



Strasbourg, 18 November 2025

T-PVS/Files(2025)2022-3_Comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee
45th meeting
Strasbourg, 8-12 December 2025

Open File: 2022/03

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

- COMPLAINANT REPORT -

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Update Report November 2025:To:

Bureau of the Standing Committee of the Bern Convention
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14 November 2025

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

In reference to the letter of 27 October 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 ahead of the Standing Committee meeting taking place on 8-12 December 2025 in Strasbourg.

Summary

The Norwegian authorities have set the quota for licence hunting at 27 wolves in winter 2026. The aim of license hunting is to keep wolves out of 95% of the land territory of Norway. There will be no culling of wolves in the wolf management zone this winter. The Swedish authorities have announced that 48 wolves shall be culled in Sweden this winter. In winter 2025, the lowest number of wolf packs and wolf pairs since winter 2013/2014 was registered in Norway, being at 4,5 breeding wolf packs. In a recent report, the National Authority for Investigation and Prosecution of Economic and Environmental Crime (NAIPEEC) has highlighted poaching (illegal hunting) of large carnivores as one of the three most serious threats in the area of crime against nature. NAIPEEC notes that the wolf population has decreased significantly in recent years and considers that illegal hunting increases the risk of red-listed large predators becoming extinct in Norway. Research shows that government policy that has main focus on lethal control of large carnivores contributes to undermining the normative effect of the law aiming to protect and conserve these species. The Parliament in Norway has adopted a new Wild Resources Act that permits general use of drones and thermal sighting devices in the culling of large carnivores for damage control. Regarding the amendment of the clause on emergency culling in the Nature Diversity Act, the Complainants refer to the complaint by Birdlife Norway, submitted to the Bern Convention in June 2025. The Government of Norway has still not shown any willingness to introduce changes to wolf management.

1. The planned culling of wolves in winter 2025 outside the wolf management zone

The so-called license hunting of wolves (quota-based culling of wolves for population control) starts on 1 December 2025 throughout Norway, except in the small wolf management zone (wolf zone) that forms 5% of land territory of Norway. The regional large carnivore committees have adopted quotas for the culling of altogether **27 wolves** in the period of 1 December 2025 – 31 May 2026. If this quota is upheld by the Ministry of the Environment, **it will constitute 40% of the wolf population in Norway** which is assessed to be at around 59-66 wolves in 2024/2025, including wolves straddling between Norway and Sweden, and **57%** out of wolves found only in Norway (40-47 wolves).¹ In winter 2025, the lowest number of wolf packs and wolf pairs since winter 2013/2014 was registered in Norway – 4,5 wolf reproductions were registered in winter 2024/2025, of which 3 were found only in Norway.

No additional decision on culling is to be adopted with regard to wolves wandering into areas where culling quotas have been allocated. This means that all wolves detected in those areas can be shot, without the need to consider the concrete damage or potential for damage with regard to the specific wolf or wolves. The main legal ground for license hunting of wandering lone wolves and territory-marking wolf pairs outside the wolf zone is “to prevent damage to crops, livestock, domesticated reindeer, forest, fish, water or or other property”, as provided in section 18(1)(b) of the Nature Diversity Act. In certain areas in the southeastern part of Norway, the legal ground for license hunting is “to safeguard general health and safety interests or other public interests of substantial importance”, as provided in section 18(1)(c) of the Nature Diversity Act. These “certain areas” are found right next to the wolf zone. However, there is no such damage to and loss of grazing animals that gives ground for culling under section 18(1)(b). In relying on section 18(1)(c), the committees refer to zone-based

management and the need to practice it clearly and consistently, so that it would promote predictability that there are no wandering nor resident wolves in areas outside the wolf zone. The authorities assume that practicing zone-based management in a consistent manner creates trust towards the authorities and mitigates conflict.

The Complainants would once more like to refer to the statement made by prof. Arie Trouwborst on the negative zoning as practiced in Norway, in the court case between the Norwegian government and NOAH in 2021:

“Article 4, read in light of subsequent Resolutions and Recommendations, calls for conservation of the most important habitats for wolves in each country. If any negative zoning takes place at all, then one would also expect a sufficient number and size of protected areas for wolves, which are completely tailored to the species’ needs, and where the interest of wolf conservation takes precedence over other interests. Needless to say, a situation wherein the largest part of a country is declared off-limits to the species, and wolves are not even safe in the small areas designated for it, would seem to be incompatible with Article 4. ... It is for the authorities to demonstrate that the three conditions of Article 9 are met, on a case-by-case basis. Showing this in advance for the entire duration of the zone appears very difficult to do, for instance given uncertainty about how many wolves this will concern, in relation both to the conditions of alternatives and population status. ... I know of no other country that has practically excluded wolves from 95% of the territory. Norway’s policy seems to be unprecedented in this regard. ... To me, the position that the wolf zoning system and population target currently in place in Norway could somehow still be reconciled with Norway’s obligations under the Bern Convention, seems completely indefensible.”

The quota set for the license hunting of 27 wolves is very high. The data from previous years show that around 1/3 of the wolf population in Norway is killed during license hunting, but last year only 5 wolves were killed out of a quota of 43 wolves – of these four were culled in the wolf zone and one outside the zone. In addition to the five wolves killed during license hunting in 2025, two wolves were killed illegally in the wolf zone in January. This case is being investigated by the police, and ten people have been charged for committing a serious environmental crime or being an accomplice to this.² Another wolf pack of 8 animals disappeared without trace last winter. The number of wolves occurring outside the wolf zone is extremely low, and according to data, only 5-6 lone wolves were detected during the last reporting period.³ Every year, either the breeding female or breeding male disappear in several established wolf territories in the wolf zone, but it is not known how many wolves are killed illegally and how many have died of natural causes. However, The Norwegian Environment Agency pointed out in its expert assessment in 2024 that it has been more challenging to gather data on territorial wolves compared to previous years, and that the number of adult wolves disappearing between seasons is significant.⁴

The fact that the quota is set as high as the size of the wolf population itself shows the absurdity of the wolf culling policy (in 2025, the quota was at 43 wolves out of a population of 54-59 wolves of which 37-41 wolves were found only in Norway). **In effect, the wolf can be hunted freely on 95% of the land territory of Norway almost throughout the year.** In addition, setting such high quotas signals that wolves are not considered by the government a natural part of forests and landscapes in Norway, but a problem to be solved by culling.

2. Culling of wolves in the wolf management zone in winter 2026

The regional large carnivore committees have decided **not** to permit license hunting of wolves in the wolf zone in winter 2026. Since 2017-2018, culling of entire wolf packs has been an annual practice. The committees consider that opening for licence hunting in the zone, together with the culling of wolves for damage control in spring and summer next year, and other influencing factors, could be detrimental to the survival of the South Scandinavian wolf population in the long term. The committees noted that there is insufficient certainty as to whether the Norwegian population target of minimum four wolf reproductions (litters) shall be achieved in 2026, if wolf culling in the wolf zone was permitted.

