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AND NATURAL HABITATS

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**Wolf Culling Policy in Norway
(Norway)**

- COMPLAINANT REPORT -

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To:

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**The ninth progress report on complaint no. 2022/03
Wolf Culling Policy in Norway**

Abstract

This report updates the Bureau of the Bern Convention on developments in Norway's wolf management since its previous assessment. It shows that Norway has not implemented the recommendations of the Standing Committee or the Bureau and continues to pursue a culling policy that undermines the critically small and genetically impoverished South Scandinavian wolf population.

The official monitoring report for winter 2025/2026 confirms further deterioration. For the first time in eleven years, Norway failed to reach its already exceptionally low population target, while inbreeding increased because no new Finnish-Russian immigrant wolves have successfully reproduced. Despite these findings, the Ministry authorised the killing of the genetically valuable immigrant wolf V1265. Although it acknowledged that V1265 was a rare first-generation immigrant whose reproduction could improve the population's genetic status, it concluded that killing this individual would not, in isolation, threaten the population's survival and gave precedence to the wolf zoning policy and livestock interests. It is particularly deplorable that, despite repeatedly assuring the Bern Convention bodies that safeguarding the population's genetic status is a central priority, the Government has neither adopted a concrete plan to ensure that genetically valuable immigrant wolves are protected and able to reproduce within the population nor implemented effective measures to achieve that objective, as the case of V1265 clearly demonstrates. The report submits that this approach is incompatible with Articles 2 and 9 of the Bern Convention. The report further concludes that the Ministry failed to demonstrate that there was no other satisfactory solution before authorising the cull. Non-lethal measures were explored only briefly before being abandoned without adequate explanation. Norway has also continued its extensive policy of damage-based culling. Quotas remain in force, appeals have not been decided before implementation, and permits have been issued even before livestock losses occurred, exposing potentially genetically valuable wolves to a continued risk of being killed.

The Government has confirmed that it has no plans to amend its wolf management policy despite the Standing Committee's findings. The report also raises concerns regarding the proposed interpretation of Section 17 of the Nature Diversity Act and recent developments in Sweden, including a new wolf management plan facilitating continued population reductions.

The Complainants invite the Bureau to consider recommending an on-the-spot appraisal under Rule 11 to assess Norway's implementation of Articles 2 and 9 of the Convention.

1. Update on Norway's wolf culling policy and the protection of genetically valuable wolves

Population status has further deteriorated

The official Scandinavian wolf monitoring report for winter 2025/2026 confirms that the situation of the Norwegian wolf population has worsened considerably.ⁱ Only two litters were born entirely within Norway, while 3.5 litters were recorded after allocation of the shared Norwegian-Swedish border litters. This means that, for the first time in eleven years, the Norwegian population remained **below the already exceptionally low national population target of 4-6 reproductions**. The report also documents a continuing downward trend in the Norwegian subpopulation – 45-47 wolves were counted in the field, including half of the 21-22 cross-boundary individuals and 34-36 wolves confirmed only in Norway.

At the same time, the monitoring report documents that the genetic situation of the South Scandinavian wolf population has deteriorated. The average inbreeding coefficient increased from **0.21 to 0.24**, demonstrating that previous limited improvements in genetic status have already begun to reverse. The report attributes this development to the declining contribution of genetically valuable immigrants and their descendants.

Failure to protect a genetically valuable immigrant wolf

Rather than responding to this alarming development by strengthening protection of the remaining genetically valuable wolves, the Norwegian Government adopted decisions that further weakened the population's prospects for recovery. The Ministry of Environment and Climate adopted on 14 July 2026 a decision authorising the killing of wolf V1265, a newly arrived Finnish-Russian immigrant (F0).

Before the decision was taken, it was confirmed that V1265 represented a new Finnish-Russian immigrant, capable of reducing the severe inbreeding affecting the South Scandinavian wolf population if allowed to reproduce. The decision mentions approximately 50 livestock losses over a two-week period, outside the wolf zone in regions 3 and 6; however, it fails to specify how many of those losses were attributable to the genetically valuable immigrant wolf.

