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NGO reaction to the European Commission's communication on wolves in Europe

To
President Ursula von der Leyen
President of the European Commission

Brussels, 11 September 2023

Dear President von der Leyen,

On behalf of the undersigned environmental and animal protection organisations, we are writing in response to the Commission's [press release on 'Wolves in Europe'](#) dated 4th September 2023. We would like to express our deep concerns about the misleading information this communication spreads regarding wolves in Europe.

Misleading information regarding wolves

Regarding the dangers posed to humans and livestock, the messaging in the press communication is misleading, and it preempts the result of the public consultation. The claim that the concentration of wolf packs has become a danger for livestock and potentially for humans is not based on science.

In Europe, the wolf is not considered to be dangerous for humans. Scientific evidence has shown that wolves do not treat humans as prey, and fatal encounters are exceptional, in contrast to a number of real and significant threats to human life (such as extreme weather events or car accidents and pollution). Damage to livestock is often linked to the lack of adequate supervision and/or physical protection.

Tools available to protect livestock

EU and national guideline documents, good practices, and tools are 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. 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. In addition, rural development funds in the EAFRD have the potential to support coexistence, notably via investments and increased agro-environmental area payments for areas where the presence of large predators might prevent delivery of environmentally beneficial grazing practices. These opportunities are presently underutilised.

Consultation breaches Commission's Better Regulation rules

Any decision to change the conservation status of wolves must be based on reliable scientific data, according to the provisions of the relevant legislation, and not on anecdotal evidence submitted through a non-transparent and irregular consultation process.

It is incomprehensible that the Commission announced the collection of data on "challenges related to the return of wolves" for an 18-day period via a dedicated Email address. We contend that this violates the Commission's own rules with regard to Better Regulation. The Better Regulation Guidelines require that all stakeholders should have a reasonable period in which to make informed and effective contributions. 18 days is not a reasonable period.

The Commission should already be in the possession of significant data from the recently conducted Fitness Check of the Nature Directives, as well as from Member States reporting under the requirements of the Habitats Directive, including in relation to the existing derogations.

Call to action

As President of the European Commission, you are in a unique and authoritative position, and we are greatly alarmed by the misleading social media comments on wolves that were issued in your name. 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 Europe is a considerable conservation success that must not be jeopardised.

The European Commission must set an example for sound policymaking, and responsible wildlife management and conservation that is driven by science-based data, rather than the opinions and economic interests of a few.

We would like to get clarity on the Commission's impartial position on this issue.

Yours sincerely,

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Gabriel Schwaderer, Executive Director, EuroNatur

Dr Joanna Swabe, Senior Director of Public Affairs, Humane Society International/Europe (HSI)

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Dr Mark Jones, Head of Policy, Born Free Foundation

Faustine Bas-Defossez, Director for Nature Health and Environment, European Environmental Bureau (EEB)

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Anaïs Berthier, Head of ClientEarth Brussels office

ANNEX - NGO reaction to the Commission's communication on wolves in Europe

Details on Better Regulation Guidelines

According to Chapter II of these Guidelines, public consultations are to be published on the "Have your Say" web portal, and must be published for a period of 12 weeks (Chapter II.3). Stakeholder contributions to these consultations are also routinely published on this website and the main outcomes presented in a report, thereby ensuring both transparency and public access to the data submitted.

The Habitats Directive

The recent Fitness Check of the Habitats Directive concluded that Council Directive 92/43/EEC was fit for purpose and only required better implementation and enforcement by the Member States. To that effect, the Commission, through its dedicated stakeholder groups, has recently spent years - and resources - culminating in the Guidance to Member States on the Strict Protection of Large Carnivores, published in 2021. Furthermore, the Commission's Work Programme for 2023/2024 did not foresee any amendment of this legislation.

Hundreds of wolves are already killed each year in the EU, using the existing exemptions in the Habitats Directive, indicating that there is already considerable flexibility in the implementation of this EU legislation. Changing the protected status of and killing more wolves will not solve fundamental sectoral problems faced by those who have been spearheading the crusade against large carnivores, and would legitimise the removal of individuals as the only solution to conflicts.

Wolf populations are growing, thanks to the strict protection of the species. However, they are as yet far from being in Favourable Conservation Status across the continent. Of the 9 transboundary wolf populations in the EU, 6 have a vulnerable or near threatened status. In addition, the fact that a species is not threatened (i.e. not faced by any direct extinction risk) does not necessarily mean that it has Favourable Conservation Status. According to the Rulings of the European Courts of Justice on Article 6 of the Habitats Directive, Member States have to do more than simply prevent the further deterioration of protected species and habitat types. They must also undertake positive management measures to ensure their populations are maintained at, or restored to, a Favourable Conservation Status throughout their natural range within the EU.

Growing evidence is available of the conservation and economic benefits of the presence of wolves. It is regrettable that while wolves can cause genuine problems for some farmers and other animal the species is increasingly being used as a political scapegoat to divert attention from broader socio-economic problems plaguing farming and rural communities. The negative tone of this recent EC press release risks vilifying this species that plays a crucial ecological function and could result in retaliatory actions that endanger animal welfare and conservation status

The return of the wolf to Europe is one of the undoubted success stories of European conservation. The recovery of a species with such an ecological range would not have been possible with national legislation alone, and is a clear testament to the workings of the Nature Directives. These successes should rather be celebrated, with a proportionate response to any problems that may arise, rather than a return to the practices of the past.

Summary of recommended actions for the European Commission:

- Ensure **science-based policy and strengthen legal protections**: Ensure that existing legal protections for wolves, as enshrined in the EU Habitats Directive, are upheld and enforced consistently across member states. Strive for keeping and fully implementing the strict protection of the species.
- **Combat disinformation**: Ensure that Commission communication does not result in the spread of misinformation and baseless claims about wolves. Collaborate with Member States to counter false narratives and promote fact-based discussions.
- Promote **science-based education**: Support initiatives that provide accurate, science-based information about wolves to the public, including schools, media outlets, and local communities. Emphasise their essential role in maintaining healthy ecosystems.
- Support **coexistence**: Encourage coexistence measures between wolves and local communities, including the implementation of non-lethal livestock protection methods and compensation programmes for farmers who experience genuine wolf-related losses and/or take mitigation measures against predation from large carnivores. It is necessary to further raise awareness among Member States and farmers about the availability of 100% financial remuneration for losses and mitigation measures under the framework of State Aid.
- Engage **stakeholders**: Facilitate constructive dialogues involving conservationists, scientists, farmers, and local communities to find common ground and develop practical solutions for wolf conservation.