The County Governor (acting as a secretariat to the regional committee) noted in the proposal to the regional committees that *“New knowledge about the population situation may become available nearer to the winter, which could call for a different assessment”*. The County Governor stated further: *“Some of the conflict is related to the wolf population having exceeded the population target or that active management is expected to keep the population within the population target. The Secretariat has pointed out in previous years that predictability and trust in management, which is based, among other things, on the population being managed*

*within the population target in line with the Storting's guidelines, cannot be achieved in any other way than by culling. According to the Secretariat's assessment, however, culling in the current population situation may build up the conflict to a greater extent than it contributes to conflict mitigation. **If the population increases again, conflict mitigation with regard to those who want active control of the population can be ensured through future decisions on license hunting.***" (Emphasis by the Complainants)

In the Complainants' view, the last quote from the County Governor's proposal summarizes the wolf culling policy in Norway in a nutshell. According to Norwegian authorities, culling of wolves is necessary to ensure predictability and to create trust in the authorities. The Complainants argue that culling has the opposite effect. By creating an expectation of population control as soon as the wolf population is above a politically pre-determined level strengthens the perception that wolves are not a natural part of forests and landscapes in Norway. Such a policy is counterproductive to promoting co-existence and helping local inhabitants adjust to the presence of the wolf. The Complainants refer to research by John D. C. Linnell who has warned against resorting to legal hunting as soon as the population reaches a certain number of animals. He states that *"it is not clear if hunting in such situations may not ultimately be detrimental to the recovery of small carnivore populations by reinforcing intolerance towards population growth"*.⁵ Government policy based on lethal control can also lead to less tolerance towards the wolf and contribute to increasing acceptance of illegal hunting.⁶

Furthermore, it is evident from the proposal (and the decisions from previous years) that the authorities fail to recognize the various causes of conflict when it comes to wolf management and instead focus on creating trust in the authorities by allowing population control. This assumption overlooks the many other reasons why some parts of society feel distrust towards authorities, reasons that have little or nothing to do with the wolf.⁷ An analysis conducted by Skogen and Krange in Norway (2020) concluded that *"Predator populations are increasing at the same time as rapid structural changes are transforming the Norwegian countryside. Resistance to predators must be understood as part of a more general resistance to a development in which a powerful (urban) middle class and elite are seen as the driving force. ... Analyses show that acceptance [for illegal killing of wolves] joins a broader pattern of controversies in Norwegian society, expressed by phenomena such as xenophobia, scepticism of anthropogenic climate change, anti-elitism and low confidence in institutions working to preserve Norwegian nature. Being a hunter or having wolves in the neighbourhood matters less."*⁸

3. Illegal hunting increases the risk of the wolf becoming extinct in Norway

In the threat assessment 2025, the National Authority for Investigation and Prosecution of Economic and Environmental Crime (NAIPEEC / Økokrim) has highlighted poaching (illegal hunting) of large carnivores as one of the three most serious threats in the area of crime against nature.⁹ NAIPEEC notes that the wolf population has decreased significantly in recent years and refers to research by the Swedish University of Agricultural Sciences (SLU), according to which illegal hunting is one of the two biggest threats to the wolf population in Sweden, in addition to the deterioration of genetic variation due to inbreeding. NAIPEEC considers that illegal hunting increases the risk of red-listed large predators becoming extinct in Norway. According to NAIPEEC, the practices of illegal hunting include hunting outside the established hunting season, using illegal weapons or other illegal methods, hunting in areas where it is prohibited, or chasing large predators from protection zones into zones where a permit for license hunting has been granted.

One of the undersigned, prof. Ragnhild Sollund at the Department of Criminology and Sociology of Law (Faculty of Law, University of Oslo), has researched the causes behind illegal hunting of large carnivores from a criminal sociological perspective over many years. She has found that a government policy with a focus on lethal control of endangered species contributes to undermining the norm-forming effect of the law aiming to protect and conserve the same species. Her comment on the NAIPEEC report on illegal hunting of large carnivores¹⁰ is added here as follows:

"To understand how license hunting and quota hunting encourage illegal hunting, one must understand the purpose and effect of the law. The law is intended to be norm-forming (Aubert 1954), in that the law gives guidelines for behavior and society's norms become consistent with the law, given that the laws are known, and violations are prosecuted. Violations of the law should be punished and are expected to have an individual and general preventative effect.

Norway has several laws that are relevant to illegal predator killings, such as the Nature Diversity Act, the Wildlife Act and the Animal Welfare Act. Norway has also committed to the Bern Convention and CITES – which are also relevant to the illegal hunting of endangered carnivores, not least because many hunt large carnivores to have them as trophies. In order for these laws and conventions to

actually have a norm-forming effect on those who could potentially consider violating their provisions, it is important that the state treats the laws in the same way that it expects its citizens to. The normative signal sent by Norway's membership in, for example, the Bern Convention is that wild animals and their habitats are protected by law, as the convention is implemented through the Nature Diversity Act.

Nevertheless, Økokrim's report seems to indicate that the legislation that exists to protect endangered species does not have the necessary normative effect. The review of verdicts in 2016 (Sollund 2016; see also Sollund 2020) showed that in several cases the same hunters who kill endangered predators illegally were also killing endangered predators with a permit from the state. This means that the state encourages hunters to kill animals of endangered species one moment, but the next moment will prosecute such killings.

The fact that the state allows hunting of endangered species undermines the normative effect of the law. License hunting rather encourages and legitimizes a view that these are animals to be killed and species to be exterminated, since the state itself distributes both quotas and permits for this type of hunting (Sollund and Goyes 2021). The normative effect of the law is undermined when hunters receive a license to kill endangered predators one day, but the next day are found guilty of serious environmental crime for the same act.

Despite the fact that the punishment for such offenses can be severe (up to five years under the Nature Diversity Act), the potential provided by the law is not used, and such offenses are generally punished with relatively mild penalties. They thus have little individual and general preventative effect (Sollund 2016; 2020a). A penalty that, in addition to deprivation of liberty, could have a deterrent effect is a permanent hunting ban and a ban on possession of weapons, which are instruments that are used, but only to a limited extent.

One point in Økokrim's report is that this form of crime is difficult to uncover, and rarely reported. This can be linked to another well-known criminological phenomenon, namely that crime in various forms is often practiced in subcultures, where people collectively encourage and neutralize crime using neutralization techniques (Sykes and Matza 1957). Neutralization techniques can be, for example: denial of responsibility, denial of injury, denial of the victim, condemnation of the condemners, and appeal to higher loyalties. In the context of illegal hunting, this would involve denying the victim's (wolf/bear/wolverine/lynx/eagle) intrinsic value, denying the nature of the crime, by saying that it is not really that criminal (the state does the same thing), condemning those who condemn (in this case the state/law/police/judges), and prioritizing protecting one's livestock, one's hunting interests, one's dogs, etc. rather than abiding by the law.

The state gives hunter subcultures of this kind, which also appear in the criminal case material (Sollund 2016), ample scope to apply all of Sykes and Matza's techniques to neutralize their crime, because the state itself allows hunting of endangered species and does not protect natural diversity. In such subcultures, one also finds collectors, who are motivated by trophy hunting, and this is unfortunately something the state encourages when they allow hunters to keep the animals they have killed under license.

The connection between the state's licensing of the killing of endangered predators and the illegal hunting is clear, and makes it difficult to preserve Norway's own endangered species."

Based on prof. Sollund's research, it can be argued that there is a connection between the government policy and political debate of recent years, which has consistently focused on the presence of wolves as a "problem" with very little focus on non-lethal solutions aimed at promoting co-existence, on the one hand, and extensive illegal hunting of wolves and other large predators on the other hand. A rise in poaching after allowing legal hunting of wolves has been shown to occur in the study by Santiago-Ávila et al. This is called facilitated poaching: "... would-be poachers respond to the policy changes as a signal to increase their activities, possibly associated with cognitive processes relating to values (e.g., lower value of wolves in the eyes of would-be poachers), social norms (e.g., greater acceptability of poaching, or less enforcement against poaching), or perceived control (e.g., would-be poachers perceive themselves helping authorities to kill wolves)."¹¹

4. The new Wild Resources Act permits general use of drones and thermal sighting devices in the culling of large carnivores, in breach of Article 8 of the Convention

In June, the Norwegian Parliament adopted a new Wild Resources Act that will replace the current Wildlife Act of 1981. The new law will come into effect on 1 July 2026. As to the prohibited means and methods of killing, capture and other forms of exploitation listed in Appendix IV to the Bern Convention, the new law has

integrated some of these prohibitions but allowed others. The Complainants would like to draw attention to the provisions in the new law that allow the use of drones (and other aircraft and motor vehicles) and thermal sighting devices in the culling of wild animals (including large carnivores)¹² for damage control. The relevant provisions read as follows:

Section 46. Culling for damage control

(1) To the culling of wild animals for damage control, the provisions of Chapters 1, 2, 4, Chapter 5 except Sections 26 and 29, Chapter 6 except Sections 38 and 41 and Sections 51, 58 and 60 of this Act apply, as well as regulations issued pursuant to these provisions. When trailing/searching for a wounded animal in connection with the culling of bears, wolverines, lynxes, golden eagles and wolves, Section 22, first, second, fourth, fifth and seventh paragraphs of this Act apply accordingly.