In its culling decision of 14 July 2026, the Ministry relied on the Norwegian Environment Agency's assessment that scientific research on the South Scandinavian wolf population shows that 2–3 immigrant (F0) wolves must successfully reproduce every ten years, or alternatively that one new immigrant reproduces every 4–5 years and its offspring subsequently reproduce, in order to counteract inbreeding and prevent further deterioration of the population's genetic status. The Ministry further noted that the latest Scandinavian wolf monitoring had shown that the level of inbreeding has increased again after several years of decline. It acknowledged that V1265 was a genetically valuable first-generation immigrant (F0) from the Finnish-Russian population whose reproduction could contribute new genetic material to the highly inbred Scandinavian population, and that it had been six years since the last genetically valuable immigrant entered the South Scandinavian wolf population in 2019 (the Setten male), which subsequently reproduced and introduced new genes into the population. The Ministry also emphasised that, under the joint Norwegian-Swedish guidelines for the management of genetically valuable wolves, such individuals should, as far as possible, be protected because they are essential for reducing inbreeding in the wolf population.

The Ministry further referred to the Environment Agency's assessment that the prolonged absence of reproducing immigrants demonstrates that new genetic input is necessary to prevent further deterioration of the population's genetic status, and that the South Scandinavian wolf population remains largely isolated, partly as a consequence of the current management regime. In addition, the Environment Agency cited the Swedish Environmental Protection Agency (Naturvårdsverket), which concluded that unless new eastern immigrants successfully reproduce within the Scandinavian population, achieving and maintaining favourable conservation status will become increasingly difficult, ultimately requiring either a substantially larger wolf population or repeated translocations of wolves.

Notwithstanding these findings, the Ministry adopted the Environment Agency's conclusion that **the culling of V1265, considered in isolation, would not threaten the survival of the population**. On that basis, it concluded that the documented livestock damage justified an exception to the general policy of protecting genetically valuable wolves, despite acknowledging both that the wolf population remained below the national population target and that V1265 was a particularly valuable immigrant. The Ministry reasoned that the livestock damage had persisted over time in an area prioritized for grazing, and noted that ten new livestock losses had been documented during the previous 24 hours. It therefore concluded that, **in this particular case, the objective of maintaining a clear wolf zoning policy should prevail over the interest in protecting a genetically valuable wolf**.

The wolf was shot by the State Nature Inspectorate on 20 July 2026, before the Oslo District Court could hear the organisations' request for interim measures suspending the culling decision.

By focusing solely on whether the loss of this individual would, *in isolation*, threaten the population's survival, the Ministry failed to assess the cumulative effects of continued losses of genetically valuable wolves on an already critically small and genetically impoverished population. This approach is difficult to reconcile with the precautionary principle and the requirement under Norwegian law to assess the cumulative impacts ("samlet belastning") on the population, particularly in light of the undisputed scientific evidence that the South Scandinavian wolf population remains genetically impoverished, that inbreeding has increased again, and that regular successful reproduction by new immigrant wolves is necessary to prevent further deterioration of the population's genetic status.

It is particularly deplorable that, despite repeatedly assuring the Bern Convention bodies that safeguarding the genetic status of the South Scandinavian wolf population is a central priority of Norwegian wolf management, the Government has neither adopted any concrete plan to ensure that genetically valuable immigrant wolves are protected and able to establish and reproduce within the population, nor implemented effective measures to achieve that objective, as the described case concerning wolf V1265 clearly shows.

Failure to implement effective non-lethal measures

The Ministry argued that it explored alternatives before authorising the cull, referring to an instruction issued on 9 July requesting efforts to locate, mark or relocate the wolf if feasible.

