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Director of the Directorate-General for Environment
Mr Humberto Delgado Rosa
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BELGIUM
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Berlin, 1 February 2024

Dear Director,

In the context of the European Commission stakeholder consultation on wolf population data in Europe and the in-depth analysis on the situation of the wolf published on 20 December 2023, the undersigned associations are unanimously convinced that the current problems of grazing livestock with the spread of the wolf cannot be solved with herd protection measures alone.

The steadily increasing trend of growing wolf populations in Europe demonstrates the high adaptability of this animal species in various habitats. The return of the large carnivore has led to a surge of incidences of damage, particularly to livestock, in regions where wolves have become resident. The practical experience in recent years has shown that passive herd protection in the form of fences and guard dogs has its limits, as wolves learn incredibly fast to bypass them. Furthermore, some areas only can maintain and promote biodiversity if grazing animals are there. Natural conditions like mountains make it close to impossible to install herd protection, as these areas are difficult to access. An additional disadvantage is the separation of habitats by fences.

The acceptance of large carnivores in rural areas declines if there is an increasing incidence of attacks. The additional request of society and politics to accept these attacks and react with more efforts in case of herd protection, reaches the limits of acceptance for the inhabitants of rural areas.

Dear Director, the aim of wolf population management is not the extermination of an animal species. Local population management of individual carnivores would minimise damage to livestock and farms and would ensure coexistence between rural population and large carnivores.

Please find enclosed our position paper on the current situation of the wolf in Europe.
With this joint initiative we address the ongoing challenges with the increasing number of wolves to all political stakeholders at local, national, and European level.

Respectfully yours,

Bernhard Krüsken

General Secretary
Germany
German Farmers' Association

Wiktor Szmulewicz

President
Poland
National Council of Agricultural Chambers

Palle Borgström

President
Sweden
Federation of Swedish Farmers

Juha Marttila

President
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The Central Union of Agricultural Producers and Forest Owners MTK

Thor Gunnar Kofoed

Vice President
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Danish Agriculture and Food Council F.m.b.a.

Gintare Kisieliene

Leader
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Lithuanian Sheep Breeders' Association

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President
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Guntis Gūtmanis

Chairman of the Board
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Leo Tiefenthaler

President
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Südtiroler Bauernbund

Maira Dzelzkalēja-Burmistre

Vice-Chair
Latvia
Farmers Parliament

Bernard Mogenet

President
France
Departmental Federation of Farmers' Unions of Savoie

Lode Ceyssens

Chairman
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Roman Žveglič

President
Slovenia
Chamber of Agriculture and Forestry of Slovenia

Hans Van den Heuvel

General Director
Netherlands
LTO

Annex

Demands from Farmers' Organisations

Regulation of wolves creates coexistence in rural areas

The demands of the Farmers Organisations
30. January 2024

Wolves have increasingly shown how adaptable they are within the EU in the recent years. This is a great success for nature conservation. But the return of the wolf also brings enormous challenges - especially for the owners of sheep, goats, horses, cattle and wild animals Especially in rural areas, grazing animal owners demand that protection of livestock has to be prioritised over the growing population of the wolf. Currently, there are no solutions in sight to alleviate the threat of wolf attacks. Hence, we call on politicians to act now.

Motion for a resolution 2022 and in-depth analysis 2023

We support the Motion for a Resolution of the European Parliament from November 2022 that called on the Expert group on the BIRDS and habitats directives (NADEG) to become active by the end of April last year and requested data on wolf populations, killed animals, etc. from each Member State. The results of the data analysis was published at the end of 2023. The so-called in-depth analysis was published by the EU Commission with the proposal to lower the protection status of the wolf in the Bern Convention. The European Member States will first decide on the Commission's proposal in the European Council and, if adopted, it will be submitted to the Standing Committee of the Bern Convention. The EU Commission's rethink is an important signal for rural areas and is to be welcomed in principle, but must not distract from utilising the existing possibilities of European law to regulate wolves.

Legal framework

On the one hand, the existing derogations of European nature conservation law must be used consistently, and on the other hand, it must also be possible to change the protection status of a species that is no longer endangered. The EU nature conservation law does not provide a mechanism for the case of a positive conservation status of previously endangered species. The reclassification of a species from Annex IV to V requires unanimity among the member states - which is hard to get on the European Level with 27 Member States. A change to the European requirements for a reclassification of a species is therefore necessary, as unanimity is hard to reach.

Wolf population development and European monitoring

Wolves are a very adaptable species and can cover long distances over a short period of time in search of new territories and/or prey. This high mobility of wolves is one factor for the good development of population and expand to several countries in recent years. According to official figures of the Scientific Advisory Board of the Bern Convention, based on the best available data, the total number of wolves is likely to be in the order of 19.000 animals in 2022 and is thus classified as least threatened at EU-27 level. This count of wolves confirms the result of the European Commission's in-depth analysis from last year, according to which at least around 20.300 animals can currently be expected in Europe. However, the assessment of conservation status is divided by countries and their biogeographical regions. This leads to the false impression in the respective Member States that the wolf population is not in a good conservation status. Despite the same reporting form for monitoring data to the EU Commission, there is no cross-national assessment of these monitoring data. The Scientific Advisory Board claims that the quantity and quality of the data seems to vary greatly between the European Member States. It is incomprehensible that despite good research findings and their development in recent years, it has not been possible to establish a transnational monitoring for wolves. A first important step at this point would be the joint consideration and assessment of existing monitoring data and their respective biogeographical regions.

