TO: EU Environment Ministers

CC: EU Agriculture Ministers and EU Nature Directors

17th December 2025

## 213 organisations call on Member States not to lower the protection status of the wolf

Dear Minister.

In December 2024, about a year ago, the protection status of wolves under the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) was lowered based on a proposal by the EU. This move has damaged the EU's reputation as a global champion for conservation. Indeed, this politically motivated and unscientific U-turn on wolf protection was widely criticised by scientists, conservation experts and environmental organisations alike.

The science, however, is clear: while wolf populations have been recovering in some EU countries largely due to their strict protection, the **species still has an unfavourable conservation status in six out of seven EU biogeographical regions** (data from the HD Art. 17 reporting period 2013-2018). The Large Carnivore Initiative for Europe had <u>raised serious concerns</u> about the proposal to downlist the wolf under the Bern Convention as it "does not appear warranted" and as decisions on the conservation and management of wildlife should be "based on sound science, not (just) on political reasons".

Despite this situation, the EU has amended its flagship Habitats Directive by moving the wolf from Annex IV (strictly protected) to Annex V (protected). EU Member States have until 15<sup>th</sup> January 2027 to transpose this targeted amendment into national law, but can also decide not to lower the protection status of the species on their territory. We would also like to draw your attention to two ongoing court cases regarding the decision on the wolf's protection status<sup>1</sup>, and emphasise that an informed decision could only be made based on their outcomes.

With this letter, the undersigned civil society organisations call on you and your government to not lower the protection status of the wolf in your national territory and to intensify efforts to achieve coexistence between wolves and rural communities.

Despite the recent change in EU legislation, the Commission confirmed the possibility for Member States to maintain a higher protection status of the wolf, provided that this is signalled at the time of the notification of their transposition measures. In addition, the amendment to the Habitats Directive does not affect Member States' obligation to achieve and maintain a favourable conservation status of the species. Indeed, it is essential that each country takes the necessary steps to fulfil this requirement.

On 12<sup>th</sup> June 2025, the European Court of Justice <u>reaffirmed</u> that the conservation status of a protected species must be assessed and achieved in each individual country rather than across larger, cross-border regions. In addition, economic, social and cultural requirements as well as regional and local

<sup>&</sup>lt;sup>1</sup> Member States should take notice of two ongoing court cases that have been brought before the European Court of Justice and are currently awaiting a decision: <u>Case T-634/24</u> (Green Impact and Others v Council and Commission) from 6 December 2024 seeks to annul the 2024 EU Council Decision on the EU's submission of a proposal for the downgrade of the wolf protection status under the Bern Convention. <u>Case T-563/25</u> (Green Impact and Others v Parliament and Others) from 15 August 2025 seeks to annul Directive (EU) 2025/1237 amending the Habitats Directive by downgrading the protection status of the wolf.

characteristics may be taken into account, but cannot by themselves justify classifying a species' conservation status as favourable.

It is therefore crucial that the **reporting on the conservation status of habitats and species under the Habitats Directive is based solely on proper robust scientific data**, gathered through sound and harmonised methodologies. Most importantly, the data has not yet been analysed by the European Environment Agency to establish the status of populations at regional level. No decision to transpose the downgrade of the protection status and/or actively manage wolf populations should be taken before transparent, updated and science-based population data confirms that such decisions would not threaten the long-term survival of populations. We are committed to contributing to the upcoming public consultation on the data for the new reporting cycle and remain available to provide Member States with adequate support for the proper monitoring of wolf populations.

Further to the above, we have observed that downgrading the protection status of the wolf also undermines existing efforts to support co-existence between wolves and local communities, as it fosters the false perception that hunting wolves is a solution to livestock depredation. Decades of acquired knowledge should not be overshadowed by political debates surrounding hunting. Scientific evidence shows that a comprehensive strategy for coexistence between humans and large carnivores is essential to effectively mitigate conflicts and promote long-term conservation. The proper management of (extensively) farmed animals, and the adoption of preventive measures are the most rational, effective, and socially acceptable method to prevent depredation.

Compensation schemes can enhance tolerance as long as they are conditional on responsible livestock practices, to remain fair and sustainable. Central to this coexistence strategy is the active engagement of stakeholders - particularly farmers - who must have access to reliable information and technical support, provided by public institutions and experienced professionals. Decision-making processes should be transparent and grounded in scientific evidence, ethical principles, and legal obligations.

Ultimately, the protection of large carnivores must evolve toward an innovative model that integrates prevention, conditional compensation, stakeholder involvement, and science-based governance, supported by public awareness and educational initiatives.

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.