The Complainants submit that the Ministry failed to demonstrate that **there was no other satisfactory solution** within the meaning of Article 9 of the Bern Convention. Although the Ministry initially instructed the authorities to explore non-lethal alternatives, including locating, GPS-collaring and relocating the wolf, these efforts were abandoned after only a few days because the wolf could not be located. However, the same practical obstacle applied equally to the subsequent decision to cull the wolf, as the animal still first had to be located before it could be shot. Despite this, the Ministry did not explain why relocation was no longer considered a viable alternative or why additional efforts to implement non-lethal measures were not pursued. The decision therefore contains no convincing assessment that all satisfactory non-lethal alternatives had genuinely been exhausted before authorising the killing of a genetically valuable wolf.

The Ministry attached decisive weight to the principle of geographically differentiated management, under which livestock interests take precedence in areas prioritized for grazing (95% of Norway's land territory), and concluded that, in this case, maintaining a clear zoning regime should prevail over the conservation value of the individual wolf. It is also important to note that, although the Ministry informed the Swedish authorities of the culling decision on the day it was adopted, as far as the Complainants are aware, no prior consultation between the Norwegian and Swedish authorities regarding the fate of the wolf took place.

The killing of V1265 represents the loss of what may have been the only realistic opportunity in several years to introduce new genes into the South Scandinavian wolf population following the disappearance of the Setten immigrant. The Complainants consider that the decision constitutes a breach of Articles 2 and 9 of the Bern Convention.

Accordingly, the Complainants consider that Norway continues to ignore the decisions of the Standing Committee and the recommendations of the Bureau. The events of summer 2026 demonstrate that the authorities continue to apply a wolf management policy under which even exceptionally valuable immigrant wolves may be killed, despite acknowledged genetic necessity, increasing inbreeding and a national wolf population that has already fallen below the population target. In practice, the Ministry continues to give precedence to the politically determined objectives of maintaining a strict zoning

regime and protecting the economic interests of the grazing industry over the legal obligation to prevent any further deterioration of the conservation status of the already critically small and genetically impoverished wolf population.

2. Update on the 2025/2026 culling season

The Bureau has requested an update on the wolf culling during the 2025/2026 season.

No change in Norway's damage-based culling policy

Since the Bureau's latest communication, Norway has not amended its policy governing damage-based culling ("skadefelling"). On the contrary, the authorities have continued to authorise extensive quotas for conditional damage-based culling throughout the country despite the requests by the Standing Committee and the Bureau that Norway prioritise proven non-lethal measures and ensure the recovery of the wolf population.

During spring 2026, the Norwegian Environment Agency adopted a nationwide quota permitting the conditional culling of up to fourteen wolves outside the wolf management zone. Subsequently, the regional predator management boards adopted additional quotas for the 2026/2027 grazing season in virtually all regions where wolves may occur, with a **total quota of 28 wolves** (region 1 – quota of two wolves; region 2 – quota of two wolves; region 3 – quota of six wolves; regions 4 and 5 – quota of ten wolves; region 6 – quota of three wolves; region 7 – quota of two wolves; region 8 – quota of three wolves).

The complainant NOAH has appealed all regional quota decisions to the Ministry of Climate and Environment. In the appeals, it was emphasised that these decisions were adopted despite the authorities' own acknowledgement that it was uncertain whether the national wolf population target would even be reached during the monitoring season. It was also argued that killing dispersing wolves carries a substantial risk of removing precisely those individuals that are most important for improving the genetic viability of the South Scandinavian wolf population.

However, despite the fact that the damage-based culling period commenced on 1 June 2026, the Ministry has still not issued final decisions on these appeals. As a result, the challenged quota decisions have remained in force throughout the grazing season while the appeals have remained pending. This significantly undermines the effectiveness of administrative review. By delaying its decisions until after or during the implementation period, the Ministry deprives stakeholders of any meaningful opportunity to prevent irreversible harm to wolves protected under the Bern Convention before they are killed.

