

31 January 2025

## Joint NGOs Open Letter on the Killing of Wolves in Sweden

### To the attention of:

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

Mr Michael McGrath, European Commissioner for Justice and Rule of Law.

### For information:

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

Swedish Authorities

EU Ombudsman

Interested Members of the European Parliament

**Time to Act:** The European Commission must initiate an infringement procedure against Sweden for the illegal killing of wolves in 2025 and precedent years. Additionally, the incorrect transposition of the EU Habitats Directive into Swedish national law in reference to ‘strict protection’ and ‘favorable conservation status’ must be addressed without delay together with the systemic failure of the Swedish judicial system to ask for a preliminary interpretation of the national law to the European Court of Justice. It is striking that the European Commission is continuously ignoring the deliberate killing of an endangered population, strictly protected by EU law, making ‘tolerance’ of bad implementation and violation of EU law ‘the rule’, instead of the exception.

Dear Commissioners,

as you are undoubtedly aware, the illegal killing of wolves - a species that remains strictly protected under EU law—continues unabated in Sweden. We urgently call on you to take swift action by opening an infringement procedure to ensure the following:

1. **Halt further killings immediately.**
2. **Secure the correct transposition of the EU Habitats Directive into Swedish national law**, as it currently appears inconsistent with EU legislation in some respect.
3. **Take the case to the European Court of Justice.**
4. **Sanction Sweden for the deliberate killing of protected individuals**, which gravely endangers the survival of Sweden's wolf population, thereby harming European wolf populations as a whole and impacting the interests of EU citizens.

Despite the widely recognized legal and scientific objections to such culling, and the global attention this issue has garnered, the European Commission has so far refrained from taking any decisive action. We therefore request clarification on the Commission’s intentions regarding this matter. **For your convenience, we have included a *brief overview of the topic in Appendix I below, along with further reading material.***

The Swedish case is straightforward: the wolf (*Canis lupus*) in Sweden is listed as ‘**Endangered**’ under the IUCN Red List and this translates into a prohibition to kill it under EU Law. Each individual wolf in Sweden

is strictly protected and killing should be prosecuted by administrative and criminal laws, - which has not happened so far – thus for also undermining the credibility and legitimacy of Swedish and European legal institutions.

We would like to remind you that the process of downlisting wolves at the Bern Convention, proposed last year by the European Commission and voted at the Standing Committee of the Bern Convention in December 2024, is still under scrutiny. It is currently possible that 17 Parties to the Bern Convention may reverse the decision taken last December; a case for annulment of the EU Council decision has been submitted before the European Court of Justice by a few associations<sup>1</sup>; a case against the European Commission for the Proposal to downlist wolves has been submitted by the organization ClientEarth and accepted for evaluation by the EU Ombudsman<sup>2</sup>. Originated by the Bern Convention, the EU legislation on Habitat and Species Conservation is a science-based law. Yet, the LCIE, IUCN, nearly 700 European scientists and dozens of national scientific initiatives have produced statements saying that the Proposal of the Commission and subsequent decisions to downlist wolf protection are against science and therefore purely based on ‘political’ convenience- EU institutions and Member States must not bypass solid scientific scrutiny with politics.

You have the possibility to correct the missteps of your institution by securing correct implementation of the Habitats Directive within Member States - including strict protection of wolves and also by opening the clearly needed infringement procedure against Sweden. It is now widely known that the EU Proposal to the Bern Convention, based on a European Commission Proposal, has no science back -up since it is based on a non-peer-reviewed report issued by a consultancy under a service contract of EC DG Environment, this is why it could possibly be reversed within the context of the Bern Convention and anyway be unapplicable in the EU context.

