Open letter: Decision on potential modification of the protection status of the wolf

By email: Ursula.VON-DER-LEYEN@ec.europa.eu

Brussels, 18th December 2023

Dear President von der Leyen,

On behalf of almost 300 undersigned environmental and animal protection organisations, we are writing with regard to the European Commission's commitment to "decide on a proposal to modify, where appropriate, the status of protection of the wolf within the EU and to update the legal framework, to introduce, where necessary, further flexibility" by the end of the year [1].

It is of significant concern that a policy decision on such a crucial issue is being prepared in an untransparent manner. Moreover, it is based on an irregular consultation process that was launched by the Commission's press release on 'Wolves in Europe' on 4th September 2023, which included misleading information regarding wolves. Our concerns about this were outlined to you in our letter dated 11 September 2023[2].

We would like to re-emphasise that any decision to change the protection 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.

Furthermore, we are concerned that the discussion of this issue has so far been largely dominated and driven by farming industry and hunting interest representatives, who are keen to position themselves as speaking on behalf of rural communities. Yet the reality is that there is actually a high degree of support among rural communities for the strict protection of wolves in the EU, as shown by an independent survey, commissioned by several animal protection organisations, which was carried out in November 2023 in 10 Member States[3].

Unless there is substantial new science-based evidence gathered by the European Commission services, we believe the science and public opinion are clear: the modification of the protection status of the wolf - either under the EU law or the Bern Convention - is not justified.

Instead, the EU needs to:

- 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.

[1] as stated on the EC web-page on large carnivores https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive/large-carnivores_en

[2] The joint letter by eight European NGOs challenges a recent press release by the European Commission that suggests that wolves pose a significant danger to humans and livestock and highlights concerns regarding irregular consultation process (available at https://eeb.org/library/ngo-reaction-to-commissions-communication-on-wolves-in-europe)

[3] available at https://www.eurogroupforanimals.org/news/survey-wolves-should-be-strictly-protected-majority-rural-inhabitants-say

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.

We urge you to take the recommendations of broader civil society seriously in your preparation of the European Commission's decision.

Yours sincerely,

Patrick ten Brink

Secretary-General

European Environmental Bureau (EEB)

On behalf of the undersigned environmental and animal protection organisations *(in alphabetical order):*

