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Commission's proposed amendment of Appendices II and III of the Bern Convention

On 24th January 2024, the ENVI Committee will discuss the Commission's Proposal for a Council Decision on the EU's position on submitting proposals for amendment of Appendices II and III of the Bern Convention. This proposal is clearly intended as the first step in downgrading the protection status of wolves in Europe, and will ultimately open the door to the future amendment of the Habitats Directive, and the potential weakening of legal protections for large carnivores and other species in the EU.

As environmental and animal protection organisations, we are united in our opposition to this proposal, which appears to be politically motivated, rather than based on reliable scientific evidence. We maintain that responsible wildlife management and conservation must be driven by science-based data, rather than the opinions, economic and political interests of those who are conducting a witch-hunt against wolves and other large carnivores.

European Commission U-turn on wolves is scientifically unjustifiable

Until now, the European Commission has steadfastly maintained a science-based position on the need to uphold the strictly protected status of wolves and other large carnivores. We note that the EU rejected similar downlisting proposals put forward by Switzerland in 2006, 2018 and 2022 to amend the Bern Convention appendices, because there was no justifiable scientific basis to alter the protection status of wolves.

In the interim, there have been no scientific developments that would justify a change in this position. In fact no scientific data supporting a change were provided by the new Commission's [report](#) upon which this decision-making is apparently based. The wolf was in an unfavourable-inadequate conservation status in six out of seven EU biogeographical regions according to the latest assessment of the conservation status based on reports by Member States in 2019. Moreover, we observe that **hundreds of wolves are already killed each year in the EU, using the existing exemptions in the Habitats Directive**, which indicates that there is already considerable flexibility in the implementation of the legislation.

We also note that two thirds of respondents to the call for additional evidence initiated in September 2023 were in favour of maintaining the protection status of the wolf. Even though The Commission's press release called for additional evidence and made unsubstantiated claims about the potential dangers posed by wolves, due to lack of proper public consultation, the exercise was de facto seen as opportunity to express opinions of the Europeans on this very important matter.

Mitigation measures and compensation possibilities underutilised

The impetus to change the protected status of wolves is being clearly driven by agricultural interests, yet it is pertinent to note that damage to and losses of farm animals is often linked to the lack of adequate supervision and/or physical protection against predators.

This is despite the fact that there are sufficient EU and national guideline documents, good practices, and tools available to prevent and compensate for the economic damage caused by wolves. Good practices include the training of dogs to protect herds, education of herders, tools and technical solutions to deter wolves.

In addition, the European Union Guidelines for State Aid in the agricultural sector allow EU Member States to grant full compensation to farmers for damages caused by protected animals, such as wolves. This also makes it possible to fully reimburse costs of investments made to prevent such damages, for example installing electric fences or acquiring guard dogs. Regrettably, these opportunities are presently being underutilised.

Significant support for coexistence with wolves in rural communities

It is apparent that the agricultural and hunting interest groups lobbying for the downgrading of the protection status of wolves do not necessarily represent the views of all those living in rural areas. Indeed, a [survey conducted by Savanta](#) in November 2023 among a sample of 10,000 inhabitants of rural areas in 10 Member States (Germany, France, Spain, Netherlands, Italy, Belgium, Poland, Denmark, Sweden and Romania) found that many rural inhabitants are supportive of protecting wolves and other large carnivores, with 68% stating that they should be strictly protected and over two-thirds (72%) agreeing that they have a right to co-exist. This survey also found that a very low proportion of respondents indicated that they feel well-represented by hunting (12%) and farming (18%) interest groups.

Commitment to protecting biodiversity must be maintained

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. Ironically, the conservation success of wolves is now being used as a rationale to downgrade their legal protections.

We maintain that unless there is substantial new science-based evidence presented by the European Commission services, the modification of the protection status of the wolf - either under the Bern Convention or EU Habitats Directive - is not justified.

Instead, the EU must:

- 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 are under-utilised by the Member States.
- support initiatives that provide accurate, science-based information about wolves to the public.