Commonalities in European monitoring

The quantitative recording of monitoring data, such as sampling of excrements, cracks or pictures of photo-traps, does not differ within the EU. There are also already commonalities in the qualitative assessment for the verification of monitoring data. The so-called SCALP criteria are used in Denmark, France, Lithuania, Latvia, the Netherlands, Austria, Belgium and Germany, among others. These commonalities show that Europe could already be much further along in a common evaluation of monitoring data than we are today. The SCALP criteria categorisations have been developed in the framework of the project “Status and Conservation of the Alpine Lynx Population” (SCALP) for the transnational lynx monitoring in the Alps. These SCALP criteria have been adapted also to wolves.

The demands of the named Farmers Organisations all over Europe for wolf population management:

1. Recognition by the EU Commission that the original division of wolves into 9 populations fits no longer the current state of science, as wolves have spread across the European landscape and different populations are in genetic exchange.
2. Acknowledgement of the challenges for the implementation of herd protection measures and limits of acceptance of local wolf populations in rural areas.
3. Consistent implementation of the removal of wolves after attacking grazing animals all year round. Removal largely refers to problem wolves and packs that repeatedly prey on grazing animals or show problematic behaviour towards humans. In the case of problematic packs, removing them completely should be considered.
4. Following the Commission by the Member States to its proposal to lower the protection status in the Bern Convention
5. Reclassification of the wolf from Appendix IV to Appendix V of the Habitats Directive at pan-European level.
6. Change of the European requirements according to Article 19 of the Habitats Directive in case of a reclassification of species in Appendix IV to Appendix V.
7. More flexibility and individual instruments to manage wolves are necessary for the Member States. As one example, some countries in the EU have already divided their country into different management areas. Other countries manage wolves over a quote and defence shoots on herds, which are still attacking by wolves. Existing and well-functioning management systems should not be renewed, but should be maintained. No matter which option the countries choose: grazing animals should always have priority.
8. Immediate introduction of transnational monitoring and assessment of the wolf population, as sufficient expert knowledge is available following many years of research.
9. No isolated consideration of wolf populations by country plus the breakdown by biogeographical region, because wolves know no borders.
10. Additonal funding for prevention measures and compensation outside the Common Agricultural Policy (CAP).

Monitoring methods used in the different Member States

Country	Tracking	Howl animation	Search of urine/feces/hair	Genetic analysis	Photo trap	Statements from persons	Telemtry	Analysis of shooting data	Analysis of killed animals	Autopsy of dead wolves
DK	X	?	X	X	X	X	?	0	X	X
EST	X	X	X	X	X	X	X	X	X	?
FRA	0	X	X	X	X	X	?	0	X	X
LTU	X	X	X	X	X	X	0	X	X	X
NL	X	0	X	X	X	X	X	X	X	X
POL	0	0	X	X	0	X	0	0	X	X
SWE	X	0	X	X	X	X	X	X	X	X
FIN	X	0	X	X	X	X	0	X	0	X
AUT	0	0	X	X	X	0	0	X	0	X
BEL	0	?	X	X	X	X	?	0	X	X
GER	X	X	X	X	X	X	X	X	X	X
LVA	X	X	X	X	X	X	0	X	X	X

Framework conditions for national monitoring

Country	Quantitative representation of wolf numbers	Use of the SCALP criteria	Individual detection or stratified monitoring	Need for annual proof	Transnational monitoring	Contact between neighbouring environment ministries
DK	Individuals as well as pairs, pups, territorial individuals and non-territorial individuals	Yes	Individual detection	Yes	Close collaboration with Germany	Close collaboration with Germany
EST	Individuals	No	Individual detection	Yes	No	Yes
FRA	Individuals	Yes	Individual detection	Population re-estimated each year	Exchange with Switzerland, but nor real transnational monitoring	
LIT	The number of animals is presented in packs.	Yes	Stratified monitoring	Yes	No	Yes
NL	Individuals as well as packs, pairs, territorial individuals, territories, pups, and reproducing territories	Yes	Individual detection	Yes	No	Germany and Poland
POL	Individuals in the biogeographical regions	No	Monitoring in selected plots (800-1800 km2) an extrapolation range of distribution	No	No	
SWE	Number of packs multiplied by 10, territorial pairs and individuals	No	Individual detection	Yes	Norway	Norway and Finland
FIN	Individuals, packs and pairs	No	Individual detection	Yes	No	Finland and Sweden
AUT	Individuals and packs	Yes	Individual detection	Yes	No	No
BEL	Packs and non-territorial individuals	Yes		Yes	No	No
GER	Packs, pairs, territorial individuals, pups, territories and reproductive territories	Yes	Individual detection	Yes	No	
LV	Individuals	Yes	Individual detection as part of game inventory	Yes	No	Yes