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

- COMPLAINANT REPORT -

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Update Report – February 2026

To:

Bureau of the Standing Committee of the Bern Convention

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

In reference to the letter of 19 December 2025 by the Secretary of the Bern Convention, complainants NOAH – for animal rights (Siri Martinsen and Katrin Vels), Margareth Konst, asst. prof. Stefanie Reinhardt and prof. Ragnhild Sollund (referred to as “the Complainants”) are hereby submitting an update report to be addressed at the 2026 spring meeting of the Bureau.

Summary

The Norwegian wolf population continues to decline and remains critically endangered. In winter 2024/2025, 4.5 reproductions were recorded in the South Scandinavian population, of which only three occurred exclusively in Norway — the lowest number since 2013/2014. Recent figures indicate only 34–45 individuals remain. Despite major uncertainty as to whether even the minimal population target will be met in 2026, authorities have authorised the culling of 27 wolves outside the wolf management zone for 2025/2026. This represents around 40% of the Norwegian population and reflects a policy of keeping 95% of the country wolf-free. Experts warned that killing certain territory-marking wolves could reduce the probability of reaching the population target to below 50%. Nevertheless, the Ministry justified the decision by referring to “overriding public interests,” particularly predictable zone management and conflict mitigation. The Complainants argue that this policy violates the Bern Convention. Authorising culling while reproduction levels are uncertain and immigration from the Finnish–Russian population is unpredictable risks undermining the survival of the population. The Ministry’s reliance on potential immigration is speculative and insufficient, especially given persistent inbreeding and past cases in which genetically valuable wolves were killed during hunts. Swedish courts recently repealed planned wolf culls, ruling that reducing the population toward 170 wolves lacked scientific basis and would jeopardise favourable conservation status. The European Commission has likewise questioned Sweden’s reported favourable reference population. Norway remains in breach of the Bern Convention and the Complainants call for fundamental changes to wolf management policy.

1. The current state of the wolf population in Norway

The Norwegian wolf population continues to decline. In winter 2024/2025, 4.5 wolf reproductions were registered, of which only three were exclusively in Norway. This represents a decline from the previous season and is the lowest number recorded since 2013/2014. There remains significant uncertainty as to whether even the very low population target of three litters in Norway will be met in 2026.

The South Scandinavian population is estimated at approximately 375 wolves in 2024/2025, a reduction of 65 animals compared to the previous year. In Norway, 50–57 wolves were registered during the winter season (including culled individuals), and recent updates indicate only 34–45 wolves currently detected. The Norwegian population has declined steadily since 2022. The average inbreeding coefficient remains high at 0.21, reflecting serious genetic vulnerability.

2. Culling of wolves for population control in 2025/2026 outside the wolf management zone

The quota-based culling of wolves for population control (also referred to as license hunting) outside the wolf management zone commenced on 1 December 2025 throughout Norway and will continue until 31 May 2026. The regional large carnivore committees adopted quotas for the culling of a total of 27 wolves, and this quota was upheld by the Ministry of Climate and Environment in its decision of 30 November 2025 (corrected version published on 9 December 2025).ⁱ

The regional carnivore committees decided not to permit culling of wolves within the wolf management zone in 2026 (hereinafter “the wolf zone”), as they considered it uncertain whether the population target would be met the following year and that such culling could therefore be detrimental to the long-term survival of the South Scandinavian wolf population (see the Complainants’ report of 14 November 2025 for further details).

The quota of 27 wolves outside the wolf zone constitutes approximately 40% of the wolf population in Norway (50–57 wolves).ⁱⁱ This quota is excessively high and effectively aimed at keeping 95% of Norway’s land territory wolf-free. Data from previous years show that around one-third of the wolf population in Norway is killed during license hunting. However, in 2025 only five wolves were killed out of a total quota of 43 wolves – four within the wolf zone and one outside the zone. During this year’s license hunt, one wolf has been culled so far.

