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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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

- GOVERNMENT REPORT -

Document prepared by the

Royal Norwegian Ministry of Climate and Environment



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Government report - Complaint No. 2022/03 Norway - Wolf culling policy

In this report, the Norwegian Ministry of Climate and Environment respond to questions raised by the Bureau in its letter dated May 18th and provide relevant updates concerning the wolf management.

The Ministry maintain that Norwegian wolf culling policy is consistent with the obligations of the Convention. At the same time, we take seriously the concerns and decisions of the Bureau and the Standing Committee regarding the policy, and we would appreciate continued dialogue with a view to resolving this case.

One wolf was culled on the basis of the quota for culling outside the wolf management area during the 2025-2026 season. Within the wolf management area, no culling was authorised for this season. Results from the 2025-2026 monitoring season published in June 2026 documented litters in two Norwegian territories, as well as three litters in cross-border territories. In terms of the national population target, this corresponds to a total of 3,5 litters in Norway. The wolf population is consequently below the national population target for the first time in eleven years. Consequently, decision-making authority regarding wolf culling within the wolf management area for the winter of 2027 has been transferred to the Norwegian Environment Agency.

The inbreeding coefficient of the Scandinavian wolf population has increased compared to last year. Norwegian authorities continue efforts to improve the population's genetic status by protecting as far as possible immigrating individuals. A risk assessment on introgression of parasites and diseases has been commissioned to be delivered by mid-September this year. The assessment will inform a revised routine for handling and possible translocation of genetically important wolves in Norway.

The report from the group of legal experts that was appointed in 2024 to deliver an assessment of the relationship between Norway's legal obligations on preservation of large carnivores and indigenous peoples, was delivered on March 5th. The report does not indicate that the provision on emergency culling in Section 17 of the Nature Diversity Act is contrary to the Bern Convention. Following the 2025 amendment, the application of the provision is being closely monitored. As of the date of this report, the amended provision has not been applied.

The Wildlife Resources Act entered into force on July 1st, replacing the Wildlife Act. Amendments to related regulations ensure that methods prohibited under the Convention may only be authorised where the conditions for derogation under Article 9 are met.

The report also provides updates on recent court proceedings concerning the wolf management and dialogue with Swedish authorities.

Introduction

The Norwegian Ministry of Climate and Environment refer to your letter dated May 18th, 2026, inviting Norwegian authorities to send a report with requested information and other relevant updates to be addressed at the fall meeting of the Bureau.

General comments

As described in our report dated February 11th, 2026, we maintain the position that Norwegian wolf culling policy is in accordance with the obligations of the Bern Convention. For an elaboration of our view, we refer to previous reports. Nevertheless, we take seriously the decisions of the Standing Committee and the Bureau regarding the wolf culling policy, and we would appreciate continued dialogue with a view to resolving this case. We therefore welcome the initiative from the Bureau to convene a meeting with the parties to the case file.

The Bureau asks about the social impact of the approach where culling inside the wolf management area has been allowed to safeguard overriding public interests. As far as the Ministry is informed, there has not been studies on the social impact of the current policy¹. Culling of wolves has been allowed inside the wolf management area based on a balancing of public interests, as set out by the Norwegian Parliament. The Ministry's view is that a policy that follows up the decisions made by the Parliament regarding the wolf management, within the boundaries of the Nature Diversity Act and the Bern Convention, ensures predictability and upholds public confidence in the Government's compliance with decisions made by the Parliament. The Ministry's assessment is that this reduces overall social conflicts related to wolves. The Norwegian Supreme Court has ruled on the interpretation and application of the corresponding criteria "overriding public interests" in the Nature Diversity Act both outside and inside the wolf management area. The Bureau urges the Government to apply non-lethal measures in the wolf management policy. The management system established by the Parliament, consisting of amongst others the legal framework of the Nature Diversity Act, the population target and the management area, directs the application of not-lethal measures. For a more elaborate description of the policy concerning application on non-lethal measures, we refer to previous reports. However, with reference to the open case file, we intend to carry out an external assessment of Norwegian wolf management in relation to *Best practices for management of large carnivores in Europe with respect to lethal and non-lethal management measures*², as referred to by the Standing Committee in its decision from December 2025.

Results of culling and population status in the 2025-2026 season

Inside the wolf management area, the regional management authorities decided not to allow culling of wolves during winter 2026. In areas outside the wolf management area, the Ministry decided to allow culling of up to 27 wolves for the season which last from 1st December 2025, until May 31st,

2026. One wolf was culled from the quota outside the wolf management area during this season.

The final conclusions on the monitoring of the Scandinavian wolf population were published on June 1st, 2026³. During the 2025 - 2026 monitoring season, litters were documented in two Norwegian territories, as well as three litters in cross-border territories. In terms of the Norwegian population target, this corresponds to a total of 3,5 litters in Norway, as litters in cross-border territories count as half a litter. This means that the population is below the population target for the first time in 11 years. As the population is registered below the population target, the authority to make decisions regarding culling inside the wolf management area during winter 2027 is transferred from the regional management authorities to the Norwegian Environment Agency, according to the system established in the Regulations relating to the management of large carnivores⁴.

The Wildlife Resources Act

The Wildlife Resources Act⁵ entered into force on July 1st, 2026, and replaced the Wildlife Act⁶. In relation to management of wolves, the Wildlife Resources Act regulates how culling and killing in concrete cases of damage may be carried out, when such removal has been allowed pursuant to criteria set out by the Nature Diversity Act and the Regulation on the management of large carnivores. Compared to the Wildlife Act, the Wildlife Resources Act gives a more updated regulation of hunting, culling and other forms of exploitation of wildlife. Appendix IV of the Bern Convention is an important framework for the Act, especially for the provisions on methods for hunting, culling and killing of wild species in concrete cases of damage. We want to draw attention to Section 32 of the Act, which gives a more complete implementation of the obligations that follows from Article 8 and Appendix IV of the Convention.