(2) The King may issue regulations on the implementation of culling for damage control, including that culling may be carried out without regard to the provisions mentioned in the first paragraph, and on assigning tasks to the municipality.

(3) The King may, by individual decision, deviate from the provisions mentioned in the first paragraph.

Section 26. Use of visible light and special sighting devices

(1) The use of light sources that provide visible light during hunting and trapping is prohibited, unless otherwise provided for by or pursuant to law. The same applies to the use of residual light-enhancing and thermal sighting devices and other sighting devices with technology that is intended to illuminate or improve the visibility of the surroundings or the game for the hunter.

(2) The King shall issue regulations on exceptions to the prohibition under the first paragraph for, among other things, the search for shot game, hunting of specific species and when it is deemed necessary to regulate the game population in specific areas.

Section 29. Prohibition on the use of aircraft, motor vehicles and motor vessels

(1) During hunting, it is prohibited to use

- a. aircraft or motor vehicles for pursuing game or for diverting the animal's attention from the hunter;
- b. aircraft or motor vehicles off-road for locating game;
- c. motorized vessels within a distance of two kilometres from land, including islets and reefs.

(2) The prohibition in the first paragraph, letter c, does not apply when searching for birds at sea pursuant to Section 22, provided that the speed of the vessel does not exceed 5 knots. The hunter has the burden of proof that the use is legal, and must promptly notify the police and the municipality of the use of a motorized vessel during the search.

Note the reference in section 46 to Chapter 5 that regulates how hunting and trapping shall be carried out. During the reading of the law in the Parliament, the wording “*except sections 26 and 29*” was added after the reference to chapter 5, with the result that the law now allows using aircraft or motor vehicles and thermal sighting devices during culling for damage control of wild animals. The Ministry of Agriculture and Food has confirmed in the letter of 2 July 2025 that section 46 together with section 29 allows the use of drones in the culling of large carnivores for damage control. The Complainants argue that these new provisions in the Wild Resources Act are in contradiction with Article 8 of the Bern Convention when it comes to species of wild animals protected under Appendices II and III to the Convention. Exceptions that allow the use of these prohibited means can only be made on the basis of case-by-case assessment according to Article 9 of the Bern Convention, and not as a general exception in all cases of culling for damage control.

5. Other comments

The Government has still not shown any willingness to introduce changes to wolf management after the Standing Committee decided to open a case-file on Norway's culling policy in December 2024. It is worrying that the proposal on the state budget for 2026 foresees a reduction of resources allocated to measures on conflict mitigation and large carnivores.

The South Scandinavian wolf population is categorized as “Vulnerable”.¹³ Despite this endangered status, the Swedish authorities have decided to decrease the wolf population in Sweden to 270 animals during the next licence hunting season. The county administrative boards in Sweden have recently announced that 48 wolves shall be culled in winter 2026. The ultimate aim is to reduce the number of wolves in Sweden gradually to 170 animals.

In October 2025, the Minister of Environment received a written question by a Parliament representative from the Green Party about Government's plans on measures to preserve the wolf, in light of the report by Økokrim (NAIPEEC) on the poaching of large carnivores, and the planned reduction of the wolf population in Sweden. The Minister replied with regard to the second part of the question: "... *There is no agreement between Norway and Sweden on the distribution of the wolf population, but the majority of the southern Scandinavian wolves are located on the Swedish side. I assume that our overall policy and management, including combating illegal wolf hunting, will continue to ensure the survival of the wolf in our areas, and if this should lead to the need for new assessments also on the Norwegian side, I will return with this issue to the Storting.*"¹⁴ As the Complainants have pointed out in their previous update report, decrease in the wolf population in Sweden should be compensated by increasing the wolf population in Norway, and such "new assessments on the Norwegian side" should be undertaken without further delay.

The Bureau has asked for more information about the amendment of the Nature Diversity Act allowing so-called emergency culling where "it is highly probable that an attack (on grazing animals) is imminent". The Complainants refer to the letter of 16 June 2025 and the complaint of 18 June 2025 sent to the Bern Convention by BirdLife Norway. BirdLife addresses in depth the specifics of the amendment and why they consider it to be in contradiction with the Bern Convention. The Complainants agree with BirdLife Norway that the amendment is not in line with the Bern Convention and the wording needs to be changed back to the original paragraph in the Wildlife Act, so that "emergency killing" is only permitted in situations where domestic livestock are "under direct attack".

6. Concluding remarks

The Complainants would like to reiterate that the downgrading of the wolf's protection status in the Bern Convention should have no effect on the status and content of our complaint, as long as Norway's wolf population remains critically endangered and thus clearly not in a satisfactory conservation status.

It is important that the government of Norway respects the decision of the Standing Committee and we would like to encourage the Standing Committee to call upon the government to introduce the following changes:

- 1) to increase the population target for the wolf so as to bring its conservation status to a satisfactory level that would allow the wolf to perform its ecological role in areas where it is present;
- 2) to take a greater share of responsibility for ensuring a viable South Scandinavian wolf population;
- 3) to take an overhaul of the zone-based management so that protection of important wolf habitats and migration routes throughout the country is ensured, including expanding the wolf management zone to allow the wolf to perform its ecological role;
- 4) to ensure strict protection of wolf packs and territory-marking pairs in the wolf management zone and in areas bordering the zone, and to abstain from culling wolves in the wolf management zone.

Yours Sincerely,

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¹ <https://rovdata.no/Ulv/Bestandsstatus.aspx>

¹ <https://www.okokrim.no/ti-personer-siktet-for-ulovlig-jakt-paa-fredet-rovvilt.6718015-549344.html>, 9 May 2025.

¹ Statusrapport Ulv i Norge pr. 31. mars 2025. Konklusjoner fra bestandsovervåking vinteren 2024-2025. Available at: <https://kudos.dfo.no/dokument/372970/ulv-i-norge-pr-31-mars-2025-konklusjoner-fra-b Bestandsovervåking-vinteren-2024-2025>

¹ See also the fifth update report by the Complainants, 14 February 2025.

¹ Linnell, J. D. C. (2013). From conflict to coexistence: insights from multi-disciplinary research into the relationships between people, large carnivores and institutions. *Istituto di Ecologia Applicata, Rome*. Available online at:

https://lcepub.nina.no/pdf/634994155738977342_Task%204%20Conflict_coexistence_FINAL_DEF.pdf

¹ Santiago-Ávila, F. J., Chappell, R. J., & Treves, A. (2020). Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Scientific reports*, 10(1), 1-14.

¹ Kaltenborn, B. P., & Brainerd, S. M. (2016). Can poaching inadvertently contribute to increased public acceptance of wolves in Scandinavia?. *European Journal of Wildlife Research*, 62(2), 179-188.

¹ Krange, O., & Skogen, K. (2020) Loven øst for Glomma. Support for illegal killing of wolves as an expression of political resistance. *Norsk sosiologisk tidsskrift*, 4(03), 165-180.

¹ <https://www.okokrim.no/ny-trusselvurdering-fra-oekokrim-kriminelle-profitterer-paa-miljoekriminalitet.6732548-549350.html>

¹<https://img8.custompublish.com/getfile.php/5456761.2528.npwuajkbtqbq7s/Ulovlig%2Bjakt%2Bp%C3%A5%2Brovvilt.pdf?return=www.okokrim.no>, September 2025.

¹ Santiago-Ávila, F. J., Chappell, R. J., & Treves, A. (2020). Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Scientific reports*, *10*(1), 1-14.

¹ The law uses the term “vilt” defined in section 3(a) as follows: “naturally wild terrestrial mammals, birds, reptiles and amphibians, including hybrids with other species, regardless of whether the animal lives or can live in the wild in Norway”.

¹ Boitani, L., Kaczensky, P., Alvares, F., Andrén, H., Balys, V., Blanco, J. C., ... & Patkó, L. (2022, November). Assessment of the conservation status of the Wolf (*Canis lupus*) in Europe. In *Report to Bern Convention—Convention on the Conservation of European Wildlife and Natural Habitats*.