Although culling outside the wolf management zone primarily targets lone dispersing wolves, territory-marking and potentially breeding wolves may also be culled if their territory, or part of it, lies outside the wolf zone. In October 2025, the authorities registered two wolves straddling the wolf management zone and adjacent areas. The Norwegian Environment Agency stated in its expert assessment that if this territory-marking pair were culled, the probability of achieving the wolf population target in 2026 would fall below fifty percent and would depend on new occurrences of territory-marking wolves within the wolf zone and successful reproduction in the coming spring. Based on the Agency’s expert assessment, the Ministry stated that it “**considers it uncertain whether the population target for wolves will be achieved during the current season and after the next breeding season in spring 2026.**”

Despite this conclusion and the Agency’s warning — and despite the high uncertainty regarding both new wolf occurrences and reproduction — the Ministry decided to permit culling of the wolf pair to protect “overriding public interests.”ⁱⁱⁱ With regard to this ground, the Ministry stated in its decision: *“After an overall assessment, with particular emphasis on the consideration of clear and predictable zone management, cf. the principle of differentiated management, and the importance this has for mitigating conflict related to wolf management and ensuring trust in the management, the Ministry finds that there are public interests of significant importance that warrant the culling of territorial wolves in the relevant area immediately north of the wolf zone, cf. nml. § 18 first paragraph letter c. It is pointed out, among other things, that these are not genetically valuable wolves. The Ministry finds that these considerations outweigh the uncertainty regarding the achievement of the population target for wolves.”*

The Complainants argue that the Ministry’s decision regarding license hunting outside the wolf management zone in 2025–2026 is in breach of the Bern Convention for the reasons explained below.

Firstly, the Complainants recall that the wolf population target of 4–6 annual reproductions has been criticised by the Standing Committee as “extremely restricted” and in breach of Article 2 of the Bern Convention. The Committee has urged the Norwegian government, in its decisions of 2024 and 2025, to allow the wolf population to recover to a satisfactory conservation level.

However, the Ministry has now authorised culling of wolves in a situation of significant uncertainty as to whether even this very low population target will be met. This constitutes a clear breach of the Nature Diversity Act and the Bern Convention. It also contradicts the conditions for culling as clarified by the Supreme Court in its 2021 judgment:

“Norway is bound under international law to ensure the survival of the wolf in Norwegian nature. Norway cannot leave it to Sweden alone to ensure the survival of the South Scandinavian population. ... Norway does not violate Article 2 of the Bern Convention as long as the Norwegian subpopulation is sufficiently large for the population target to be met.”

The Norwegian subpopulation is currently not sufficiently large for the population target to be met. At the time the culling quota outside the wolf zone was approved, only one wolf litter in Norway had been confirmed. Despite this, the Ministry concluded that the adopted quota does not threaten the survival of the population, provided certain conditions are met. These conditions are described as follows:

“Provided that the management authorities ensure that a sufficient number of immigrants from the Finnish–Russian population are able to migrate into and establish themselves within the Scandinavian population, the Norwegian Environment Agency considers that the adopted quotas will not threaten the survival of the population. The Ministry bases its assessment on these considerations and, subject to the condition that the County Governors in all regions have the authority to halt licensed hunting in the event of suspected genetically valuable individuals on migration, finds that the requirement that the removal must not threaten the survival of the population is fulfilled for the quotas outside the wolf zone adopted by the Regional Carnivore Committees in Regions 1, 2, 3, 4–5, 6 and 8, cf. section 18, second paragraph, of the Nature Diversity Act.”

The Norwegian Environment Agency has further stated in its expert assessment that without immigration, the population must be managed at a significantly higher level than the current combined population target in Norway and Sweden in order to ensure survival.

