



## Independent review reveals Commission's proposal on wolf downlisting lacks scientific grounds

**34 NGOs urge EU Polish Presidency to pause all decisions until legal issues are cleared**  
**\* 41 NGOs by 9 April 2025**

**Brussels, 3 April 2025** - Independent scientists reviewed the analysis used as a scientific base by the European Commission - known as 2023 Blanco and Sundseth report - to justify the downlisting of European wolves (1). [The independent review](#) (2) found that the Blanco and Sundseth report does not provide scientific grounds for weakening of wolf protection - making the Commission's proposal unsubstantiated and contradicted by science.

Following the finding, [a group of 34 NGOs](#) (**NB: 41 NGOs had joined by 9 April**) led by environmental association Green Impact wrote to the Polish Presidency of the EU highlighting the lack of scientific backing, and urging to postpone a vote on the matter until the Appeal they brought to the European Court of Justice (3) about wolf downlisting is resolved. The Associations also shared with the Polish Presidency a **letter** sent to the European Commission where they asked to be part of the consultation process on the amendment of the EU Habitats Directive.

The [independent review](#) of the 2023 Blanco and Sundseth report was conducted by dr. Mark Fisher (Researcher, University of Leeds, UK) and dr. Ettore Randi (Adjunct Professor, Department of Bioscience, Aalborg University, Denmark). The review concludes that "uncertain and outdated data should not be used to push for the downgrading of protection of the European wolves population (...) when reviewing the Blanco's report nowhere is it recommended any revision of the protection status of the wolf".

In December 2024, five NGOs led by Green Impact [filed an appeal before the European Court of Justice](#) (Case T-634/24) to annul the 2024 Council's decision, the case was accepted in February this year and 17 associations joined and deposited an act on the intervention on the appeal. The case is now running, adding to the concerns about the legitimate grounds of the process that led to the 2024 Council's decision to downlist wolves and the related March 2025 Commission proposal to amend the Habitats Directive.

A [formal complaint by Client Earth at the EU Ombudsman](#) on downlisting is also currently pending.

The 34 associations congratulate Poland for the country's intention to keep strict protection for wolves at [national level](#) (4) and they welcome the recent [Polish State Council for Nature conservation Opinion](#) recommending abandoning the EU decision regarding downlisting, given the uncertain scientific backing and pending the legal and judicial inquiries.

**Gaia Angelini, President of Green Impact, said:** "*Wolves are the pillar of a 'nature - based' economy which is very much needed across Europe and has been supported with*

*200+ million Euro EU funds in the last decades. Yet, last year the European Commission hashed through the wolf protection downlisting, disregarding science and democratic consultative processes. It is a worrying development for nature protection for which the EU was once a frontrunner. The EU has never downgraded a species at the highest risk in more than 40 years. The vote by unanimity has been a guarantee through the years that no unscientific initiative could pass without sound scrutiny, preventing ungrounded moves.”*

The [scientific community](#), composed of hundreds of European experts, has expressed its opposition to wolf downlisting (5). During the last three years hundreds of NGOs - representing millions of EU citizens - have also [repeatedly written to EU](#) and national institutions advocating for no action in respect to downlisting of wolf protection, despite the EU institutions failing to establish a wide consultation with citizens and experts. A [Science Declaration of 2000+ scientists](#) and associations of scientists calling for the Green Deal come back also recommends not to change EU nature conservation law (Habitats Directive).

**Augustyn Mikos from Polish NGO Stowarzyszenie Pracownia na rzecz Wszystkich Istot said:** *“The process that led to the wolf downlisting decision is clearly biased. Several countries in Europe, including EU member states, did not support the EU downlisting, even at the Bern Convention. We call on the Polish Presidency to the EU to postpone all votes and decisions on this matter until the pending legal processes and supporting grounds for such a move are clarified.”*

The **UK, Monaco** and the **Czech Republic** have informed that they will not implement the downlisting decision adopted at the Bern Convention (December 2024). **Spain** and **Ireland** opposed the downlisting at the Council meeting last September, while **Malta, Cyprus, Slovenia and Belgium** abstained. These EU countries (except for UK and Monaco) have the opportunity to vote against wolf downlisting under the Habitats Directive.

Since the announcement of the Commission’s intention to reduce wolf protection, several countries such as Italy and Spain have experienced an explosion of illegal killing episodes since, given the lack of clarity, people understood that the EU is authorising the free-killing of wolves. These episodes have started to pose serious security risks for people and unjustified deaths of wolves, which add to the thousands of wolves already illegally killed yearly with guns and poison or victims of road accidents for which no solution has been implemented so far.

#### Notes

- (1) 2K Group EEIG, Blanco, J. C. and Sundseth K., [The situation of the wolf \(canis lupus\) in the European Union - An in-depth analysis](#), 2023
- (2) M. Fisher and E. Randi ,Uncertain and outdated data should not be used to push for the downgrading of European wolf (Canis lupus) populations. Some comments on Blanco & Sundseth (2023) report for the European Commission, April 2025. Link: [https://www.greenimpact.it/wp-content/uploads/2025/04/Wolf-Blanco-Sundseth-2023-Review-01.04.25\\_.pdf](https://www.greenimpact.it/wp-content/uploads/2025/04/Wolf-Blanco-Sundseth-2023-Review-01.04.25_.pdf)
- (3) Five Associations’ Appeal (case T-634/24) to the European Court of Justice for annulment of the 2024 Council decision to downlist wolves [Case T-634/24: Action brought on 6 December 2024 – Green Impact and Others v Council and Commission](#). The Appeal has received the support of 17 other Associations which made an act of intervention on the appeal.

- (4) Poland has said they will keep strict protection of wolves at national level regardless of the possible EU changes. [Wiceminister środowiska: Polska nie zamierza obniżyć statusu ochrony wilka | Nauka w Polsce](#)
- (5) 700 signatures of scientific experts against downlisting (2024)  
<https://drive.google.com/drive/folders/13Y4fuG3OpUKY7Wtw9Y2dMbfpBVeGuyMy> 2024, Statement of Large Carnivore Initiative for Europe ( LCIE/ IUCN) against downlisting  
[https://lci epub.nina.no/pdf/638670498186284408\\_LCIE%20-%20statement%20on%20wolf%20downlisting%20proposal.pdf](https://lci epub.nina.no/pdf/638670498186284408_LCIE%20-%20statement%20on%20wolf%20downlisting%20proposal.pdf)

**Further information:**

In the 2024 Judgements related to cases (C601/22 and C436/22) in Austria and Spain, the European Court of Justice confirmed the need to maintain strict protection and that the need to secure favorable conservation status of wolves prevails over socio-economic considerations; moreover the wolf cannot be designated as a huntable species at regional level when its conservation status at national level is unfavourable.

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