¹ <https://stortinget.no/no/Saker-og-publikasjoner/Sporsmal/Skriftlige-sporsmal-og-svar/Skriftlig-sporsmal/?qnid=108856>

Update Report July 2025:

NOAH for dyrs
rettigheter

To:

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31 July 2025

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

In reference to letter of 15 May 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 the autumn 2025 Bureau meeting, addressing particularly the efforts, if any, that the government of Norway has made to follow up the decision by the Standing Committee, adopted on 6 December 2024, to elevate the status of the complaint to “Open File”.

Summary

Over the past four years, the South Scandinavian wolf population has declined 25-30%, and the wolf population in Norway is at the lowest level since 2014/2015 – only 4,5 wolf reproductions were registered in winter 2024/2025. In spring, the government adopted quotas for damage control hunting for the period 1 June 2025 – 15 February 2026, amounting in total to 30 wolves. So far, four wolves have been killed under these quotas. In at least six cases, the culling licence for damage control has been issued based on a mere observation of the wolf, and in other cases, the culling licence has been issued based on damage to 3-5 grazing animals. The Country Governors have not clarified the genetics of the wolves to be culled before issuing the culling licenses. A recent law amendment has weakened the legal protection of large carnivores by allowing so-called emergency culling where “it is highly probable that an attack is imminent”. The Swedish authorities have decided to decrease the wolf population in Sweden to 270 animals in winter 2026 and to 170 animals over the coming years. This will further increase the risk of extinction of the South Scandinavian wolf population that is already in a precarious state. The Ministry of the Environment has not shown any initiative to engage in dialogue with the Complainants. Instead of cooperating with environmental organizations to bring about necessary changes, the Ministry has focused on clarifying and proving to the Bern Convention that Norway’s wolf culling policy is in line with the Convention. It is important that the Norwegian government respects the decision of the Standing Committee. The downgrading of the wolf’s protection status should have no effect on the status and content of the complaint, as long as Norway’s wolf population remains critically endangered and thus clearly not in a satisfactory conservation status.

1. The status of the wolf population

According to the report on the population status of the wolf in winter 2024-2025, published on 1 June 2025, 59-66 wolves were detected in Norway, of which 40-47 were found in Norway and 19 were found on both sides of the national border with Sweden. Both the subpopulation in Norway and the population in Sweden have been decreasing since 2021/2022. Over the past four years, the South Scandinavian wolf population has declined 25-30%. This development has brought the population to the level of 2012/2013 and is estimated to be at around 375 wolves. The estimated average inbreeding coefficient was 0,21 this winter, a slight decrease compared to last year’s monitoring season (0,23).¹⁵

In Norway, 4,5 wolf reproductions were registered in winter 2024/2025, of which 3 were found only in Norway. This is a decrease compared to previous years: in 2023 and 2022, 6,5 and 6 reproductions were registered, respectively. It is the lowest number of wolf reproductions in Norway since 2014/2015. According to the renowned wolf researcher Petter Wabakken, the current decline in the wolf population could lead to the population being below the population target within one year.¹⁶

2. Culling of wolves in spring and summer 2025

The so-called license hunting of wolves ended on 31 May 2025, and altogether 5 wolves were culled for population control.

This spring, quotas for damage control hunting for the period 1 June 2025 – 15 February 2026 were adopted, amounting in total to 30 wolves. The purpose of damage control hunting is to deal with ongoing situations of damage to grazing animals and domesticated reindeer. It is the County Governors in 8 regions who can adopt decisions on the culling of wolves within the allocated quotas. So far, four wolves have been killed under these quotas.

The Complainants would like to inform the Bern Convention that at least in six cases this spring and summer, the culling licence for damage control was issued based on mere presence of the wolf, either proved by observation on wildlife camera, visual sighting or finding remains of predated wild animals (moose). **No wolf attacks of grazing animals had been observed nor documented at the time of issuing of any of the licences.**

For example, the County Governor of Innlandet issued on 21 July a culling license based on the following: *“When the application for the culling license was submitted on 20.07.2025, there was only one wildlife camera image of the wolf and no documented damage. ... Experience from previous years shows that wolves staying in grazing areas for domestic reindeer can cause extensive damage in a short time. There are about 3,000 domestic reindeer grazing in the area, with a large number of calves. The County Governor therefore considers that the potential for future damage is large if the wolf continues to stay in the area. ... ”*. Other non-lethal preventative measures were considered “inappropriate” or “practically impossible to implement”, as these measures would not sufficiently prevent damage. The County Governor issued another culling licence on 3 July based on a discovery of a moose calf that had been killed and eaten by a wolf. The County Governor stated that *“The most effective measure to prevent damage would be to not send animals to outfield grazing”*, but considered that *“These are invasive measures that place strong restrictions on the use of the area as grazing land”*, and authorized culling instead.

On another occasion, the culling licence was issued after two grazing animals were documented to have been killed by a wolf: *“The wolf has taken an ewe and a lamb on the outfield pasture. There are already some animals on the outfield pasture and a release of more animals on the outfield pasture is planned this weekend and next week. If the wolf remains in the area, there is already a potential for damage, and the potential for damage will only increase in the days ahead.”* In other similar cases, a culling licence has been issued based on damage to 3-5 grazing animals.

These damages can hardly be characterized as “serious damage” according to Article 9 of the Bern Convention. Wolves are on the move in search of a mate and food in this time of year and can leave an area the next day, especially if appropriate deterring measures are implemented. However, the County Governors have failed to consider other non-lethal and long-term solutions; the condition that there is no other satisfactory solution is practically made redundant by referring to the geographically differentiated management according to which no wolves are allowed on 95% of the land territory of Norway.

Furthermore, it is alarming that in the culling decisions, the Country Governors have not clarified the genetics of the wolves to be culled before issuing the culling licenses. The Environment Agency emphasized in its assessment “Knowledge base for wolves in Norway June 2025” that culling licenses

can only be issued if the survival of the so-called genetically important individuals is ensured. This precondition has not been followed up by the County Governors.¹⁷

It is a common practice that the County Governor issues an oral licence over the phone to the relevant applicant and the hunting starts almost immediately after that. A written decision is formulated and published a few days later. This means that environmental organisations and other interested parties have no opportunity to challenge the culling decision, because in most cases, information about the culling license is made available only after the hunt has already been executed.

The Norwegian authorities practice damage control hunting as if parliament's decision on geographically differentiated management is itself an independent ground for culling. As shown above, the authorities set aside or only formally address the legal conditions that should be satisfied according to law and the Bern Convention in order to permit culling. This has led to a situation where substantive case-by-case assessments are not made, except only in a few cases. Most culling decisions lack any substantive grounds and justifications and are aimed at keeping 95% of the Norwegian territory free from wolves.

3. Law amendment on emergency culling of large carnivores

The Complainants would like to inform the Bern Convention of the recent amendment of Nature Diversity Act that came into effect on 1 April 2025. According to this amendment, the owner, or someone acting on behalf of the owner, may kill large predators when it is deemed necessary due to an ongoing attack on cattle, domestic reindeer, pigs and poultry, or because it is highly probable that such an attack is imminent. The amendment widened the scope of so-called emergency culling where "attack is imminent" was replaced with "it is highly probable that such an attack is imminent". The assessment of this latter condition is to be made by the owner, or someone acting on behalf of the owner. Allowing emergency culling based on a subjective assessment and where preventative measures have not been exhausted weakens the legal protection of large carnivores and can result in the increased killing of large carnivores. In the Complainants' view, this amendment of the Nature Diversity Act is in contradiction with the Bern Convention.

