at 40-60 individuals, with the consequence that the wolf is listed as critically endangered in Norway. In Finland, its wolf population in the southern part of the country is also showing serious signs of inbreeding while in the reindeer husbandry area of Lapland (where wolves are subject to a lower protection status) not a single wolf pack is allowed to live, and population management hunting permits are systematically granted by the authorities. This situation has created a genetic bottleneck in the north of Finland, where wolves are not allowed to migrate to/from Finland to Sweden or Norway, greatly affecting the genetic health of the Finnish and the Scandinavian wolf population. If this situation persists, the Scandinavian wolf population faces an imminent danger of becoming extinct in the next 10-20 years.

There is ample reason to believe that a weakened protection status for the wolf at European level will open the door for more liberalized lethal management policies which will have dire consequences for the wolf in all parts of Europe. This will not only make it more difficult to promote non-lethal solutions to potential conflict situations but will prevent the coexistence between humans and wolves from being realized within the time frame agreed in the Kunming-Montreal Biodiversity Framework in 2022.

As shown in the case of Finnish Lapland and Norway, if lethal measures are the main tool to deal with problem situations, it is very hard to see how this can lead to the implementation of preventive measures and to an increase in the acceptance of wolves and other large carnivores.

The EU Commission has ignored the protests from around 300 European environmental, nature and animal protection associations against the downgrading of protection, as well as all the scientific reports, including information that can be found in the report "*The situation of the wolf (Canis lupus) in the European Union. An in-depth analysis*". This report was ordered by the European Commission, and it formed the basis for the Commission's proposal to downgrade the wolf's conservation status. **The content of the report generally does not support a downgrading of the wolf's protection status. On the contrary, most of the information in the report supports maintaining the current protection level.**

The EU Commission's main justification for downgrading the protection status for the wolf is that it must be possible to regulate the population of wolves in Europe in order to protect livestock. The Alliance emphasizes that the current protection status already allows making exceptions to the strict protection on a case-by-case basis. If the EU opens the door for

regulating the wolf populations, this will entail continuous spending for lethal control and in the end will cost more than non-lethal solutions.

Furthermore, there is not much evidence that hunting wolves will reduce the loss of livestock in the long-term. **There is, however, ample scientific evidence showing that killing wolves is counterproductive to this aim.** This is because when one or both parents in the family group are killed before the pups have learned to hunt natural prey, the young ones are forced to target the easy prey – livestock. Consequently, the number of attacks on livestock can increase as a result of the weakening and splitting of wolf families.

Studies from Idaho in the USA, where the majority of the state's wolves were shot and trapped within two years, showed only a marginal decrease in the number of wolf attacks on livestock in the following years. In Slovakia, no correlation was found between the population control of wolves and the number of attacks on livestock.

The recent statement made by the Large Carnivore Initiative in Europe (LCIE) on the proposed downlisting of the wolf in the Bern Convention mentions that at this time, the proposed generic downlisting of the wolf across the continent does not appear warranted, and that this proposal appears to be premature and faulty. **The LCIE recommends against adopting the EU proposal.**

The EAWC believes that there has been insufficient focus both politically and on the ground on non-lethal measures to protect livestock from wolf attacks. The answer to the problem is not to shoot wolves, but to implement non-lethal measures to protect livestock, such as fencing, guarding dogs, shepherds or any combination of these methods.

The EAWC urges you to vote against the proposal by the European Union to downgrade the legal protection status of the wolf from Annex II (strictly protected) to Annex III (protected) in the Bern Convention at the 44th meeting of the Standing Committee, to be held in Strasbourg on 2-6 December 2024.

Sincerely,

Enrique Pérez

Chairperson

European Alliance for Wolf Conservation

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European Alliance for Wolf Conservation



**Estonian Large
Carnivores,**
Estonia



Ferus,
France



Gruppe Wolf Schweiz,
Switzerland



**Io non ho paura del
lupo APS,**
Italy



**Luchs - und
Wolfsschutz
Bayerischer Wald,**
Germany



Latvijas ainavas,
Latvia



Lobo Marley,
Spain



**Luontoliiton
susiryhmä,**
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**NOAH - for dyrs
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