



**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

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

[1] <https://drive.google.com/drive/folders/13Y4fuG3OpUKY7Wtw9Y2dMbfpBVeGuyMy>

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



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 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 citizens[5] who have long and vigorously opposed the downgrading of the wolf's protection status[6].

However, an opportunity exists to rectify this situation and to regain the credibility of the Bern Convention and your own policies.

[1] December 2023: <https://www.wwf.eu/?12540466/Nearly-300-NGOs-support-wolf-protection-in-open-letter-to-President-von-der-Leyen>, September 2024 https://d1jyxxz9imt9yb.cloudfront.net/resource/1709/attachment/regular/Protect_Wolves_Statement.pdf

[2] 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

[3] 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>



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 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 81 organisations

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THE UNDERSIGNED 77 ORGANISATIONS





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