4. Recent developments in Sweden

The wolf is categorized as critically endangered on the Red List of Species 2021 in Norway and as endangered on the Red List of Species in Sweden. The South Scandinavian wolf population is categorized as "Vulnerable".¹⁸ Despite this endangered status, the Swedish authorities have decided to decrease the wolf population in Sweden to 270 animals during the next licence hunting season in winter 2026. The ultimate aim is to reduce the number of wolves in Sweden gradually to 170 animals. This number shall also be reported as the Favorable Reference Population (FRP) of the Swedish wolf population to the Commission of the European Union according to the EU Habitats Directive.¹⁹

Such a severe reduction further increases the risk of extinction of the South Scandinavian wolf population that is already in a precarious state. A population of 170 wolves cannot be considered as sustainable in the long-term, taking into account the significant inbreeding depression of the South Scandinavian wolf population and the high level of illegal hunting. In Dalarna region, the wolf population has more than halved in two years, and in Värmland, it has decreased from 130 to 45 wolves during the same period. Researchers have not found any explanation for this dramatic decline and believe that illegal hunting is probably one of the factors behind it.²⁰

The authors of the report that has been used by the Swedish authorities as the scientific basis for the reduction of the population, have issued a joint statement. According to Miller and Dussex, they have "*explore[d] the demographic conditions that are necessary to promote viability of the wolf population in Sweden as embodied in the general concept of minimum viable population (MVP) size*", but that "*The actual population size required to achieve that favorable status, moreover, will be larger than the estimated minimum viable population size*". They added that "*Additional analyses beyond the scope of*

the present demographic/genetic modeling efforts are required to implement this upscaling. These added analyses will likely include habitat suitability modeling, and considerations of landscape-level genetic, geographical and climatological factors that would influence the capacity of wolves to serve their proper ecological role in Sweden over the next century and beyond".²¹ To the knowledge of the Complainants, no such "additional analyses" exist.

In order to prevent a greater extinction risk of the South Scandinavian wolf population, the planned decrease in the wolf population in Sweden should be compensated by increasing the wolf population in Norway. The Complainants ask the Bern Convention to investigate this matter further, especially the issue of Favorable Reference Population, in cooperation with the representatives of Sweden and the EU, and to take necessary action to ensure that the conditions for the favorable / satisfactory conservation status of the wolf in Sweden and Norway are met.

5. Contact with the Ministry of the Environment on the case-file

NOAH sent a letter to the Prime Minister, the Ministry of Climate and the Environment and the Ministry of Foreign Affairs on 15 January 2025, expressing concerns about the government's dismissive reaction towards the decision of the Standing Committee to open a case-file on Norway's wolf culling policy. In this letter, NOAH asked about government plans to follow up on the decision soon and called upon the government to engage environmental organisations in this process.

At the request of NOAH, a meeting was held in April between the Minister of the Environment and five environmental organisations, including WWF Norway and BirdLife Norway, to discuss issues raised in NOAH's letter of 15 January and to communicate once more the urgency of bringing the government's wolf policy in line with the requirements of the Convention. Unfortunately, the meeting was not constructive; the Minister stated that the Norwegian government is not in breach of the Convention, and it continues with its current policy, based on the political guidelines by the parliament and the judgments of Supreme Court in the two wolf cases.

The Minister sent an official reply to NOAH's abovementioned letter at the end of May where the Ministry reiterated that opening of the case-file does not have any legal effect on the wolf management in Norway; he also underlined the importance of having a dialogue with the Bureau and the Contracting Parties to the Bern Convention on the case-file. However, it seems that the Ministry has decided to focus on clarifying and proving to the Bern Convention that Norway's wolf culling policy is in line with the Convention and is not willing to introduce any changes to the wolf management and culling policy in Norway.

6. Concluding remarks

The Standing Committee emphasized in its decision of 6 December 2024 that despite of the downgrading of the wolf from Annex II to Annex III of the Bern Convention, "*wolf populations need to be kept out of danger and measures to be taken shall include the temporary or local prohibition of exploitation, as appropriate, in order to restore satisfactory population levels*".²² The downgrading of the wolf's protection status should have no effect on the status and content of our complaint, as long as Norway's wolf population remains critically endangered and thus clearly not in a satisfactory conservation status.

The Court of Justice of the EU ruled in 2024 that "*the favourable conservation status of the animal species concerned must exist and be assessed, in the first place and necessarily, at local and national level, so that an unfavourable conservation status in the territory of a Member State or a part thereof is not hidden by the effect of an assessment carried out solely at a cross-border level which would show that that species is at a favourable conservation status*".²³ The same principle should apply in the Norwegian case, to finally put a stop to a management policy that is based on "free-riding" on the Swedish wolf population and the management efforts made there. We encourage the Bern Convention to provide a forum where case law developed by the Court of Justice of the EU can be discussed, with

a view to developing a common understanding of certain aspects concerning management of transboundary populations of large carnivores between EU and non-EU Member States. The newly revived Group of Experts on Large Carnivores could also address this topic in more detail, provided that a legal expert qualified in international and EU law is involved in the process.

The Norwegian government argues that culling of wolves is necessary to mitigate conflict and to ensure predictability; however, the wolf culling policy has the opposite effect – instead of promoting co-existence and helping local inhabitants adjust to the presence of the wolf, the government presents extensive culling as its official conservation policy. It thus reinforces the perception that wolves are not a natural part of forests and landscapes in Norway which in turn can lead to less tolerance towards the wolf and contribute to increasing conflict and illegal hunting.

It is important that the Norwegian government respects the decision of the Standing Committee and without further delay adopts measures that ensure that: 1) the wolf is not critically endangered in Norway; 2) Norway takes a greater share of responsibility for ensuring a viable Scandinavian wolf population.

Yours Sincerely,

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Update Report February 2025:To:

Bureau of the Standing Committee of the Bern Convention
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14 February 2025

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

In reference to the letter of 20 December 2024 by the Secretary of the Bern Convention, complainants NOAH – for animal rights, Margareth Konst, asst. prof. Stefanie Reinhardt and prof. Ragnhild Sollund (referred to as “the Complainants”) are hereby submitting an update report to the spring 2025 Bureau meeting, addressing particularly the efforts, if any, the government of Norway has made to follow up the decision by the Standing Committee, adopted on 6 December 2024, to elevate the status of the complaint to “Open File”. In the decision, the Standing Committee established that Norway is in breach of Article 9 of the Convention and called upon the government of Norway to abstain from culling entire wolf packs and territory-marking pairs in the wolf zone. It also expressed strong concern with the extremely restricted population target and invited the government of Norway to prioritise proven, non-lethal measures of damage reduction and conflict mitigation, and to step up the promotion of long-term co-existence between humans and wolves based on the available best practice.

Summary

*The Norwegian government authorized culling of wolf packs and territory-marking pairs in the wolf zone also this winter and the so-called license hunt for population control has until now resulted in the culling of 6 wolves out of a **total culling quota of 43 wolves**. The wolf population in Norway is at **54-59 wolves** as of 5 February 2025. The government has stated that the decision of the Standing Committee on the opening of a case-file does not give a ground for changes in Norway’s wolf management and that its wolf culling policy is in accordance with the Bern Convention. The NGOs tried to stop the license hunt in the wolf zone by applying for a preliminary injunction at the court, based on the decision of the Standing Committee. This was initially granted but later revoked by the court. The government argued at the court proceedings that the decision on the opening of a case-file does not establish that Norway is in breach of the Bern Convention; furthermore, the decision has no legal significance for the management of wolves in Norway, because the Committee lacks the competence to issue authoritative interpretations of the Convention and there is no legal analysis of Norway's international obligations in the decision. By authorizing yet another culling of wolves in the wolf zone, the Ministry has used its discretionary powers beyond what the Supreme Court has ruled to be within the limits of the law and set aside scientific data and expert assessments. There is no indication that the government intends to change the course of its wolf culling policy. In the Complainants’ view, Norway continues to breach Articles 2, 4, 6 and 9 of the Bern Convention.*

1. License hunting of wolves in winter 2024/2025 and an update on the wolf population

As highlighted in the Complainants’ update report of 4 November 2024, the regional large carnivore committees in Norway had adopted quotas for population control (license hunting) of wolves in the wolf zone (12 wolves) and outside the wolf zone (27 wolves, mostly lone vagrant wolves, but also territory-marking pairs) in winter 2024/2025 and spring 2025, making the total quota for population control in Norway at **39 wolves**. These quotas were challenged by environmental organizations but upheld by the Ministry of Climate and the Environment (hereinafter *the Ministry*).²⁴

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NOAH sent a letter to the Ministry on 6 December 2024, encouraging to follow up the newly issued decision of the Standing Committee “to abstain from culling entire wolf packs and territory-marking pairs in the wolf zone”. The Ministry nevertheless adopted a decision on 20 December on the culling of two wolf packs and any remaining wolves in a third pack and thereby confirmed the total quota for the culling of 12 wolves in the wolf zone, with the possibility to increase the quota in case more wolves are detected in the relevant wolf territories.

