

## Open Letter to the Polish Presidency to the EU signed by 41 Associations

### Wolf downlisting under scrutiny

*The European Commission's unique science backing is now challenged by an independent science review, a Judicial case at the CJEU and a Complaint at the Ombudsman are pending – all this should prevent the EU Council to move ahead with downlisting before clarity is secured.*







3 April 2025

## **Open Letter to the Polish Presidency to the EU signed by 41 Associations**

CC: Ambassadors of the Member States to the EU

CC: Presidents Political Groups in the European Parliament

CC: National Members of Parliament

CC: European Commission

### **Wolf downlisting under scrutiny.**

The European Commission's unique science backing is now challenged by an independent science review, a Judicial case at the CJEU and a Complaint at the Ombudsman are pending – all this should prevent the EU Council to move ahead with downlisting before clarity is secured.

We, 41 Associations, congratulate Poland for the decision to keep strict protection of wolves and we call on the Polish Presidency to the EU to suspend any vote at EU level pending the numerous uncertainties associated with an ungrounded wolf downlisting. Accountability towards European citizens and clear implementation of the EU Nature protection laws can now be restored by Member States. Chez Republic already moved in that direction notifying within the Bern Convention their refusal to apply downlisting together with UK and Monaco.

### **Dear Polish Presidency to the EU**

We congratulate you for your intention to keep strict protection for wolves at national level<sup>1</sup> and we applaud to the recent Polish State Council for Nature conservation Opinion<sup>2</sup> recommending upholding an EU decision regarding downlisting<sup>3</sup> given the uncertain scientific backing and pending the legal and judicial inquiries.

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[Wiceminister środowiska: Polska nie zamierza obniżyć statusu ochrony wilka | Nauka w Polsce](#)

<sup>2</sup> <https://www.greenimpact.it/science-policy-and-laws-to-prevent-the-killing-of-wolves-in-europe/>

We present you with an independent review of the unique source of scientific backing (2023 Blanco and Sundseth) used by the Commission in the last 2 years to justify downlisting. This sole report has been presented by the Commission to ground wolf downlisting at the Bern Convention and has not been subjected to a peer-review process being a report commissioned out by the Commission itself. We have already mentioned several times that the European Scientific Community recommended against downlisting (see references), now the independent peer-review we present to you today (M. Fisher and E. Randi, 2025)<sup>4</sup> confirms that the 2023 Blanco and Sundseth report cannot be used to justify downlisting (Link and Annex) nor the same report recommends it.

A case before the European Court of Justice (Case T-634/24) -- put forward by 5 Associations and for which 17 other Associations just deposited an act of intervention -- asking to annul 2024 the Council decision on downlisting, is now running and we would urge to take it in consideration and therefore postpone a vote on the matter till the case would be resolved. A complaint regarding the 2024 Commission's downlisting proposal - filed by Client Earth - is also pending at the EU Ombudsman (in references).

The institutional decision-making process leading to the downlisting is also recognized as having legal shortcomings, including the emergency procedure the Council and European Parliament has been asked to use for accelerating a final vote. A vote by Unanimity is requested by the Habitats Directive for Annex IV species and clearly, given the current circumstances, there cannot be such a wide and strong support to move ahead with downlisting. We recall that in 2024 Spain and Ireland voted against, Belgium, Slovenia, Malta and Cyprus abstained, and Czech Rep. has cleared at Bern Convention that that decision does not apply to them (together with UK and Monaco). Moreover, legally speaking, the EU is not bound to translate the Bern Convention decision of last December into EU law. In the EU, we have a stricter legal regime which we are fully legally entitled to maintain. The wolf Bern Convention decision is the result of the fact that EU - 27 holds majority power in that Convention and therefore rule, regardless of the positions of the other Contracting Parties - which, in this specific case, have been forced to accept the same wolf downlisting against which the EU - 27 voted in 2022 when proposed by Switzerland. Moreover, the Bern Convention did not apply an independent scientific scrutiny of the EU wolf Proposal before the vote took place, and therefore the EU Proposal passed despite lacking scientific grounds. Maintaining the current EU legislation would not result in any breach of international law.

