

29 October 2024

Mr Mikaël POUTIERS,

Secretary General, Bern Convention on the Conservation of European Wildlife and Natural Habitats,

Council of Europe.

CC: Ms Merike LINNAMÄGI, Chair of the Bureau

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The wolf targeted by false science provided by the European Commission

*The EU proposal to delist the wolf (*Canis lupus*) from Appendix II to Appendix III of the Bern Convention: unfit for purpose and lacking minimum scientific quality standards and therefore inadmissible. **Request to withdraw this item from the forthcoming 2024 December Standing Committee Meeting.***

Dear Mr Poutiers,

The 1979 Bern Convention on the Conservation of European Wildlife and Natural Habitats is the first international Treaty to protect species and habitats ever signed and ratified. The Bern Convention represents the first practical translation of Principle 2 of the 1972 Stockholm Conference on the Human Environment - renowned for the establishment of UNEP - which calls for 'the natural resources of the earth, including the air, water, land, flora and fauna and especially representative samples of natural ecosystems, [...] be safeguarded for the benefit of present and future generations through careful planning or management, as appropriate'. In 1979, the European Union (known then as the European Economic Community) did not even have an environmental policy secured within the Founding Treaty. The Bern Convention set the cornerstone for European conservation policies, and it did so within the framework of the Council of Europe, an institution dedicated to Human Rights, democracy and the rule of law.

Faced with the twin existential crises of climate change and biodiversity loss, European wildlife species are under threat; it is therefore essential that the conservation rules stemming from the Convention are backed up by the best available knowledge and science, and that nature conservation policies remain a top priority of the Parties to the Convention, regardless of the political will of a few.

Unfortunately, the EU proposal to delist wolves¹ - drafted and promoted by the European Commission - is far from meeting these standards, which is why we urge You to withdraw this item from the agenda of the Standing Committee meeting of 2 - 6 December 2024 and postpone the discussion on this topic until a time when more solid data and assessments are available.

As is evident from the European Commission's submission to the Standing Committee, **the proposed delisting of wolves² is poorly substantiated**. The only new information provided is a 2023 report³ on wolves ("The situation of wolf (*Canis lupus*) in the EU")⁴ which does not comply with the necessary minimum and rigorous quality standards demanded by the Convention and the scientific community.

For a scientific review to be valid and credible, it must adhere to several key requirements, including: be comprehensive, peer-reviewed and have authorial independence and expertise. None of these minimum requirements are met by the new information presented by the European Commission for the following reasons: the report⁵ was paid by the European Commission and drafted by a private consultancy company having a contract service with the European Commission; the two authors are not academics; the report is not peer-reviewed and, as of now, presents unverified data, and the views expressed therein are of the two authors only. Furthermore, several data presented in that report can be used to support the case for more wolf protection rather than less.

Clearly this report and the EU Proposal cannot be used as a source for delisting the wolf from the current classification of the Bern Convention.

We have asked a number of scientific experts to review the EU Proposal⁶ drafted by the European Commission and they have ranked it very poorly. The proposal makes "statements" rather than analyses, presents important gaps and data manipulation.

Two Scientific Statements addressing these weaknesses and correctly framing the European wolf conservation issue are being circulated within the scientific community and will be sent to your attention with the names of the signatories as well as published in the press.

We would urge you to refer to these forthcoming statements for any assessment around delisting of wolves.

1 - <https://rm.coe.int/inf15e-2024-submission-on-behalf-of-the-european-union-of-a-proposal-f/1680b1e94e>

2 - <https://rm.coe.int/inf15e-2024-submission-on-behalf-of-the-european-union-of-a-proposal-f/1680b1e94e>

3 - <https://op.europa.eu/en/publication-detail/-/publication/5d017e4e-9efc-11ee-b164-01aa75ed71a1/language-en>

4 - <https://op.europa.eu/en/publication-detail/-/publication/5d017e4e-9efc-11ee-b164-01aa75ed71a1/language-en>

5 - <https://op.europa.eu/en/publication-detail/-/publication/5d017e4e-9efc-11ee-b164-01aa75ed71a1/language-en>

6 - <https://rm.coe.int/inf15e-2024-submission-on-behalf-of-the-european-union-of-a-proposal-f/1680b1e94e>

The signatories of these Scientific Statements take distance from the EU delisting proposal which they deem to be unsubstantiated by science and instead strongly recommend keeping the current wolf protection status secured by the Bern Convention.

We are confident that You and the Parties would not wish to downgrade the needed protection for a species on the basis of poor science, in this particular case, a species for which the Convention has been key to promoting repopulation and tolerance instead of hostility.⁷

For these reasons we ask You to remove the following item: Proposal for amendment: Downlisting of the wolf (*Canis lupus*) from Appendix II to Appendix III of the Convention [T-PVS/Inf(2024)15 – Proposal by the European Union to amend Appendices II and III of the Bern Convention of the Conservation of European Wildlife and Natural Habitats by moving the wolf (*Canis lupus*) from Appendix II to Appendix III] **from the Agenda⁸ of the forthcoming December Standing Committee meeting of the Bern Convention.**

As the implementation of the Bern Convention “Strategic Plan⁹ towards 2030 nature conservation targets” has just kicked off, it is essential that the Parties take science - based decisions and refrain from taking steps which could hamper the conservation of protected species, with potential snowball effects for several habitats and dependent biodiversity.

The last Bern Convention Action Plan on Large Carnivores was published in 2020¹⁰. It is now time to launch a pan-European scientific update with harmonized indicators and targets at species and ecosystems before considering any wolf delisting proposal.

Look forward to hearing from You.

Yours sincerely,

the undersigned not - for - profit organisations:

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president, **Green Impact**, Italy.
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7 - Drenthen, M. (2015). The return of the wild in the Anthropocene. Wolf resurgence in the Netherlands. *Ethics, Policy & Environment*, 18(3), 318-337.

8 - <https://rm.coe.int/agenda13e-2024-44th-standing-committee-draft/1680b202bd>

9 - <https://rm.coe.int/press-release-en-adoption-of-bern-convention-strategic-plan/1680ada168>

10 - <https://rm.coe.int/1680746b76>

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