

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

By email: [Ursula.VON-DER-LEYEN@ec.europa.eu](mailto: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 <sup>1</sup>.

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 4<sup>th</sup> September 2023, which included misleading information regarding wolves. Our concerns about this were outlined to you in our letter dated 11 September 2023<sup>2</sup>.

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<sup>3</sup>.

**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.

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

<sup>2</sup> 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>)

<sup>3</sup> 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



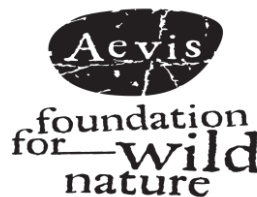
2. Associazione Italiana per l'Ambiente  
la Cultura  
le Emergenze



3. Aegean Wildlife Hospital



4. Aegis Foundation



5. African Conservation Foundation



6. AG Wildtiere



AG Wildtiere

7. Agent Green



8. Aktionsgemeinschaft Artenschutz



9. ALAMBI - Associação para o Estudo e Defesa do 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



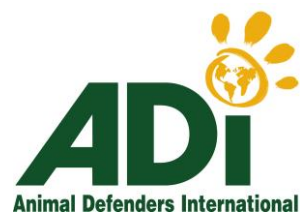
19. Animal Action Greece



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 Montevoglio 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 Žalio"



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 Ecosistema



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



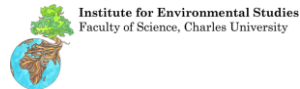
148. IG Berner Wald



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. Kemeru National Park Fund



156.    Landschappen 
157.    Latvian Ornithological Society 
158.    Latvijas ainavas Wildlife NGO, LATVIA
159.    Lesochranárske 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



**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&emwelt 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. OTOPI



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. RENTAS



219. Rewilding Apennines



220. Rewilding Europe



221. Rewilding France



222. Rewilding Portugal



223. Rewilding Romania



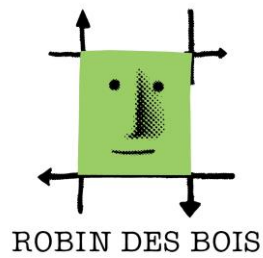
224. Rhinos in Africa



225. Riga Animal Save



226. Robin des Bois



227. ROBIN WOOD



228. ROH - Citizens 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

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. ZOOTEKA



293. Zveza ekoloških gibanj Slovenije-ZEG