The wolf culling in the wolf zone lasts until 15 February, and per 14 February, 4 wolves have been killed; the wolf culling outside the wolf zone started on 1 December 2024 and lasts until 31 May; so far, 2 wolves have been killed.

In the north of the country (Troms and Finnmark), the regional large carnivore committee adopted on 24 January 2025 a quota for license hunting of four wolves in the period of 15 March – 31 May, **increasing the overall quota for the license hunting of wolves to 43.**²⁵

This is the first time that hunting of wolves for population control has been authorized in this part of the country; until now, culling of wolves has been authorized for damage prevention. In the decision, the regional committee states that although wolves to be culled are most likely genetically important wolves of Finnish-Russian origin, “*in this case it is not possible to exempt genetically valuable individuals from license hunting*”. The regional committee assessed that “*There is very little possibility that these [wolves] will migrate to the Scandinavian population themselves*” and that “*Further south in Finland, individuals from the Finnish-Russian population have a significantly shorter and easier path to the Scandinavian population*”. This conclusion is not based on scientific evidence since it is proven that wolves are capable of wandering long distances. The decision, therefore, is clearly aimed at removing any wolves that happen to be in the area, in order to prevent wolves settling permanently. In addition, the regional committee seems to indicate that only genetically important wolves coming to Norway through Sweden should be protected. This is in breach of the agreement of 2011 between Sweden and Norway on the management of genetically important wolves. It is yet another step towards weakening the protection of wolves in Norway. It is also a further attempt to shift a greater part of responsibility for the South Scandinavian wolf population to Sweden.

It is also important to mention that license hunting in Sweden this winter has resulted in the culling of 5 wolf packs and reduced the South Scandinavian wolf population by another 25 wolves, in addition to wolves culled in Norway.

The most recent update on the number of wolves in Norway was issued on 5 February 2024.²⁶ So far this winter, a total of **54-59 wolves** have been surveyed in Norway, of which **37-41 wolves only in Norway**, and 17-18 wolves shared between Norway and Sweden. Wolves killed this winter have not been discounted from this number. One wolf pack of eight animals has disappeared since it was last registered in March 2024, and poaching is considered to be the most probable cause.²⁷ Altogether 4,5 (four and a half) reproducing wolf packs have been registered.²⁸ Compared to winter 2023/2024, these numbers show a further reduction in the wolf population in Norway.

2. The Ministry has publicly challenged the decision of the Standing Committee

The government of Norway has not issued any public statement about the opening of a case-file on Norway’s wolf culling policy by the Standing Committee on 6 December 2024. However, the Minister of the Environment at the time, Mr. Tore O. Sandvik commented on the Standing Committee’s decision to the national broadcasting as follows: “*The government's view is that we are fulfilling our obligations under the Bern Convention. This is also the assessment of the Supreme Court. In addition, we have clear guidance from the Storting [Parliament] on how wolf management should take place.*”²⁹ The Minister added that the government will further clarify the matter. So far, no clarification has been made.

The Minister has stated to other sources that the opening of a case-file against Norway at the Bern Convention has no direct consequences for Norway's wolf policy.³⁰

In contrast, the Ministry issued an immediate press release on the Committee's decision on the downlisting of the protection status of the wolf in the Bern Convention, dated 5 December 2024, where it was stated that Norway still has an obligation to ensure the survival of the wolf in Norway, and to contribute to ensuring the survival of the wolf population in Scandinavia within the framework of a restrictive large carnivore policy. The Minister made the following statement:³¹

"We must investigate in more detail what significance a changed level of protection for wolves under the Bern Convention may have for Norway's management of wolves."

At the same time, the (then) Minister of Finance – Mr Trygve Slagsvold Vedum of the Centre Party, gave the following statement to media at an event organized by a local farmers' association to celebrate the downgrading of the wolf at the Bern Convention: *"This is a big victory for Norwegian communities. The wolf now has the same protection status as the shrew. Of course, we have to celebrate with a little party and cake. We get more national freedom of action and now we can remove wolves faster. This is an emotional moment, because we have heard many times that it is impossible to change the Bern Convention. Now we have made it happen."*³²

The Parliament representative from the Liberal Party of Norway Mr Ola Elvestuen posed a written question to the Minister of Climate and the Environment on 6 January 2025 and asked for a clarification why the government did not follow up on the decision of the Standing Committee of the Bern Convention and instead authorized culling of wolves in the wolf zone. He also asked how the government plans to follow up on the Committee's decision. The Minister gave the following reply on 13 January:³³

*"My view is that the current practice for regulating the population of wolves is in accordance with Norway's obligations under the Bern Convention. I refer to the fact that decisions on license hunting of wolves have been considered by the Supreme Court on two occasions, in 2021 and 2023. The legal conditions for license hunting of wolves, both outside and in the wolf zone, have been largely clarified through these judgments. The interpretation of the international law obligations under the Bern Convention was a key issue, particularly in the judgment of 2021. In both cases, the Supreme Court found, based on a thorough review and in line with international law interpretation principles, that the decisions to allow license hunting were in accordance with obligations under the Bern Convention. **In my view, neither the committee's decision itself nor the reasoning therein undermines the Supreme Court's assessments and conclusions.***

At the same time, I take seriously the fact that the Bern Convention's Standing Committee has opened a case-file regarding Norwegian wolf culling policy, and consider it of great importance to have a dialogue with the Convention's Bureau and the Standing Committee on the matter. Norway has been asked to submit the requested information and any other updates to the Convention's Bureau in February 2025. Norwegian authorities will provide such information and assessments to further describe our management and clarify our view."

(Our emphasis)

3. The government attorney questioned both the competence and conclusions of the Standing Committee at Oslo District Court

As stated above, the Ministry adopted a decision on the license hunting of 12 wolves in the wolf zone on 20 December 2024, with the planned start of the hunt on 1 January 2025. In the decision on license hunting, the Ministry has not provided any grounds for why it decided to ignore the decision of the Standing Committee, except for a general statement that the opening of a case-file does not give any grounds to change the policy on wolf culling as it has been considered by the Supreme Court to be in accordance with Norwegian law and the Bern Convention.

NOAH together with NGO Association *Our Predators* requested for a preliminary injunction at the Oslo District Court, referring to the decision of Standing Committee of the Bern Convention, and the

very low population of 6,5 breeding wolf packs registered in June 2024. The request for preliminary injunction was temporarily granted on 23 December 2024, thereby postponing the start of the license hunting until the final decision on the request for preliminary injunction was made. A court hearing on the request took place on 8 January 2025.

At the court hearing, the government attorney argued on behalf of the Ministry that the decision on the opening of a case-file does not establish that Norway is in breach of the Bern Convention, and went as far as to question both the formal and substantive competence of the Standing Committee to issue authoritative interpretations of the Convention. According to the government attorney, the Standing Committee can only give recommendations to the Contracting Parties and challenged the Committee's decision due to lack of legal analysis of the relevant Convention articles, especially the relationship of Article 2 with Article 9, based on the method of interpretation of international law, as embodied in the Vienna Convention on the Law of Treaties. The government attorney concluded that as the Committee's decision is not based on an authoritative legal analysis of Norway's international obligations, it has no legal significance when it comes to the wolf management in Norway.