For the reasons outlined above, the undersigned organisations strongly urge you not to lower the protection status of the wolf on your territory and to ensure that measures are put in place to foster coexistence.

Yours sincerely,

Patrick ten Brink, Secretary General, European Environmental Bureau, on behalf of the undersigned organisations (see full list below)















































































































































































































































































































































































































































- 1. AAP Animal Advocacy and Protection
- 2. Acción Océanos
- 3. Aegean Wildlife Hospital
- 4. Agent Green
- 5. ANIMA
- 6. Animal Protection Denmark
- 7. ARCHELON The Sea Turtle Protection Society of Greece
- 8. ARION-CETACEAN RESCUE AND REHABILITATION RESEARCH CENTER
- 9. Asociación Animalista LIBERA!
- 10. ASPAS Association pour la protection des animaux sauvages
- 11. Association Carduelis
- 12. Association Milvus Group
- 13. Association Ulvetid
- 14. Associazione "Vivere in Valdisieve"
- 15. Associazione CERM Centro Rapaci Minacciati ODV
- 16. Atto Primo Salute Ambiente Cultura ODV
- 17. Averti Ecologie BV
- 18. AVES FRANCE
- 19. Biofuelwatch
- 20. Biologiforbundet
- 21. BirdLife Cyprus
- 22. BirdLife Finland
- 23. Born Free Foundation
- **24. BUND**
- 25. CALLISTO, Wildlife and Nature Conservation Society
- 26. Canopea
- 27. CATCA Environmental and Willdife Society
- 28. CEEWeb for Biodiversity
- 29. Center for Environment
- 30. Centre4NI
- 31. CHWOLF Association
- 32. Clean Air Action Group
- 33. ClientEarth
- 34. Coalizione TESS Transizione Energetica Senza Speculazione
- 35. Code animal
- 36. Comitato Crinali Liberi Londa
- 37. Comite Schone Lucht
- 38. Conservation Collective
- 39. Cosmofauna aps
- 40. CPN BRABANT
- 41. Danish Society for Nature Conservation
- 42. Dansk Botanisk Forening
- 43. David Shepherd Wildlife Foundation
- 44. DEPANA
- 45. Děti Země (Children of the Earth)
- 46. Deutsche Juristische Gesellschaft für Tierschutzrecht e.V. (DJGT)
- 47. Deutsche Umwelthilfe e.V.
- 48. Deutscher Tierschutzbund e.V.

- 49. DIer&Recht
- 50. Djurskyddet Sverige
- 51. DOF BirdLife
- 52. Društvo Dinaricum
- 53. Earth Ethics, Inc.
- 54. Ecoflix Foundation
- 55. Ecological Alliance
- 56. ECOLOGICAL RECYCLING SOCIETY
- 57. Ecologistes en Acció de Catalunya
- 58. ECO-TIRAS
- 59. Education Ethique Animale
- 60. ENPA Odv
- 61. Environment East Gippsland inc
- 62. Environmental Pillar
- 63. Eurogroup for Animals
- 64. EuroNatur
- 65. European Environmental Bureau
- 66. FAADA
- 67. Faia Brava Associação de Conservação da Natureza
- 68. Fauna4Life
- 69. Federazione Nazionale Pro Natura
- 70. FERUS
- 71. Focale pour le sauvage
- 72. Focus Association for Sustainable Development
- 73. Fondation Brigitte Bardot
- 74. Fondation Franz Weber
- 75. Fondation Miaou & Co.
- 76. Fondation pour la recherche sur la biodiversité
- 77. Fondazione Capellino
- 78. Fondo Para la Protección del Lobo Ibérico
- 79. Forest of the World
- 80. Forests Now
- 81. France Nature Environnement
- 82. French chapter of the global youth biodiversity network, le réseau mondial des jeunes pour la biodiversité
- 83. French Mammalogy Society (SFEPM)
- 84. Freundeskreis freilebender Wölfe e.V.
- 85. Friends of the Earth Europe
- 86. Fundacja Psubraty
- 87. Fundația Eco-Civica
- 88. Gaia Animali & Ambiente OdV
- 89. Gallifrey Foundation
- 90. Geological Society of Denmark
- 91. Gordon Wildlife Alliance
- 92. Green Impact
- 93. Gruppo d'Intervento Giuridico (GrIG)
- 94. GYBN Europe
- 95. Hellenic Animal Welfare Federation