The Wildlife Resources Act was adopted by the Norwegian Parliament in 2025. When the Norwegian Parliament considered the legislative proposal, the Parliament decided that the general prohibitions on use of light sources that emit visible light and thermal and light amplifying weapon sights, and on use of aircraft, motor vehicles and motorised vessels, shall not apply to killing of wild species in concrete cases of damage. The Parliament emphasised the need for effective removal of large carnivores in these situations⁷.

The use of artificial light sources, devices for illuminating targets and sighting devices for night shooting comprising an electronic image magnifier or image converter, and the use of aircraft and motor vehicles in motion, is included in Appendix IV of the Convention, and prohibited in terms of use on species listed in Appendix II and III of the Convention, pursuant to Article 8. To ensure compliance with the obligations of the Convention, the Ministry have made changes to the Regulations relating to the management of large carnivores and the Regulations on wildlife⁸. The changes entail that methods prohibited pursuant to the Bern Convention, may only be permitted if the relevant authority has found that the criteria set out in Article 9 of the Convention are met. In addition, the use of such methods shall be reported to the relevant authority, enabling reporting pursuant to Article 9 paragraph 2 of the Convention.

Regarding Section 17 of the Nature Diversity Act

The group of legal experts that was appointed in December 2024 to deliver an assessment of the relationship between Norway's legal obligations on preservation of large carnivores and indigenous peoples, delivered their report on March 5th 2026⁹. The conclusions in the report regarding the

provision on emergency culling in Section 17, second paragraph is¹⁰:

Section 17 of the Nature Diversity Act, as amended on 28 March 2025, provides that measures in self-defence may be undertaken “where this is deemed necessary due to an ongoing attack on semi-domesticated reindeer ... or where it is highly probable that such an attack is imminent.” The Committee is of the view that these requirements do not fully correspond to the conditions laid down in Article 9 of the Bern Convention. That provision establishes, as general conditions, that the killing of protected species must not jeopardise the survival of the population concerned and that such measures may be employed only as a measure of last resort. Where non-lethal alternatives are available, these must be applied in preference to lethal measures. Furthermore, acts undertaken in self-defence must not exceed what is strictly necessary to avert the attack. The requirement under Section 17 that self-defence must be “necessary” implies that non-lethal preventive measures take precedence. However, the Convention does not impose a requirement that an attack be highly probable. Rather, it should be understood as requiring a composite assessment encompassing both the degree of risk and the potential extent of damage. It should also be recognised that a broader scope for self-defence may be warranted in areas where reindeer husbandry is particularly vulnerable.

Currently, the Ministry is assessing the report and how the conclusions should be followed up. Regarding the provision for emergency culling, however, the Ministry’s understanding is that this report does not indicate that the provision for emergency culling is contrary to Bern Convention. Rather, the report indicates that Article 9 affords more discretion than currently reflected in Section 17, second paragraph, third sentence of the Nature Diversity Act, particularly in areas where reindeer husbandry is especially vulnerable. Should the Bureau wish for further elaboration on the considerations of the group of legal experts and the Ministry’s assessments, we remain at its disposal.

We want to emphasise that the situation after the amendment of Section 17 in 2025 is monitored closely, inter alia to assess whether the amendment warrants other adjustments in order to comply with the population targets adopted by the Parliament. The total number of instances where Section 17 has been invoked in relation to large carnivores over the last five years is relatively small¹¹, and there have not been any instances where the Section has been invoked since the amendment entered into force.

Other updates

The genetic status of the population

The average inbreeding coefficient, which reflects the level of inbreeding in the Scandinavian wolf population, was estimated at 0.24 (± 0.10 SD) for this winter’s family groups, representing an increase compared to last year (0.21 ± 0.09 SD)¹².

Norwegian authorities continue efforts to improve the genetic situation by protecting as far as possible immigrating individuals. Immigrating wolves occur more often in areas bordering Russia and/or Finland, and translocation of wolves from those border areas may be an alternative to lethal measures. There are aspects that needs to be considered in relation to the handling and translocation of such individuals, such as the possible risk of introgression of parasites and diseases to the population. The Norwegian Environment Agency has commissioned a risk assessment from the Norwegian Veterinary Institute on introgression of parasites and diseases to be delivered by mid-September this year, for inclusion in a revised routine for handling and possible translocation of genetically important wolves in Norway.

Dialogue with Swedish authorities

Norwegian authorities continue efforts to establish a closer dialogue with Swedish authorities on the management of our shared wolf population. A meeting between Norwegian and Swedish authorities on ministerial level regarding wolf management was held in March 2026.

Court proceedings

In December 2025 the organisation "Ulv i hele Norge" filed a lawsuit seeking a prohibition on issuing culling permits and requested a preliminary injunction to remain in effect until the case had been finally adjudicated by the courts. On December 17th, 2025, Oslo District Court dismissed the case, as the Court found that the case did not concern a legal claim in line with the requirements of the Norwegian Disputes Act. The organisation appealed the ruling from Oslo District Court. On February 26th, 2026, the Borgarting Court of Appeal dismissed the appeal. The organisation appealed the ruling of the Appeal Court to the Norwegian Supreme Court, which dismissed the appeal on April 24th, 2026.

Med hilsen

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Dokumentet er elektronisk signert og har derfor ikke håndskrevne signaturer

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