1. Animal Cross

2. Associazione Italiana per l'Ambiente
   la Cultura
   le Emergenze

3. Aegean Wildlife Hospital

4. Aevis Foundation

5. African Conservation Foundation

6. AG Wildtiere

7. Agent Green

8. Aktionsgemeinschaft Artenschutz

9. ALAMBI - Associação para o Estudo e Defes ado Ambiente do Concelho de Alenquer

10. Albatros Foundation

11. Alianța pentru Combaterea Abuzurilor

12. ALKA Wildlife

13. Almargem - associação de Defesa do Património cultural e Ambiental do Algarve

14. Alpe Adria Green Slovenia

15. Alsace Nature

16. AMUS

17. ANIMA
Hellenic wildlife care association

18. Anima Helvetia

19. Animal Action Greece

20. Animal Alliance of Canada

21. Animal Defenders International

22. Animal Protection Party of Canada

23. Animalistes per la independència

24. APS Amici dei Parchi di Monteveglio e dell'Emilia

25. ARCHELON The Sea Turtle Protection Society of Greece

26. ARCTUROS

27. Arend de Haas, Rewilding Academy

28. ARION-Cetacean Rescue and Rehabilitation Research Center

29. ARK Rewilding Nederland

30. ASCEL
Association for Gray Wolf Conservation and Study in Spain

31. ASN - Associação Sociedade e Natureza

32. Asociación Animalista Libera!

33. Asociatia Kogayon

34. ASPA Vosges

35. ASPAS, Association pour la protection des animaux sauvages

36. Associação PATO

37. Associação Transumância e Natureza

38. Association “Gyvo Zalio”

39. Association Biom

40. Association for Nature Conservation “Baltijos vilkas”

41. Association for Nature Conservation Tapiola ry Luonnonsuojeluliitto Tapiola ry

42. Association for the Conservation of Biological Diversity

43. Austrian Youth Biodiversity Network

44. Avenir Loup Lynx Jura

45. AVES FRANCE

46. Baleine Sous Gravillon

47. Balkani Wildlife Society

48. Bamff Wildland

49. Biodiversity Conservation Center

50. BiodiversityGR

51. Biofuelwatch

52. Biomass Action Group (BAG)

53. BirdLife Europe and Central Asia

54. DOF BirdLife

55. BirdLife Finland

56. BirdLife Hungary/MME

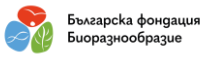
57. BirdLife Sweden

58. Bond Beter Leefmilieu

59. Born Free Foundation

60. BOS+

61. Bulgarian Biodiversity Foundation



62. Bulgarian Environmental Partnership Foundation

63. Bulgarian Society for the Protection of Birds

64. Bund für Umwelt- und Naturschutz Deutschland e.V. (BUND)

65. BUND Naturschutz in Bayern e. V.

66. C'est Assez!

67. Calla - Sdružení pro záchranu prostředí, z.s.

68. CALLISTO Wildlife and Nature Conservation Society

69. Center for Environment

70. Center for environmental research and information "Eko-svest"

71. Center for protection and research of birds

72. Centre4NI.com

73. Čergovfilm

74. Chráníme stromy

75. CIDAMB

76. CIPRA International - International Commission for the Protection of the Alps

77. ClientEarth

78. Codrii Iasilor [Old Growth Forests of Iasi]

79. Colla ecologista l'Arrel

80. Danish Society for Nature Conservation

81. Danmarks Vilde Natur

82. Dansk Botanisk Forening

83. DAPHNE - Institute of applied ecology

84. David Shepherd Wildlife Foundation

85. De Unge Biodiversitetsambassadører (Youth biodiversity ambassadors, Denmark)

86. Děti Země (Children of the Earth)

87. Deutsche juristische Gesellschaft für Tierschutzrecht e.V.

88. Deutscher Tierschutzbund e.V.

89. Dier&Recht

90. Dierenbescherming

91. Dierencoalitie

92. Dinaricum society

93. Djurskyddet Sverige

94. Drasi gia tin agria zoi / Action for Wildlife

95. Dyrenes Beskyttelse

96. Earth Action, Inc.

97. Ecoflix

98. Ecological Alliance

99. Ecological Recycling Society

100. Ecologistas en Acción

101. EDEN center

102. Elephant Reintegration Trust

103. Eliante

104. ELLINIKI ETAIRIA-Society for the Environment and Cultural Heritage

105. EMS Foundation

106. Endelave Natur og Miljø

107. Environmental Organisation iSea

108. Environmental Pillar

109. Eurogroup for Animals

110. EuroNatur

111. EUROPARC
Europeanwide Protected Areas Network

112. European Alliance for Wolf Conservation

113. European Chapter of the Society for Ecological Restoration

114. European Environmental Bureau (EEB)

115. European Wilderness Society

116. European Young Rewilders

117. FAPAS - Associação Portuguesa para a Conservação da Biodiversidade

118. Federazione Nazionale Pro Natura

119. FERUS Ours-Loup-Lynx Conservation

120. Focale pour le Sauvage

121. Fondation Brigitte Bardot

122. Fondation SOS Chats Noiraigue

123. Foundation Conservation Carpathia

124. FOUR PAWS International

125. France Nature Environnement

126. French Mammal Society

127. Friends of Fertő Lake Association

128. Friends of the Earth Europe

129. Friends of the Earth Czech Republic

130. Fundacja Dzika Polska

131. Fundacja Rolniczej Różnorodności Biologicznej AgriNatura

132. Future 4 Wildlife

133. GEOTA

134. **Gesellschaft zum Schutz der Wölfe e.V.**

135. Global Rewilding Alliance

136. Global White Lion Protection Trust

137. Global Youth Biodiversity Network (Europe)

138. Great Lakes & Wetlands Association

139. Green Impact

140. Greenpeace European Unit

141. Grupo Lobo - Associação para a Conservação do Lobo e do seu Ecossistema

142. Hellenic Animal Welfare Federation

143. Hellenic Ornithological Society

144. Hellenic Society for the Protection of Nature - HSPN

145. Humane Society International/Europe (HSI)

146. Humanité et Biodiversité

147. IFAW

148. IG Berner Wald

149. IG Wild beim Wild

150. Institute for Environmental Studies, Faculty of Science, Charles University

151. Institute of Vertebrate Biology CAS

152. International Otter Survival Fund

153. Io non ho paura del lupo APS

154. Italian Youth Biodiversity Network (GYBN Italia)

155. Kemeri National Park Fund

156. Landschappen

157. Latvian Ornithological Society

158. Latvijas ainavas — Wildlife NGO, LATVIA

159. Lesoochranárske zoskupenie VLK (WOLF Forest Protection Movement)

160. Lipensko pro zivot

161. Lobo Marley

162. Loomus

163. LPN - Liga para a Protecção da Natureza

164. LPO France

165. Luchs- und Wolfsschutz Bayerischer Wald

166. Luontoliiton susiryhmä (The Wolf Action Group)

167. MEDASSET - Mediterranean Association to Save the Sea Turtles

168. MedINA

169. Menschen für Tierrechte – Bundesverband der Tierversuchsgegner e.V.

170. Merman Conservation Expeditions Ltd

171. Milvoz - Associação de Protecção e Conservação da Natureza

172. MOm/Hellenic Society for the Study and Protection of the Monk Seal

173. My sme les

174. NABU Bundesverband Germany

175. NABU (Naturschutzbund Deutschland) Kreisverband Heidekreis e.V.

176. Naturschutzbund Deutschland) Landesverband Niedersachsen e.V.)

177. Natagora

178. National Wolfwatcher Coalition

179. natur&ëmwelt a.s.b.l.