It is not specified in the decision what constitutes this “sufficient number of immigrants from the Finnish–Russian population.” It is a well-known fact that the South Scandinavian wolf population suffers from high inbreeding (the degree of inbreeding in the population is, on average, comparable to that of the offspring of a pair of siblings). Furthermore, the Ministry’s statement in the summary that the territory-marking wolves are not genetically important individuals is contradictory, as the Ministry states on page 21 that *“the identity of these two wolves is unknown due to lack of DNA findings.”*

The Complainants fail to see how the authority of the County Governors to halt licensed hunting in the event of suspected genetically valuable individuals on migration can “remedy” the conclusion that it is uncertain whether the population target of at least four wolf reproductions (of which three exclusively in Norway) will be achieved during the current season and after the next breeding season in spring 2026. It is a non sequitur to conclude that culling is not detrimental to the survival of the wolf population merely because there is a theoretical possibility that an unspecified number of genetically important wolves may migrate and reproduce in spring 2026. Furthermore, genetically important wolves have been killed “accidentally” during license hunting in recent years, demonstrating that the County Governors’ authority to halt licensed hunting is insufficient to prevent such “accidents.”

For the second consecutive year, the Ministry has authorised culling of wolves for population control in the northernmost areas of Norway, stating that *“wolves from the Finnish–Russian population have limited value for the Scandinavian population as long as they remain so far north.”* This understanding is inconsistent with scientific data demonstrating that wolves disperse over long distances^{iv} and also contradicts data used for the Red List assessment in Sweden.^v

The authorities further argue that because the population target is to be achieved within the wolf zone, it is irrelevant how many roaming or newly established wolves are found outside the wolf zone. In the Complainants’ view, this clearly demonstrates that the authorities are not concerned with improving the genetic status of the wolf population in Norway — which requires that dispersing wolves be allowed to migrate over large areas — but are instead primarily focused on adjusting wolf management to strict political guidelines, disregarding biological and ecological realities.

As highlighted in the Complainants' previous report, each year a considerable number of wolves are killed or disappear as a result of illegal hunting, which has been shown to affect reproductive success (for example, if one of the leading animals is killed). In light of these factors, the authorities are, at the very least, obliged to exercise precaution when deciding on culling for population control and when setting quotas. However, the Ministry has disregarded this established management principle and stated that *"there is sufficient knowledge about the effects the decision may have on the natural environment."* This assertion of "sufficient knowledge" is clearly unfounded, as the Ministry states on page 22 of the decision that *"it is only when the winter's registrations are completed that one knows for sure how the population relates to the population target."*

It is important to reiterate that the wolf is listed as "critically endangered" on the Norwegian Red List of Species. The Ministry states the following regarding this status: *"Regarding the wolf's status on the Red List of Species, the Ministry would like to point out that this is a direct consequence of the national population target adopted by the Parliament and ... that large carnivore populations should be managed as close to the population targets as possible."*

Consequently, the Norwegian government continues to pursue a policy aimed at keeping the wolf population in critically endangered status indefinitely.

Secondly, the Ministry considers "clear and predictable zone management" to constitute an "overriding public interest" and thereby a ground for an exception to the strict protection of the wolf in Norway. The Complainants point out that zone-based management was intended to be one consideration in the exercise of discretion when deciding whether to allow culling in specific cases, not a general ground for culling as applied by the Ministry. It constitutes a breach of Article 9 of the Bern Convention to permit the culling of strictly protected wolves on the general ground of maintaining 95% of Norway's territory as wolf-free. This is clearly in contradiction to the Standing Committee's decision adopted in December 2025, in which the Committee *"urged the Government of Norway to abolish strict zoning where the wolf is excluded from 95% of the national territory and to reconsider the practice of licensed hunting of wolves for population control as the main conflict mitigation measure"* (para. 221).

Thirdly, the Ministry has not meaningfully considered alternative non-lethal measures but has simply concluded that no such alternatives exist due to "guidelines in the predator policy." This is clearly contrary to the Standing Committee's conclusion in December 2024, where the Committee *"stressed that considering lethal prevention measures a norm, on the grounds of 'overriding public interests,' where alternative means are not exhausted, is contrary to Article 9 of the Bern Convention regardless of the protection status of the species ..."* (para. 176).