✓ **Please find further information in Annex I (below the signatures)**

**We look forward to learning what actions you intend to take on matter of the killing of wolves in Sweden whose population belongs to the EU and EU citizens.**

Yours sincerely

**the undersigned 73 organisations**

for further correspondence on this Letter:

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ORGANISATION	COUNTRY	LOGO
Green Impact	Italy	
CHWOLF	Switzerland	

<sup>1</sup> <https://www.greenimpact.it/wp-content/uploads/2024/12/PR.-Wolves-and-ECJ.-17-December.-EN.pdf>

<sup>2</sup> <https://www.ombudsman.europa.eu/en/opening-summary/en/194686>

Federazione Nazionale Pro Natura	Italy	
Great Lakes and Wetlands Association	Hungary	 Nagy Tavak és Vizes Élőhelyek Szövetsége
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	 WILDTIERSCHUTZ SCHWEIZ <small>Suisse de conservation de la faune sauvage Svizzera conservazione della fauna selvatica Proteccziun diis animals selvadis Svizra</small>
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	
Vogelbescherming Vlaanderen	Belgium	

Tierschutz Austria (Wiener Tierschutzverein)	Austria	 <p><b>TIERSCHUTZ AUSTRIA</b> © Wiener Tierschutzverein</p>
Deutsche Umwelthilfe e.V.	Germany	 <p>Deutsche Umwelthilfe</p>
Studio Wolverine	The Netherlands	 <p>WOLVERINE Wildlife productions</p>
Naturschutzinitiative e.V.	Germany	 <p>Natur schutz INITIATIVE</p>
Wildland Research Institute	United Kingdom	 <p><b>WRI</b> WILDLAND RESEARCH INSTITUTE</p>
Io non ho paura del lupo	Italy	 <p>Io non ho paura del lupo</p>
Rewilding Europe	The Netherlands	 <p><b>Rewilding Europe</b> Making Europe a Wilder Place</p>
National Park Rescue	United Kingdom	 <p><b>defend</b></p>
BUND Naturschutz in Bayern e.V.	Germany	 <p><b>BUND</b> Naturschutz in Bayern e.V.</p>
Extinction Rebellion Serbia	Serbia	 <p>БУНТ ПРОТИВ ИЗУМИРАЊА</p>
Protect ■ Natur-, Arten- und Landschaftsschutz e.V.	Germany	 <p><b>protect</b> Natur-, Arten- und Landschaftsschutz</p>

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	 Associazione Vittime della caccia <a href="http://www.vittimedellacaccia.org">www.vittimedellacaccia.org</a>
Bearsandothers ODV	Italy	 ASSOCIAZIONE BEARSANDOTHERS - O.D.V. Provincia di Trento Tutela benessere animale - protezione ambiente E-mail: bearsandothers@gmail.com PEC: bearsandothers@pec.it <small>La grandezza di una nazione e il suo progresso morale si possono giudicare dal modo in cui vengono trattati i suoi animali. - De Witt Clinton -</small>
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	
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

<p>Fauna &amp; Flora   Saving Nature Together</p>	<p>United Kingdom</p>	
<p>Luontoliiton susiryhmä - The Wolf Action Group</p>	<p>Finland</p>	
<p>Balkani Wildlife Society</p>	<p>Bulgaria</p>	

## Annex I. The wolf (*Canis lupus*) in Europe and Sweden

***Some background on wolves in Europe – the legal Framework.*** The Wolf is a species of 'Community interest' under EU law. In this case, it means Swedish wolves are of interest to all EU Citizens regardless of where these citizens are located. The definition of 'Community interest' stems from the concept of 'The Commons' - precious goods which require collective management, they should not be owned or disposed of by anybody because they are owned by everybody. The Concept of The Commons (in this case applied to the EU population of wolves) is therefore associated with the need for collective governance and shared responsibility.

The concept of "Community interest" in the EU Habitat Directive (*Directive 92/43/EEC*) originates from the broader context of European integration and the need to protect the natural heritage shared among EU Member States. This concept is rooted in the International and European vision of a common ecological good that transcends national boundaries, recognizing biodiversity as a shared resource and requiring collective management to ensure its preservation. A priority species, such as the Wolf, is considered a resource of value to the entire EU community, not just individual Member States or citizens of a single Member State. When the EU first introduced environmental protection in the Treaty (1987), it established that environmental protection is a Community objective requiring supranational measures.