180. Natura 2000 Coalition

181. Natural Heritage Foundation

182. Naturalists Club Poland

183. Nature Nova Scotia

184. Nature Trust - FEE Malta (NTM)

185. Naturefund e. V.

186. Naturschutzbund Österreich

187. Naturwald Akademie

188. Natuurpunt

189. NBSCLIMATE

190. NDMALO-GE

191. Network for Urban Nature

192. Niech Żyją!

193. NOAH - for animal rights

194. Noé

195. o.z. Karpatská divočina

196. OneKind

197. Österreichische juristische Gesellschaft für Tierschutzrecht (ÖjGT)

198. OTOP

199. Palombar - Associação de Conservação da Natureza e do Património Rural

200. PAN PRO NATURA ANIMALI

201. PETA Deutschland

202. PETA Schweiz

203. Peter Jeffs Holistic

204. Plataforma de Ciência Aberta (Open Science Hub-Portugal)

205. Plataforma loboiberico.pt

206. Pôle Grands Prédateurs

207. Polish Ecological Club in Cracow, Gliwice Chapter

208. PPP-Movement

http://ppp-movement.org

209. Pro Natura - Friends of the Earth Switzerland

210. Pro Natura Piemonte

211. Pro Natura Torino

212. Pro Wildlife

213. Protect ▪ Natur-, Arten- und Landschaftsschutz

214. Protection and Preservation of Natural Environment in Albania

215. Psubraty

216. Puse Latvijas

217. Quercus - Associação Nacional de Conservação da Natureza (Portugal).

218. RENCTAS

219. Rewilding Apennines

220. Rewilding Europe

221. Rewilding France

222. Rewilding Portugal

223. Rewilding Romania

224. Rhinos in Africa

225. Riga Animal Save

226. Robin des Bois

227. ROBIN WOOD

228. ROH - Citisens for the Rivers

229. Romanian Ornithological Society

230. Save Estonia's Forests NGO

231. Save Wild

232. SCOTLAND: The Big Picture

233. SEPANSO Aquitaine

234. Société Herpétologique de France

235. Société nationale de protection de la nature (SNPN, France)

236. Society for Conservation Biology Europe (SCB Europe)

237. Society for Sustainable Living (STUŽ)

238. Society for the Protection of Biodiversity of Thrace

239. Society for the Protection of Prespa

240. Society for the Protection of Wolves

241. SOS Faons NE

242. SOSNA association

243. Společnost pro zvířata/Society for Animals, CZ

244. Społeczny Instytut Ekologiczny

245. Stichting Bont voor Dieren

246. Stichting Fauna4Life

247. Stiftung für das Tier im Recht (TIR)

248. Stowarzyszenie Carpatica

249. Stowarzyszenie dla Natury “Wilk”

250. Svenska Rovdjursföreningen(Swedish Carnivore Association)

251. Svoboda zvířat

252. Swedish society for Nature Conservation

253. TENDUA pour la sauvegarde de la biodiversité

254. Teraz LASY!

255. Terra Anima, društvo za poglobljeno ekologijo
(Society for deep ecology)

256. The European Nature Trust

257. The Green Tank

258. The Irish Wildlife Trust

259. The Lifescape Project

260. The Wildlife Animal Protection Forum South Africa

261. The Wolf Conservation Association

262. Tierschutz Austria

263. Tourism, sports, civic and environmental association Bicycle Tourism Club NAPOCA (CCN)

264. Towarzystwo Przyrodnicze “Bocian” (Wildlife Society STORK)

265. Trees for Life

266. Udruga Prizma

267. Ulvetid

268. Umanotera, The Slovenian Foundation for Sustainable Development

269. Umweltdachverband

270. Unione Bolognese Naturalisti

271. URSIA

272. Verein CHWOLF

273. Vétérinaires Pour la Biodiversité

274. Vogelbescherming Nederland

275. Vogelbescherming Vlaanderen

276. Werkgroep Wolf Nederland

277. Wild Animal Welfare Committee

278. Wild Europe

279. Wild Heritage

280. WildChoices

281. Wildland Research Institute

282. Wildtierschutz Deutschland e.V.

283. Wolfs-Hirten

284. World Animal Protection

285. WWF European Policy Office, on behalf of the European WWF network

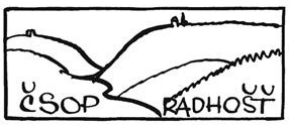
286. Young Greens of Greece)

287. Zelený dům Chrudim

288. Zielone Wiadomości

289. ZO ČSOP Armillaria

290. ZO ČSOP Radhošť



291. Zoo Logical

292. ZOOTĒKA

293. Zveza ekoloških gibanj Slovenije-ZEG