

31 January 2025

**Joint NGOs Open Letter on Wolves:
Reverse the unjustified wolf protection downgrade at the Bern Convention**

To the attention of:

Contracting Parties of the Bern Convention on the Conservation of European Wildlife and Natural Habitats as well as Delegates

For information:

Secretary General of Council of Europe, President of the Assembly of the Council of Europe,
Secretary of the Bern Convention, as well as Bureau and Standing Committee

Ms Jessica Roswall, European Commissioner for the Environment, Water and Circular Economy

Ms Florika Fink-Hooijer Director -General DG Environment (European Commission) and relevant Officials

EU Ombudsman

Subject: act by 2 March 2025 to reverse the unjustified wolf protection downgrade.

The 2024 Decision to downgrade wolf protection, lacking scientific basis, must be reversed. The Bern Convention must maintain independence from EU political influence. Speed-up of a systemic Reform is essential in relation to prior scientific review of Parties' proposals, addressing the Convention's absence of an internal assessment process and safeguarding its credibility. The European Scientific Community recommended against the wolf downlisting.

Dear Contracting Parties of the Bern Convention,

the recent decision to downgrade the protection status of wolves (*Canis lupus*) under the Bern Convention from "strictly protected" (Appendix II) to "protected" (Appendix III) only, based upon a Proposal of the European Union, was adopted on 3 December 2024 by the Standing Committee.

As pointed out by hundreds of scientists and academics across Europe and worldwide^{1 2} as well as by the Large Carnivore Initiative for Europe (LCIE)³, this decision lacks scientific justification, undermines decades of conservation efforts and sets a dangerous precedent for wildlife protection across Europe. The European Scientific Community therefore recommended the Standing Committee of Bern Convention to prohibit a vote on the Proposal or to vote against it, because of the lack of adequate scientific backing. The EU proposal relied on a non-peer-reviewed report produced by a consultancy, commissioned and funded for by the European Commission. The scientific evidence produced by the Scientific Community countered the Commission and EU Council's claims that a downlisting was necessary. Ignoring such expert recommendations not only has jeopardised wolf

¹ https://www.greenimpact.it/wp-content/uploads/2024/11/VERSIONE-29-11_Open-Letter-26-November-2024_compressed.pdf

² <https://drive.google.com/drive/folders/13Y4fuG3OpUKY7Wtw9Y2dMbfpBVeGuyMy>

³ https://lciepub.nina.no/pdf/638670498186284408_LCIE%20-%20statement%20on%20wolf%20downlisting%20proposal.pdf

populations but has also undermined the integrity of science-based decision making, which should be the basis of any proposal for changes to the Convention.

The process that led to the adoption of this decision also revealed that the Bern Convention does not apply a prior internal scientific scrutiny of Parties' proposals before putting them through a vote. Furthermore, the European Commission's expedited approach to this reclassification has bypassed standard procedural safeguards. By circumventing the usual 60-day period for objections to a EU proposal to the Bern Convention and limiting opportunities for annulment appeals, the EU has disregarded the fundamental democratic principles that underpin environmental governance. This hasty action has effectively silenced the voices of numerous non-governmental organizations (NGOs)⁴ and concerned citizens⁵ who have long and vigorously opposed the downgrading of the wolf's protection status⁶.

However, an opportunity exists to rectify this situation and to regain the credibility of the Bern Convention and your own policies. We urge you to secure long standing scientific-based conservation policies in Europe and urgently take the following steps:

1. **Urgent: Withdraw Support of the December 2024 Decision to downgrade wolf protection:** considering the above, reverse any position favouring the downgrading of wolf protection under the Bern Convention, and communicate your objection to the Bern Convention Secretariat by March 02, 2025. If there are at least 17 Objections, the Decision will not enter into force.
2. **Support and speed-up a process to Reform the Bern Convention to make it credible again: support a review of the internal decision-making process to protect its independence, integrity and legitimacy as the cornerstone European Convention for the conservation of species and habitats.** Each proposal to amend any element of the Bern Convention must go through a transparent, robust, and independent scientific review process to assess its legitimacy and scientific underpinning prior to being put to vote. The Bern Convention Secretariat must have the autonomy to decide not to put a proposal for vote if it lacks solid scientific justification. This is a duty and a requirement for the Bern Convention, if it is to maintain its credibility as an international Convention, even more so now that the Convention is asking for a mandatory economic contribution from all its Parties – if not, its added value and its legitimacy would be highly questionable.
3. **Uphold Democratic Processes:** Ensure that all Decisions regarding changes to the Bern Convention undergo transparent, inclusive, and democratic procedures, allowing adequate time for public consultation and appeals. By voting as a block, the EU not only has the majority of votes in the Bern Convention, but it can also silence the opinion of EU States that would have objected to the EU Proposal in the Bern process (such as Spain and Ireland in this case). No Member to the Bern Convention should be allowed to push its own proposal, especially when it is driven by purely politically motives and lacks scientific backing.