On 20 January 2025, the Oslo District Court revoked the decision on preliminary injunction and concluded that the Ministry's decision is in accordance both with the Nature Diversity Act and the Bern Convention. The court provided the following grounds for its decision:

“The Committee has not provided any further justification for why and on what basis it believes that Norway is in breach of the Bern Convention, Art. 9. Without this being decisive, the court notes that it is somewhat unclear whether the Standing Committee of the Bern Convention has taken a final position on whether there has been a breach of the Convention. It also appears somewhat unclear whether statements/decisions from the Committee are recommendations on "best practice" or expressions of how the Convention should be correctly interpreted. The decision, according to its wording, bears the hallmark of being a call to Norway and a statement of concern related to wolf management in Norway, and can hardly be understood as an expression of state practice. The Committee does indeed point out that a norm that is based on public interests without a sufficient assessment of alternative means to wolf culling is in breach of the Bern Convention. However, there is no legal analysis of this issue, and the Supreme Court has concluded in both wolf culling judgments that the Ministry has sufficiently considered alternatives to wolf culling. The Committee is not a court and does not issue any binding decisions to Norway related to the issue of whether a national law is in conflict with the Convention or how the Nature Diversity Act should be interpreted.

In the court's view, the committee's decision to open a case-file against Norway for violation of the Bern Convention does not in itself have any place as an authoritative source of law in Norwegian law. Statements from the committee may carry arguments and analyses of the international legal sources, but as mentioned above, that is not the case here. It is a clear weakness of the Committee's decision to open a case – if the Committee intended to express how the Convention should be correctly interpreted – that it does not address the legal content of the discretionary conditions in Articles 2 and 9 of the Bern Convention. The Court leaves it open whether the assessment would be different on this point if the Committee had pointed to specific sources of law that support a specific interpretation of the wording of the aforementioned articles – sources of law that cannot be found in the Supreme Court's assessment in the wolf culling judgments or that are given different weight by the Supreme Court.

...

It is the court's view that the Supreme Court's assessment in the wolf culling judgments of 2021 and 2023 is still an expression of current law when it comes to the understanding of the Nature Diversity Act, Section 18, letter c. The opening of a case-file against Norway under the Bern Convention does not change this. In the court's view, the decision of the Standing Committee of the Bern Convention is not an expression of a legal development in this area and cannot be understood as undermining the Supreme Court's interpretation of the Nature Diversity Act and Norway's international law obligations, provided in the wolf culling judgments.”

The Complainants are very disappointed that the government has actively and publicly challenged the decision of the Standing Committee. The government has not only ignored the decision of the Standing

Committee but also created confusion about the content and meaning of the Committee's decision and the Convention's case-file system among the public.

4. The Government has continued its current wolf culling policy with no indication of intent to introduce changes or cooperate with the Complainants

After the license hunting of wolves in winter and spring 2024, only around 40 individuals were registered in Norway, bringing the number of wolves in Norway to the lowest level in the last 10 years. As of 1 June 2024, merely five wolf packs were registered in Norway and three in the border area (which means 6,5 wolf packs in Norway).³⁴ This is clearly not above the population target "with a relatively good margin" that the Supreme Court has established as a precondition to resorting to the "room for maneuver" (discretion).³⁵

This year, the Ministry again authorized culling of wolves in the wolf zone despite the warning by the Norwegian Environment Agency that the wolf population could end up at the lower end of population target of 4-6 wolf packs after culling. In the Complainant's view, the Ministry has used its discretionary powers beyond what the Supreme Court has ruled to be within the limits of the law and set aside scientific data that speaks clearly against authorizing any culling of wolves in the wolf zone.³⁶ The Ministry has also failed to take proper account of the high level of poaching.

The Norwegian Environment Agency pointed out in its expert assessment that it has been more challenging to gather data on territorial wolves during the last monitoring season, compared to previous years, and that the number of adult wolves disappearing between seasons is significant. Due to high inbreeding and a high level of poaching,³⁷ the Agency recommended maintaining the population at the upper end of the population target of 4-6 wolf packs. The Agency concluded that the culling of one wolf pack on Norwegian territory and one wolf pack in the border territory would most likely cause the population to be at the lower end of the population target next season. The Agency also warned against the culling of the newly established wolf pack Risberget-Ulvåa due to the reduced likelihood of achieving the target of 3 litters in Norway next season. However, this expert assessment was set aside by the Ministry in its decision of 20 December: "*The Ministry cannot see that it is essential that the population is managed each year with the aim of keeping it in the upper range of the target, as long as the population is managed so that it is within the interval target of 4-6 annual litters. The Ministry also refers to the consideration of not overruling the decisions of the regional committees on large carnivores, where there is legal and factual scope for this.*"

Regarding the territory-marking wolves in the border area of Boksjø, the Swedish authorities expressed concern over the decision to kill the wolves as there were no grazing animals in the area and the wolves were shy; however, they decided not to oppose the culling on the Norwegian side of the border. The Norwegian Environment Agency was clear in its call not to authorize the culling of border packs only on the Norwegian side as it splits up the wolf pack and may increase the risk of culling unknown (and potentially genetically valuable) individuals. They also pointed out that the female wolf in Boksjø is genetically one of the healthiest individuals in the Norwegian wolf population (F2-individual, with an inbreeding coefficient of 0,075). The Complainants consider that this fact alone should have been a ground for abstaining from culling the wolves in the border pack of Boksjø, taking into account the very precarious genetic situation of the South Scandinavian wolf population. However, the Ministry writes in the decision: "*The Ministry considers that it speaks against opening up for license hunting that the wolf is an endangered species in Scandinavia, and that the Norwegian part of the South Scandinavian population is red-listed as critically endangered. The population is relatively small and isolated with major genetic challenges. At the same time, these interests weigh less heavily due to the fact that the population target for the wolf population has been reached.*"

The reasons provided in the decision for the culling of wolves on the grounds of "public interests of significant importance" are very similar and in most part identical to the ones provided in the previous years' decisions.³⁸ The Complainants would like to point out that during the last three years the government has been crystal clear about the aim of culling entire wolf packs – that is to actively curb

population growth and to keep the population down within the population target, at a critically endangered level. The government attorney argued in the court on behalf of the Ministry that the annual culling of wolves in the wolf zone is important to have control over the growth of the population and that keeping the population down at the politically agreed 4-6 annual reproductions (litters) of wolves is necessary to ensure predictability and trust in the wolf management. He stated that the wolf (management) zone is not meant to provide strict protection to wolves but is merely a management tool for achieving the politically agreed population target. Thus, the government has openly admitted that Norway does not provide any strict protection to wolves on any part of its territory and is only guided by the political aim of maintaining a small fraction of 40-60 wolves of the Scandinavian wolf population on its territory.

When it comes to the requirement of finding other satisfactory solutions, the decision establishes that although non-lethal measures can have some effect, culling is necessary in the wolf zone as there are still negative effects *“related to conflict and reduced trust if the wolf population is above the population target”*. In this regard, the Ministry provides no further explanation and simply refers to the judgment by the Supreme Court where the court stated: *“If it is assumed that culling will strengthen trust in large carnivore management and increase predictability for people [outside the wolf zone], it is not easy to see how this can be achieved in any other satisfactory way.”* The condition of “there is no other satisfactory solution” is therefore considered to be fulfilled by a mere assumption, and no real and concrete (case-by-case) consideration of this condition is undertaken.

The Ministry has not contacted the Complainants to discuss the decision of the Standing Committee nor given any indication of intentions to change the course in the current wolf culling policy. The amended Regulation on Prevention and Conflict Mitigation Measures, mentioned in our previous report, came into force on 1 January 2025, and unfortunately did not take on board any of the proposals by NOAH to include information and communication measures as essential means to achieve the aims of the Regulation, in line with target 4 of the Kunming-Montreal Global Biodiversity Framework to “effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence”.

Conclusion

In the Complainants’ view, Norway continues to be in breach of Articles 2, 4, 6 and 9 of the Bern Convention by conducting a wolf culling policy where the wolf is kept out of 95% of Norway’s land territory, on the grounds of Article 9(1) indent b and indent c (“overriding public interests”) and kept at a low level of 4-6 reproductive wolf packs, on the grounds of Article 9(1) indent c. It is a policy where the wolf is presented as an unwanted species and subjected to heavy culling, resulting in the killing of up to 30% of wolves in Norway every year. The Complainants view the government’s reluctance to consider any changes to its wolf culling policy as a sign of disrespect towards legally binding international agreements on nature conservation and shows that the Norwegian government has taken the approach of cherry-picking when it comes to the Bern Convention, i.e. following up on its obligations in relation to certain species, but disregarding them in relation to others, such as the wolf, in order to continue its “restrictive” management policy.