In the culling decision, the Ministry responded to the argument that culling should not be permitted due to the "Open File" under the Bern Convention as follows:

"The Ministry of Climate and Environment considers it a serious matter that a case has been opened against Norwegian wolf management under the Bern Convention. At the same time, on the Norwegian side it is believed that the management is in line with the obligations under the Convention. This is, among other things, based on the fact that the Supreme Court has on two occasions in recent years found that decisions on license hunting, both outside and within the wolf zone, have been in accordance with obligations under the Bern Convention."

The Complainants find it extremely concerning that the Government has chosen to disregard the Committee's conclusions regarding Norway's wolf management and acts as though the decisions of the Standing Committee are irrelevant.

3. Developments in Sweden

The Swedish authorities had planned to reduce the wolf population in Sweden to 270 animals this winter by adopting a culling quota of 48 wolves. Sweden has also reported to the European Commission a figure of 170 wolves as the favourable reference population (FRP), forming the basis for the planned gradual reduction of the wolf population to that level in the coming years. However, the culling decisions were repealed by Swedish courts in January 2026. The Court held that favourable conservation status presupposes a clearly higher population level than 170 wolves, which is estimated by the Swedish Environmental Protection Agency to constitute the minimum viable population. The Court found no scientific basis for departing from the previous assessment that 300 wolves constitute the favourable reference population in Sweden. It concluded that license hunting would make it more difficult to maintain a favourable conservation status for wolves in Sweden, contrary to the EU Habitats Directive, and therefore could not be permitted.

In its letter of 11 November 2025, the European Commission contested the reporting by the Swedish authorities of 170 wolves as the favourable reference population for the Swedish wolf population. The Commission found that the reported FRP value is not supported by scientific evidence and, in any event, should be set at a level higher than the minimum viable population. The Commission also questioned why the report excludes a large part of Sweden's boreal region from the favourable reference range for wolves.

According to the Norwegian authorities, the level of obligations arising under Articles 2 and 9 of the Bern Convention is lower than the obligation under the EU Habitats Directive to ensure favourable conservation status, which is binding on Sweden. In its expert assessment, the Norwegian Environment Agency stated that, in order *“to ensure the long-term survival of the species, Norwegian wolf management is also dependent on the Swedish management authorities maintaining a subpopulation of wolves that is significantly larger than the Norwegian subpopulation.”*

The absurdity of this premise is evident — irrespective of the actions taken by the Norwegian authorities concerning wolves in Norway, the requirement to ensure the survival of the shared population would, under this reasoning, always be fulfilled as long as Sweden complies with its obligations under the Habitats Directive to maintain favourable conservation status. This constitutes a “manifestly absurd” interpretation of the Convention's obligations^{vi} and, in our view, amounts to straightforward free-riding on Sweden's conservation efforts. There is no formal management cooperation between the two countries; therefore, relying solely on the shared population when adopting culling decisions is legally unfounded.

4. Other comments

In January 2026, the Minister of Climate and the Environment replied to a written question from a Member of Parliament representing the Liberal Party regarding the authorisation of license hunting of wolves when the number of reproductions is very low or even below the established population target. In his reply, the Minister emphasised the importance of adhering to the political guidelines according to which the population target for wolves should primarily be achieved within the wolf zone, and that it is desirable to limit the spread of wolves outside this area.^{vii} The Minister did not mention the case-file under the Bern Convention or the decisions of the Standing Committee.