96. Hellenic Ornithological Society 97. Hellenic Society for the Protection of Nature (HSPN) 98. Highlands & Islands Environment Foundation (HIEF) 99. Himalayan Wolves Project 100. Hnutí DUHA Šelmy 101. **Humane World for Animals** 102. IG WILD BEIM WILD 103. In Defense of Animals 104. Initiative für die Natur e.V. 105. Institute of Circular Economy (INCIEN) 106. INTERCIDS Operadores juridicos por los animales International Fund for Animal Welfare (Ifaw) 107. 108. **Intimate With Nature Society** 109. iSea 110. Kemeri National Park Fund 111. Komitee gegen den Vogelmord e.V. (CABS) 112. LAV - Lega Anti Vivisezione 113. Law of the Wild 114. Leal Lega Antivivisezionista 115. Legambiente 116. Lesoochranárske zoskupenie VLK/ WOLF Forest Protection Movement 117. Lique pour la Protection des Oiseaux / BirdLife France 118. Lipensko pro zivot, z.s. 119. Luchs- und Wolfsschutz Bayerischer Wald 120. Luontoliiton susiryhmä / The Wolf Action Group 121. Mammal Research Institute of the Polish Academy of Sciences 122. **MEDASSET** 123. MedINA (Mediterranean Institute for Nature and Anthropos) 124. Menorca Preservation 125. Merman Conservation Expeditions Ltd 126. MOm 127. Morigenos - Slovenian Marine Mammal Society 128. Mouvement Ecologique - Friends of the Earth Luxembourg 129. **NABU** 130. NABU Berlin 131. **NABU Germany** 132. NABU Heidekreis e.V. 133. NABU Landesverband Hessen 134. Nadace na ochranu zvířat 135. Nagy Tavak és Vizes Élőhelyek Szövetsége 136. Natagora 137. natur&ëmwelt a.s.b.l. 138. Natura 2000 Coalition 139. Naturefriends Greece 140. Natuurmonumenten 141. Naturschutzinitiative 142. Naturschutzbund Österreich/Austrian league for nature conservation 143. Natuurpunt

Naxos Wildlife Protection
NESEHNUTÍ
OBRAZ - Obránci zvířat
OIPA
ONDA Organismo Nazionale Difesa Alberi
One Voice
OneKind
Palombar - Conservação da Natureza e do Património Rural
Panhellenic Animal Welfare and Environment Federation
Parents for Future - gruppo locale Melegnano
Parents for Future Milano
Peter Jeffs Holistic
PIC - Legal Center for the Protection oh Human Rights and the Environment
Pôle Grands Prédateurs
Polish Society for the Protection of Birds (OTOP)
Pro Natura Firenze ETS
Pro Natura Friends of the Earth Switzerland
Pro Wildlife
Protect • Natur-, Arten- und Landschaftsschutz e.V.
Protection and Preservation of Natural Environment in Albania
Puse Latvijas
reLife Earth
Rewilding Academy
Rewilding Europe
Romanian Environmental Partnership Foundation (Fundatia pentru Parteneriat))
RSPCA
Salviamo gli Orsi della Luna APS
Salviamo le Apuane
SAVE WILD
SEPANSO Aquitaine
Slovene dragonfly society
Slovenian Alliance of non-government organisations for the protection of animals
Società Cooperativa Sociale Eliante Onlus
Société nationale de protection de la nature (France)
Society for Ecological Restoration Europe
Society for the Protection of Biodiversity of Thrace
Society for the Protection of Prespa
SOSNA
SPEA - Portugal
Společnost pro zvířata/Society for Animals, CZ
Spolek Ametyst
Stowarzyszenie Pracownia na rzecz Wszystkich Istot
Suomen Luonnonsuojeluliitto
Svoboda zvířat
Terra Cypria- The Cyprus Conservation Foundation
The European Institute for Animal Law & Policy
The European Nature Trust
The Lifescape Project

192.	The Swedish Association for the Protection of Animals
193.	The Wolf Conservation Association
194.	Tierschutz Austria (Wiener Tierschutzverein)
195.	Tutela Fauna Toscana
196.	Umanotera
197.	Un euro per salvare i nostri boschi
198.	Ursia o.z.
199.	Ústecké šrouby, z. s.
200.	Varkens in Nood
201.	Vilda Djurens Skydd
202.	Vogelbescherming Vlaanderen vzw
203.	VšĮ "Žiedinė ekonomika"
204.	WeHowl
205.	Werkgroep Wolf Nederland
206.	WildChoices
207.	Wildlife for All
208.	Wildtierschutz Deutschland e.V.
209.	Wolfs-Hirten
210.	WWF European Policy Office, on behalf of the European WWF network
211.	Yoga i det grønne
212.	Youth and Environment Europe (YEE)
213.	NEOI ΠΡΑΣΙΝΟΙ - NEOI PRASINOI