Yours Sincerely,

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¹ <https://rovdata.no/Ulv/Bestandsstatus.aspx>

² <https://www.okokrim.no/ti-personer-siktet-for-ulovlig-jakt-paa-fredet-rovvilt.6718015-549344.html>, 9 May 2025.

³ Statusrapport Ulv i Norge pr. 31. mars 2025. Konklusjoner fra bestandsovervåking vinteren 2024-2025. Available at: <https://kudos.dfo.no/dokument/372970/ulv-i-norge-pr-31-mars-2025-konklusjoner-fra-b Bestandsovervåking-vinteren-2024-2025>

⁴ See also the fifth update report by the Complainants, 14 February 2025.

⁵ Linnell, J. D. C. (2013). From conflict to coexistence: insights from multi-disciplinary research into the relationships between people, large carnivores and institutions. *Istituto di Ecologia Applicata, Rome*. Available online at:

https://lci epub.nina.no/pdf/634994155738977342_Task%204%20Conflict_coexistence_FINAL_DEF.pdf

⁶ Santiago-Ávila, F. J., Chappell, R. J., & Treves, A. (2020). Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Scientific reports*, 10(1), 1-14.

⁷ Kaltenborn, B. P., & Brainerd, S. M. (2016). Can poaching inadvertently contribute to increased public acceptance of wolves in Scandinavia?. *European Journal of Wildlife Research*, 62(2), 179-188.

⁸ Kränge, O., & Skogen, K. (2020) Loven øst for Glomma. Support for illegal killing of wolves as an expression of political resistance. *Norsk sosiologisk tidsskrift*, 4(03), 165-180.

⁹ <https://www.okokrim.no/ny-trusselvurdering-fra-oekokrim-kriminelle-profitterer-paa-miljoekriminalitet.6732548-549350.html>

¹⁰ <https://img8.custompublish.com/getfile.php/5456761.2528.npwuajkbq7s/Ulovlig%2Bjakt%2Bp%C3%A5%2Brovvilt.pdf?return=www.okokrim.no>, September 2025.

¹¹ Santiago-Ávila, F. J., Chappell, R. J., & Treves, A. (2020). Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Scientific reports*, 10(1), 1-14.

¹² The law uses the term "vilt" defined in section 3(a) as follows: "naturally wild terrestrial mammals, birds, reptiles and amphibians, including hybrids with other species, regardless of whether the animal lives or can live in the wild in Norway".

¹³ Boitani, L., Kaczensky, P., Alvares, F., Andrén, H., Balys, V., Blanco, J. C., ... & Patkó, L. (2022, November). Assessment of the conservation status of the Wolf (*Canis lupus*) in Europe. In *Report to Bern Convention—Convention on the Conservation of European Wildlife and Natural Habitats*.

¹⁴ <https://stortinget.no/no/Saker-og-publikasjoner/Sporsmal/Skriftlige-sporsmal-og-svar/Skriftlig-sporsmal/?qid=108856>

¹⁵ The calculations include both alive and dead wolves during the monitoring period. See <https://brage.nina.no/nina-xmlui/handle/11250/3197628>

¹⁶ <https://www.nrk.no/innlandet/mdg-mener-regjeringa-holder-ulven-pa-grensa-til-utryddelse-1.17442235>, 5 June 2025.

¹⁷ It is not known to the Complainants whether any of the wolves killed in damage control hunting were genetically important individuals.

¹⁸ Boitani, L., Kaczensky, P., Alvares, F., Andrén, H., Balys, V., Blanco, J. C., ... & Patkó, L. (2022, November).

Assessment of the conservation status of the Wolf (*Canis lupus*) in Europe. In *Report to Bern Convention—Convention on the Conservation of European Wildlife and Natural Habitats*.

¹⁹ <https://www.naturvardsverket.se/om-oss/regeringsuppdrag/pagaende-regeringsuppdrag/rapportera-angivet-referensvarde-for-varg/>

²⁰ <https://www.svt.se/nyheter/lokalt/varmland/vargar-sparlost-forsvunna-i-varmland-och-dalarna>, 4 May 2025.

²¹ Miller, P. S., & Dussex, N. (2024). Joint Statement on the Results and Implications of Analyses Informing the Designation of Favorable Reference Value for the Wolf (*Canis lupus*) Population in Sweden.

²² This is in line with the judgment of the CJEU in the Spanish wolf case, C-436/22.

²³ C-601/22, para. 57.

²⁴ The quota for the culling of 27 wolves outside the wolf zone was approved by the Ministry of Climate and the Environment on 28 November 2024.

²⁵ This decision on the license hunting of 4 wolves has been disputed by NOAH; the final decision by the Ministry is pending.

²⁶ <https://rovdata.no/Nyheter/ArtMID/17026/ArticleID/6730/54-59-ulver-pavist-i-Norge-hittil-i-vinter.aspx>

²⁷ <https://www.nrk.no/innlandet/ulvene-i-norges-eldste-ulverevir-er-forsvunnet-1.17268933>, 13 February 2025.

²⁸ This means that 3 wolf packs have their territory only in Norway, and 3 wolf packs straddle between the border of Norway and Sweden. According to established practice and national regulation, a wolf pack whose territory is partially located in Sweden, shall be counted with a factor of 0,5 in Norway.

²⁹ <https://www.nrk.no/innlandet/bernkonsvensjonen-opnar-sak-mot-norsk-ulvepolitikk-1.17158020>, 6 December 2024.

³⁰ <https://www.rovdyr.org/aktuelt/miljostatsraden-det-at-det-er-apnet-sak-mot-norge-far-ingen-direkte-konsekvenser-for-norsk-ulvepolitikk/>, 8 December 2024.

³¹ <https://www.regjeringen.no/no/aktuelt/ulvens-beskyttelsesniva-i-europa-er-vedtatt-ndret/id3077914/>, 5 December 2024.

³² <https://www.nrk.no/innlandet/ulvemotstandarar-jublar-etter-ndring-i-bernkonsvensjonen--inviterte-til-spontanfeiring-i-osterdalen-1.17153003>, 3 December 2024.

³³ <https://www.stortinget.no/no/Saker-og-publikasjoner/Sporsmal/Skriftlige-sporsmal-og-svar/Skriftlig-sporsmal/?qid=100001>

³⁴ In management terms (see supra n. 4), 6,5 litters were registered. Wolves who have died in the same period are not deducted from the population figures and shall be deducted in the next year's report.

³⁵ The Ministry has set aside this legal precondition by stating in the decision: "In the Ministry's view, it is of no significant importance for this assessment that the population is now only 0,5 above the population target and the target has not been "reached (...) by a relatively good margin", cf. HR-2023-936-A section 47. The Ministry refers to what is said in section 4.5.1 about the need for license hunting to keep the population as close to the population target as possible."

³⁶ In the expert assessment of 4 November 2024, the Norwegian Environment Agency stated that due to the culling of wolves in three wolf territories last year, the room for maneuver to authorize culling this year is consequently reduced compared to previous year.

³⁷ The state-sanctioned license hunting can have the effect of legitimizing illegal hunting of wolves, called "facilitated poaching" (see Santiago-Ávila, F. J., Chappell, R. J., & Treves, A. (2020). Liberalizing the killing of endangered wolves was associated with more disappearances of collared individuals in Wisconsin, USA. *Scientific reports*, 10(1), 1-14). In January 2024, the *National Authority for Investigation and Prosecution of Economic and Environmental Crime* detained six hunters as suspects in poaching of wolves; two of detainees have previously engaged in license hunting of wolves. However, this effect has not been considered by the Ministry.

³⁸ As pointed out by the Ministry, this year's decision was the sixth in a row of decisions authorizing culling of wolves in established wolf territories based on "public interests of significant importance", and the fifth authorizing culling of wolves in the wolf zone on the same basis.