On 12 January 2026, NOAH sent a letter to the Government inquiring about its plans to follow up on the Committee's decision, including whether it intends to submit proposals to Parliament addressing the Committee's concerns regarding the extremely restricted population target and the zone-based management regime, which does not allow the wolf population to expand beyond the very limited wolf zone. NOAH also expressed its willingness to cooperate and encouraged the Government to take the initiative to establish dialogue. As of 13 February 2026, NOAH has not received a reply. However, on 11 February 2026, the Minister responded to a written question from a Member of Parliament representing the Green Party concerning the Government's plans. The Minister stated that

“his view is that the current practice for population control of the wolf is in accordance with Norway’s obligations under the Bern Convention”.^{viii}

Lastly, the Complainants wish to refer to an issue raised in their previous report concerning the new Wild Resources Act, which will enter into force on 1 July 2026. The Complainants are concerned that the new legislation permits the general use of aircraft and motor vehicles, including drones, as well as thermal imaging devices during the culling of large carnivores for damage prevention. The Complainants submit that these new provisions of the Wild Resources Act are incompatible with Article 8 of the Bern Convention with regard to species of wild animals protected under Appendices II and III to the Convention. Any exception permitting the use of such prohibited means may only be granted following a case-by-case assessment in accordance with Article 9 of the Bern Convention, and not as a general exception applicable to all cases of culling of large carnivores for damage control.

5. Concluding remarks

In conclusion, the Norwegian Government has still not taken any steps to comply with the two decisions of the Standing Committee and has instead taken measures that further weaken the conservation of the wolf in Norway. Norway therefore remains in breach of the Bern Convention, in particular Articles 2, 4, 7 and 9. Furthermore, with regard to Appendix III species, maintaining the national population at a critically endangered level is contrary to the Convention.

The Complainants respectfully request that the Bureau arrange a meeting between the Secretariat, the Complainants and the Government in order to identify solutions aimed at introducing fundamental changes to wolf management in Norway.

Yours Sincerely,

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ⁱ <https://www.miljovedtak.no/VedtakSok/VisSak?sakid=60853>

ⁱⁱ <https://rovdata.no/Ulv/Bestandsstatus.aspx>

ⁱⁱⁱ This latter justification is invoked in areas where there are no grazing animals, and the risk of damages is thus not present. Previous experience shows that wolves marking territory in the part of the Region 5 located north of the wolf zone and east of the River Glomma in the municipalities of Stor-Elvdal, Rendalen and Engerdal, and outside the grazing areas of the Sølendalen common pasture association and the Elgå reindeer herding district, may make use of areas both inside and outside the wolf zone. Preliminary data indicate the presence of a wolf pair in the southern part of this area.

^{iv} The natal straight-line dispersal distance of a GPS-collared female wolf from the Scandinavian population was 1,092 km from southeast Norway to northeast Finland, with a multistage actual travel distance of >10,000 km. See Wabakken, P., Sand, H., Kojola, I., Zimmermann, B., Arnemo, J. M., Pedersen, H. C., & Liberg, O. (2007). Multistage, long-range natal dispersal by a global positioning system-collared Scandinavian wolf. *The Journal of Wildlife Management*, 71(5), 1631-1634; Morales-González, A., Fernández-Gil, A., Quevedo, M., & Revilla, E. (2022). Patterns and determinants of dispersal in grey wolves (*Canis lupus*). *Biological Reviews*, 97(2), 466-480.

^v The Swedish wolf population was uplisted from “vulnerable” (VU) to “threatened” (EN) in the Red List of Species 2020. In the explanation to the uplisting, the high degree of inbreeding is mentioned as a serious threat to the long-term viability of the wolf population, because the immigration of new wolves is hindered in reindeer herding areas in Sweden, Finland and Norway where culling for damage control is exercised generously. See <https://artfakta.se/naturvard/taxon/canis-lupus-lupus-100024>

^{vi} Trouwborst, A., Fleurke, F. M., & Linnell, J. D. (2017). Norway’s wolf policy and the Bern convention on European wildlife: Avoiding the “manifestly absurd”. *Journal of International Wildlife Law & Policy*, 20(2), 155-167.

^{vii} <https://www.stortinget.no/no/Saker-og-publikasjoner/Sporsmal/Skriftlige-sporsmal-og-svar/Skriftlig-sporsmal/?qnid=114329>

^{viii} <https://www.stortinget.no/no/Saker-og-publikasjoner/Sporsmal/Skriftlige-sporsmal-og-svar/Skriftlig-sporsmal/?qnid=114702>