We also would like to highlight that the EU system is well equipped for managing possible predations by wolves, the matter is only a problem of good implementation. A system of subsidies for preventive measures and reimbursement of losses is secured through CAP. These methods are very effective when used correctly and in a comprehensive way. Moreover, a minority of farmers are affected by possible predators and primarily the ones doing sheep

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<sup>4</sup> <https://www.greenimpact.it/science-policy-and-laws-to-prevent-the-killing-of-wolves-in-europe/>

and goat farming. Within the livestock sector, only 16.67% of farms are specialized in sheep and goat farming. Consequently, in the overall EU agricultural sector, only 3.6% of farms are dedicated solely to sheep and goat production<sup>5</sup>. Most of the agriculture sector does not deal with livestock, only 21,6% and most majority of this sector is not affected by predations. Predations of sheep by wolves in the EU count for 0,07% of the total number of sheep in the EU ( 2024). Moreover in 2024 Judgements (Austria and Spain, C601/2022; C436/22) , the European Court of Justice confirmed the need to maintain strict protection and that the need to secure favorable conservation status prevails over socio- economic considerations. We also add that there is no evidence- based record of a wolf attack to humans in the last 100 years and that the EU has invested about 200 Million euro on wolf conservation only in the last 30 years (LIFE +) as a confirmation of the European citizens interest on the conservation and protection of this species.

This is to say that what States need to do is to invest in better implementation at local level and speeding up the delivery of existing CAP- based compensatory fundings.

Better implementation should also address the problem of widespread illegal killing and deaths of wolves which involved thousands of animals for year. Moreover, we are still waiting for a Commission's response about our letter (31 January 2025, signed by 70+ NGOs) on the need to act against wolves illegally killed in Sweden.

**We respectfully ask you not to put wolf downlisting of the agenda of your EU Presidency before all the existing pending uncertainties (science and procedures) as well as legal and judicial processes would be resolved.**

Look forward to hearing from you

Best Regards

41 Associations of the cover page

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## REFERENCES

### Scientists recommending against downlisting

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<sup>5</sup> November 2022: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Farms\\_and\\_farmland\\_in\\_the\\_European\\_Union\\_-\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Farms_and_farmland_in_the_European_Union_-_statistics)

Link to the 700 signatures

<https://drive.google.com/drive/folders/13Y4fuG3OpUKY7Wtw9Y2dMbfpBVeGuyMy>

### **Large Carnivore I for Europe/IUCN statement and IUCN statement, against downlisting**

- 13 November 2024: [https://lci epub.nina.no/pdf/638670498186284408\\_LCIE%20-%20statement%20on%20wolf%20downlisting%20proposal.pdf](https://lci epub.nina.no/pdf/638670498186284408_LCIE%20-%20statement%20on%20wolf%20downlisting%20proposal.pdf)
- 13 December 2024: <https://iucn.org/news/202412/concerns-over-eus-wolf-downlisting-proposal>

### **A few previous NGOs letters:**

- 31 January 2025 - Joint NGOs Open Letter on Wolves - Reverse the unjustified wolf protection downgrade at the Bern Convention: <https://www.greenimpact.it/wp-content/uploads/2025/02/Joint-NGOs-Open-Letter-on-Wolves-Bern-Convention.pdf>
- 31 January 2025 - Joint NGOs Open Letter on the Killing of Wolves in Sweden (70+ logos): [https://www.greenimpact.it/wp-content/uploads/2025/02/Lettera-Lupi\\_Sweden.pdf](https://www.greenimpact.it/wp-content/uploads/2025/02/Lettera-Lupi_Sweden.pdf)
- 26 November 2024 - Open letter - The EU Proposal on Wolf downlisting is unlawful: [https://www.greenimpact.it/wp-content/uploads/2024/11/VERSIONE-29-11\\_Open-Letter-26-November-2024\\_compressed.pdf](https://www.greenimpact.it/wp-content/uploads/2024/11/VERSIONE-29-11_Open-Letter-26-November-2024_compressed.pdf)
- 29 October 2024 – Open Letter to the Secretary General of the Bern Convention -The wolf targeted by false science provided by the European Commission: <https://www.greenimpact.it/wp-content/uploads/2024/11/Secretary-General-Bern-Convention-Open-Letter.pdf>
- 19 September 2024 - Letters signed by 300 NGOs: <https://wwfeu.awsassets.panda.org/downloads/wolf-protection---joint-statement-september-2024.pdf>