**Applied to** wolves, that collective and supranational governance system is regulated by the EU Habitats Directive and related European Court of Justice Judgements which, together, prescribe the following: ( ) wolves are a strictly protected species and therefore cannot be killed, except exceptional circumstances; ( ) derogations are possible, but rare, especially when a species is not held in favorable conservation status nationally (as is clearly the case for Sweden); ( ) even the killing of a single individual can pose a risk to the conservation status of the national population (irrespective of the conservation status at regional level); ( ) the socio- economic and cultural reasons cannot override the conservation objective which is to reach and maintain the 'favorable conservation status' of the wolf in each EU Member State.

***The situation in Sweden.*** Sweden's wolf population is "endangered" and very small. It also decreased by almost 20% in the last year, and there are now 375 recorded individuals. According to EU habitats Directive, no killing can be authorized. However the Government announced earlier this year, that it intended to lower the minimum level further to (an arbitrary number of) 170 in the coming years – and, apparently, the Swedish Environmental Protection Agency has been asked to report the number of 170 wolves as the new, against-scientific evidences "favorable conservation status" of wolves in Sweden to the EU, instead of the current minimum of 300. Scientific experts have strongly criticized this move, and they say this will further risk the long-term survival of the species in Scandinavia. Currently, the Swedish government has authorized the culling of 30 wolves (5 entire families). In addition to the licensed hunt, it is estimated that around 20 more wolves will be shot following various decisions on 'protective hunting'. Assessments of Court cases debating the matter in Sweden has also revealed that the Swedish national law does not completely comply with the EU Habitat Directive, and this would allow national authorities to authorize such a cull in breach of EU Law. The problem of correct transposition and implementation should therefore be fixed as soon as possible.

Additional Illegal killing (poaching) - beyond the institutionalized illegal killing - is also present in Sweden. A study conducted by scientists from the Swedish University of Agricultural Sciences in the period 2000- 2017 demonstrated that promoting killing of wolves triggers the poaching of these animals and that the 'disappearance' rate of wolves (therefore including poaching and probably having poaching as primary cause) during the period of the study increased fourfold and thus the 'disappearance' rate had a further negative impact on the growth of the population. In 2022 a Letter published in *Science*<sup>3</sup> magazine and signed by Swedish scientists demonstrated that the Swedish killings (culls) have the effect of further endangering the Swedish population of wolves.

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<sup>3</sup> <https://www.science.org/doi/10.1126/science.add5299>

## Additional material

- **Relevant European Court of Justice Cases:**
  - 2021, Commission guidance document, strict protection Habitat Directive : <https://op.europa.eu/en/publication-detail/-/publication/a17dbc76-2b51-11ec-bd8e-01aa75ed71a1/language-en>
  - Austria and Spain, Wolves cases at the ECJ, July 2024 – PR of the ECJ- Judgements (prohibition to kill)
    - Austria: <https://curia.europa.eu/jcms/upload/docs/application/pdf/2024-07/cp240111en.pdf>
    - Spain: <https://curia.europa.eu/jcms/upload/docs/application/pdf/2024-07/cp240118en.pdf>
- [Scientific Statements, 700 signatures](#)
- [LCIE Statement](#)
- Policy brief: [http://jandarpo.se/wp-content/uploads/2017/07/2011\\_8epa\\_2.pdf](http://jandarpo.se/wp-content/uploads/2017/07/2011_8epa_2.pdf)
- The Guardian <https://www.theguardian.com/environment/2025/jan/01/sweden-wolf-hunt-halve-population-endangered-animal>
- Open Letter, Science <https://www.science.org/doi/10.1126/science.add5299>
- [https://nordiskmiljoratt.se/onewebmedia/NMT2023nr2\\_publicering\\_Ouro-Ortmark.pdf](https://nordiskmiljoratt.se/onewebmedia/NMT2023nr2_publicering_Ouro-Ortmark.pdf)
- Mass wolf cull in Sweden sparks debate, Vet Rec. 2023 Jan;192(2):58-59. doi: 10.1002/vetr.2649. Vet Rec Vet Rec-
- Olof Liberg, Johanna Suutarinen, Mikael Åkesson, Henrik Andrén, Petter Wabakken, Camilla Wikenros, Håkan Sand, Poaching-related disappearance rate of wolves in Sweden was positively related to population size and negatively to legal culling, Biological Conservation, Volume 243, 2020, <https://www.sciencedirect.com/science/article/abs/pii/S0006320719311498>