The Decision to downgrade the protection status of wolves, based on lack of science, represents a significant setback for conservation and democratic processes in Europe. It contravenes established processes, lacks scientific justification, and poses a direct threat to biodiversity. It also goes against the basic principles of the Bern Convention itself, that, as stated in its Preamble, recognises the intrinsic

⁴ December 2023: <https://www.wwf.eu/?12540466/Nearly-300-NGOs-support-wolf-protection-in-open-letter-to-President-von-der-Leven>, September 2024 https://dl1jyxxz9imt9yb.cloudfront.net/resource/1709/attachment/regular/Protect_Wolves_Statement.pdf

⁵ https://secure.avaaz.org/campaign/en/stop_wolf_hunting_loc/?copy;_Survey:_wolves_should_be_strictly_protected,_majority_of_rural_inhabitants_say|Eurogroup_for_Animals

⁶ It should also be noted that the majority of respondents-more than 70% -to the consultation process launched by the European Commission in September 2023 demanded to maintain strict protection for the wolves. <https://op.europa.eu/en/publication-detail/-/publication/5d017e4e-9efc-11ee-b164-01aa75ed71a1/language-en>

value and rights to life of wild flora and fauna, which needs to be preserved and passed to future generations.

The Bern Convention is funded by European citizens, yet the Convention has not established transparent and credible processes for public scrutiny. The wolf downgrade has clearly demonstrated that it is too simple to withdraw needed protection to an apex species under the Bern Convention due only to EU politics when civil society at large and the European scientific community have demanded the opposite.

We look forward to learning what actions you intend to take on this very important matter.

Yours sincerely,

the undersigned 76 organisations:

contact for further correspondence on this Letter:

Gaia Angelini
gaia.angelini@greenimpact.it
 Mobile: +39 -3480586408

ORGANISATION	COUNTRY	LOGO
Green Impact	Italy	
CHWOLF	Switzerland	
Federazione Nazionale Pro Natura	Italy	
Great Lakes and Wetlands Association	Hungary	
One Voice	France	

Wild Wonders Foundation	Sweden	
Freundeskreis freilebender Wölfe e. V	Germany	
The Swedish Carnivore Association	Sweden	
Lega italiana per la Difesa degli Animali e dell'Ambiente	Italy	
Wildtierschutz Schweiz association	Switzerland	 Suisse de conservation de la faune sauvage Svizzera conservazione della fauna selvatica Proteccziun diis animals selvadis Svizra
LNDC Animal Protection	Italy	
European Bioeconomy Bureau	Belgium	
The International Conservation & Biodiversity Team (ICBT)	France	
EARTH OdV	Italy	
Averti Ecologie BV	The Netherlands	
Focale for the Sauvage	France	

Earth Thrive	United Kingdom	
EcoJust	The Netherlands	
Wildtierschutz Deutschland e.V.,	Germany	
Pôle Grands Prédateurs	France	
Earth League International	United States	
Avenir Loup Lynx Jura ALLJ	Switzerland	
Animal Cross	France	
Vogelbescherming Vlaanderen	Belgium	
Tierschutz Austria (Wiener Tierschutzverein)	Austria	
Deutsche Umwelthilfe e.V.	Germany	
Studio Wolverine	The Netherlands	

Naturschutzinitiative e.V.	Germany	
Wildland Research Institute	United Kingdom	
Io non ho paura del lupo	Italy	
Rewilding Europe	The Netherlands	
National Park Rescue	United Kingdom	
BUND Naturschutz in Bayern e. V.	Germany	
Extinction Rebellion Serbia	Serbia	
Protect ▪ Natur-, Arten-und Landschaftsschutz e. V.	Germany	
Protect ▪ Natur-, Arten-und Landschaftsschutz	Austria	
Mammal Research Institute Polish Academy of Sciences	Poland	

White Heron 1165	Serbia	
Rewilding Portugal	Portugal	
ASPAS	France	
Gallifrey Foundation	Switzerland	
Gesellschaft zum Schutz der Wölfe e.V.	Germany	
ASCEL	Spain	
Alleanza Antispecista	Italy	

Animal Aid Italia	Italy	
Attivisti Gruppo Randagio	Italy	
Associazione Vittime della caccia	Italy	
Bearsandothers ODV	Italy	
Centro Parchi – l'Università dei Parchi	Italy	
Centro Studi Ecologici Appenninici	Italy	
CABS Bird Guard	Italy	
Federazione Rinascita Forestale Ambientale	Italy	
Gabbie Vuote Firenze	Italy	

Italia Horse Protection	Italy	
Italian WildWolf	Italy	
Lega Italiana Diritti Animali Ortona	Italy	
LIMAV Lega Internazionale Abolizione vivisezione	Italy	
Pro Natura Firenze	Italy	
Reseda Onlus	Italy	
Società Italiana Medicina Forestale	Italy	
Rewilding Academy	The Netherlands	
Conservation Collective	United Kingdom	
Alianța pentru Combaterea Abuzurilor	Romania	

France Nature Environnement	France	
FERUS	France	
Djurens Ö	Sweden	
Devon Environment Foundation	United Kingdom	
European Alliance For Wolf Conservation	Belgium	
Lifescape	United Kingdom	
Friends of the Earth CZ - Carnivore Conservation Programme	Czech Republic	
FNE AuRA	France	
World Animal Protection Sverige	Sweden	 Sverige

Fauna & Flora Saving Nature Together	United Kingdom	
Luontoliiton susiryhmä -The Wolf Action Group	Finland	
Environmental Pillar	Ireland	
Balkani Wildlife Society	Bulgaria	