Damage-based culling has continued during the 2026 grazing season

The lack of effective administrative review has coincided with continued issuance of individual damage-based culling permits throughout the summer of 2026. Several wolves have been subjected to damage-based culling permits during the current grazing season, and several of these permits were issued **before any livestock losses had occurred**, relying only on observations of a wolf or assumptions regarding possible future damage. For example:

- permits were granted in Gran, Søndre Land, Vestre Toten, Gjøvik and Rendalen despite **no documented livestock losses**, based only on wolf observations;
- permits in Nord-Odal and Stange were initially issued although **no livestock had yet been killed**;
- the geographic scope of several permits was subsequently expanded or their duration prolonged while the original legal basis remained disputed.

These decisions demonstrate a continued focus on preventive use of lethal control that is difficult to reconcile with Article 9 of the Bern Convention, which permits derogations only in exceptional situations where serious damage cannot otherwise be prevented. As of 31 July 2026, three wolves have been killed as a result of damage-based culling, including the genetically valuable immigrant.

The events of summer 2026 demonstrate that Norway continues to expose genetically valuable wolves to a substantial risk of being killed through damage-based culling decisions. One particularly striking example concerns the Kongsberg wolf. After the damage-based culling permit had expired, DNA analyses showed that the wolf was in fact an F1 descendant of the genetically important Setten immigrant, demonstrating that the authorities had authorised lethal control without knowing the individual's genetic status.

3. Other developments

The Government has no plans to introduce or propose changes to wolf management

On 12 January 2026, NOAH wrote to the Prime Minister, the Ministry of Climate and Environment and the Ministry of Foreign Affairs requesting information on how the Norwegian Government intended to implement the Bern Convention Standing Committee's decision of December 2025. NOAH specifically asked whether the Government planned to propose legislative or policy changes to address the Committee's concerns. NOAH also urged the Government to initiate a genuine dialogue with stakeholders, as requested by the Standing Committee.

In its response of 18 June 2026, the Ministry acknowledged that the Standing Committee's December 2025 decision was more explicit than the 2024 decision in finding elements of Norway's wolf management to be incompatible with the Bern Convention. Nevertheless, it maintained its position that Norwegian wolf policy is already compliant with the Convention and stated that it has no plans to propose any changes to the Parliament in response to the Standing Committee's findings. Instead, the Ministry referred to ongoing dialogue with the Convention's bodies, cooperation with Sweden on the shared wolf population and continued efforts to address the population's genetic challenges. However, as demonstrated above, these efforts have not translated into effective measures to improve the population's genetic status or prevent its further deterioration.

The Government has not, to the Complainants' knowledge, undertaken or published any assessment of the social impacts of the current wolf management policy, as requested by the Bureau. Instead, the public debate has continued to be driven largely by demands from regional politicians and local authorities for increased culling, with no consideration given to whether wider implementation of non-lethal coexistence measures could reduce conflicts and promote broader social acceptance of wolf conservation.

The assessment of Section 17 of the Nature Diversity Act by the Expert Committee

In its report, published on 5 March 2026, the Expert Committee chaired by Professor Geir Ulfstein concluded that the current wording of Section 17 of the Nature Diversity Act does not fully correspond to Article 9 of the Bern Convention.ⁱⁱ In particular, the Committee considered that the statutory requirement that there must be an "ongoing attack" or that such an attack is "highly likely to occur imminently" does not fully correspond to Article 9 of the Bern Convention. Instead, it proposed that the assessment should be based on a broader, composite evaluation encompassing both the degree of risk and the potential extent of damage. The Committee also suggested that a more extensive right to act in defense of necessity of livestock may exist in areas where reindeer husbandry is particularly vulnerable.

From the Complainants' perspective, the Committee's proposal raises significant concerns. While it criticises the current wording, it does not provide a clear interpretation that safeguards the exceptional nature of the derogation. On the contrary, replacing the requirement of an imminent attack with a

broader assessment of risk and potential damage can instead lead to expanding the circumstances in which wolves (and other large carnivores) may be killed in alleged situations of defense of necessity. In the Complainants' view, any right to kill wolves on grounds of defense of necessity to protect grazing animals must remain strictly limited to situations of immediacy (ongoing attack), ensuring that lethal action remains a measure of last resort rather than a preventive management tool.

