



20/02/2025

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:

- Halt further killings immediately.
- Secure the correct transposition of the EU Habitats Directive into Swedish national law, as it currently appears inconsistent with EU legislation in some respect.
- Take the case to the European Court of Justice.



- 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[1]; 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[2]. 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.

ü 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 78 organisations

for further correspondence on this Letter:

Gaia Angelini

Email: gaia.angelini@greenimpact.it

Mobile: +39 3480586408



THE UNDERSIGNED 74 ORGANISATIONS



Nagy Tavak és
Vizes Élőhelyek
Szövetsége



ECOJUST



**WILDTIERSCHUTZ
SCHWEIZ**



Suisse de conservation de la faune sauvage
Svizzera conservazione della fauna selvatica
Protección dils animals selvadics Svizra





**TIERSCHUTZ
AUSTRIA**
© Wiener
Tierschutzverein







Lifeescape

Wild Landscapes. For Life.



Rewilding Spain