### **5 Associations' Appeal vs Council and European Commission before the European Court of Justice (Case T-634/24) on annulment of the 2024 Council decision on wolf downlisting at the Bern Convention. Supported with an act of intervention by other 17 Associations**

- 17 February 2025 – Appeal by Green Impact (Italy), Earth (Italy), Nagy Tavak (Hungary), LNDC Animal Protection (Italy), and One Voice (France), Published on the OJ of the EU: [https://www.greenimpact.it/wp-content/uploads/2025/02/OJ\\_C\\_202500922\\_EN\\_TXT.pdf](https://www.greenimpact.it/wp-content/uploads/2025/02/OJ_C_202500922_EN_TXT.pdf)

- 26 March 2025 - 17 Associations which made an act of intervention on the Appeal: LEIDAA (Italy), Federazione Nazionale Pro Natura (Italy), Swedish Carnivore Association (Sweden), Finnish Animal Right Lawyers Association (Finland), Animal Cross (France), Pôle Grands Prédateurs (France), Swedish Society for Nature Conservation (Sweden), Asociación Animalista LIBERA! (Spain), Io non ho paura del lupo (Italy), Stowarzyszenie Pracownia na rzecz Wszystkich Istot (Poland), ASPAS (France), FERUS (France), OIPA (Italy) ; LEAL (Italy), ASCEL (Spain) , WWF Italy and Legambiente (Italy).

**Formal Complaint filed by ClientEarth to the EU Ombudsman on the Commission Proposal to delist wolf protection, the investigation has been formally launched:**

28 October 2024: <https://www.ombudsman.europa.eu/fr/opening-summary/fr/194686>

**Bibliographic sources:**

1. November 2022: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Farms\\_and\\_farmland\\_in\\_the\\_European\\_Union\\_-\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Farms_and_farmland_in_the_European_Union_-_statistics)
2. 24 January 2024: <https://www.science.org/content/article/plan-allow-wolf-hunting-europe-protect-livestock-could-backfire-some-scientists-say#:~:text=As%20the%20number%20of%20wolves,statement%20that%20accompa,nied%20the%20proposal>
3. June 2015: [https://vlaamsvredesinstituut.eu/wp-content/uploads/2019/04/factsheet\\_firearms\\_and\\_deaths\\_in\\_eu.pdf](https://vlaamsvredesinstituut.eu/wp-content/uploads/2019/04/factsheet_firearms_and_deaths_in_eu.pdf)
4. 20 September 2020: [\(PDF\) Wild ungulate overabundance in Europe: contexts, causes, monitoring and management recommendations](#)
5. 19 October 2017: [L'evoluzione della distribuzione e consistenza degli ungulati in Europa - Accademia dei Georgofili](#)
6. 14 January 2025: <https://www.sciencedirect.com/science/article/pii/S2351989425000290>

**EU LIFE – and Wolves: 1996- 2022**

From 1996 to 2022, there have been nearly 60 LIFE projects focused on the conservation and protection of wolves in the EU. Considering an average budget of €3,000,000 per project, we can estimate that the funds invested in the conservation and come back of the wolf in Europe amount to approximately €180,000,000.



LINK: [LIFE 3.0 - LIFE Project Public Page](#)

**European Survey, Large Carnivores and attitudes of farmers in rural communities (2023, Eurogroup for Animals)**

[https://www.eurogroupforanimals.org/files/eurogroupforanimals/2023-11/20231129\\_Survey%20Report%20Large%20carnivores.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2023-11/20231129_Survey%20Report%20Large%20carnivores.pdf)

[https://www.youtube.com/watch?v=J8Sx-n4oz\\_4](https://www.youtube.com/watch?v=J8Sx-n4oz_4)