Developments in wolf management in Sweden

In June 2026, the Swedish Environmental Protection Agency adopted a new national wolf management plan for 2026–2031.ⁱⁱⁱ The plan is based on the Government-imposed reference value of only 170 wolves and is intended to facilitate a stepwise reduction of the Swedish population towards that level. As an initial step, the Government has set a target of reducing the population to approximately 270 wolves through the next licence hunt. The transfer of decision-making powers to the county administrative boards and the stated intention to use annual licence hunting indicate that extensive culling is being prepared for the coming winter and potentially for subsequent years. Unlike previous delegation decisions, which were granted annually, the new delegation is valid for three years.^{iv}

The plan also envisages closer cooperation between the Swedish, Norwegian and Finnish authorities. This includes intensified cooperation on population monitoring, DNA analysis, demographic and genetic assessments, genetically important individuals and the possible development of a joint management plan or a strengthened trilateral framework. Closer cross-border cooperation is welcome and necessary, given that the wolves in Sweden and Norway form a shared, highly inbred South Scandinavian population and depend on immigration from the east for genetic reinforcement. However, such cooperation must strengthen the protection and recovery of the population and cannot be invoked to justify lower national population levels, increased culling or a weakening of each State's individual obligations under the Bern Convention. In particular, reliance on wolves occurring in neighbouring countries cannot replace the duty of both Sweden and Norway to maintain a viable and adequately protected wolf population within their own territory.

4. Concluding remarks

The Complainants respectfully submit that developments during the 2025/2026 season demonstrate that Norway has not implemented the recommendations of the Standing Committee or the Bureau. Damage-based culling continues to be authorised extensively, including before livestock losses have occurred, while administrative appeals remain undecided. The decision to kill the genetically valuable immigrant wolf V1265 further illustrates that Norway's wolf management policy remains fundamentally unchanged despite the repeated concerns expressed by the Bern Convention bodies.

At its meeting in April 2026, the Bureau tasked the Secretariat with convening a meeting between the relevant decision-makers in the Norwegian Government and/or Parliament, the Complainants and the Bureau to discuss an alternative approach to the current wolf culling policy. The Complainants continue to welcome this initiative and remain fully committed to participating in such a meeting.

In light of the continued lack of implementation of the Standing Committee's recommendations, the Complainants respectfully invite the Bureau to consider whether it may now be appropriate to recommend that the Standing Committee arrange an on-the-spot appraisal pursuant to Rule 11 of its Rules of Procedure. An independent expert mission could assist the Standing Committee by providing an objective assessment of Norway's implementation of the Convention, including an assessment of whether Norway complies with Article 2 of the Convention and the practical application of the derogation regime under Article 9.

Yours Sincerely,

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ⁱ Petter Wabakken, Linn Svensson, Erling Maartmann, Kristoffer Nordli, Pierre Dupont, Cyril Pierre Milleret, Richard Bischof, Mikael Åkesson, & Øystein Flagstad (2026). Bestandsovervåking av ulv vinteren 2025-2026 (Report No. 1-2026). Rovdata, SLU Viltskadecenter og Universitetet i Innlandet. <https://hdl.handle.net/11250/5523638>

ⁱⁱ <https://www.regjeringen.no/no/dokumenter/rovviltforvaltning-og-samisk-reindrift-norges-folkerettslige-forpliktelser/id3150979/>

ⁱⁱⁱ <https://www.naturvardsverket.se/amnesomraden/jakt-och-vilt/forvaltningsplaner-for-vilt/nationell-forvaltningsplan-for-varg/>

^{iv} https://www.naturvardsverket.se/om-oss/aktuellt/nyheter-och-pessmeddelanden/2026/juni/ratten-att-fatta-beslut-om-licensjakt-pa-varg-overlamnas-till-lansstyrelserna/?utm_source=chatgpt.com