



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL  
ENVIRONMENT  
Implementation & Support to Member States  
**Mainstreaming & Environmental Assessments**

Brussels  
ENV.E.1/PL/at

Mr Oscar Alarik  
Swedish Society for Nature Conservation  
Box: 4625  
116 91 Stockholm

E-mail: [oscar.alarik@naturskyddsforeningen.se](mailto:oscar.alarik@naturskyddsforeningen.se)

Dear Mr. Alarik,

Thank you for your letter of March 1<sup>st</sup>, 2021 to Commissioner Sinkevičius, who asked me to reply on his behalf.

We very much appreciate the updated information that you provided us on the Swedish licensed hunting of wolves and the figures concerning the impact of these hunts on the population of this species. This information, together with your Memorandum on the history of the infringement case n° 2010/4200, which the Commission initiated against Sweden in 2010 and which is still open, is certainly valuable to our services.

As you pointed out, the wolf is listed in Annex IV of the Habitats Directive and as such is a strictly protected species for which regular hunting is prohibited in Sweden. Derogations from this strict protection are only allowed for the motives enumerated under Article 16 of the Directive and with the conditions that there is no satisfactory alternative and that the derogation is not detrimental to the maintenance of the wolf populations concerned at a favourable conservation status in their natural range. The Court has already clarified the scope of the above provisions, including in its ruling of 10 October 2019 (case C-674/17, Tapiola).

In our regular bilateral exchanges with the Swedish authorities, we have been consistently conveying our concerns about their practise. In particular, we regularly insist on the fact that the low population threshold that Sweden has defined as a favourable reference population for the wolf appears to be more based on the concept of minimal viable population and is unlikely to match the requirements on favourable conservation status, as well as on our views on the conditions each derogation from the strict protection is required to fully meet, along the lines of the judgment in the Tapiola case.

We are currently assessing the most recent replies of the Swedish authorities and the latest decisions by the Swedish authorities and Courts in this context, together with additional legal and scientific elements relevant for upcoming proceedings in the on-going infringement. Please rest assured that the information you shared with the Commission services features among these elements and receives the appropriate attention by our services.

Yours faithfully,

*(Electronically signed)*

Sabine BOURDY  
Head of Unit