



Strasbourg, 4 August 2025



T-PVS/Files(2025)2023-3_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

45th meeting

Strasbourg, 8-12 December 2025

Bureau of the Standing Committee

16-18 September 2025 Strasbourg

Open file: 2023/03

**New wolf culling policy
(Switzerland)**

- COMPLAINANT REPORT -

*Document prepared by
Verein CHWOLF, Avenir Loup Lynx Jura (ALLJ)*



Verein CHWOLF
Nüburg 1
CH-8840 Einsiedeln

Avenir Loup Lynx Jura
(ALLJ)



Verein CHWOLF • Nüburg 1 • CH-8840 Einsiedeln (SZ) • Schweiz

Bern convention
Council of Europe
Avenue de l'Europe
F-67075 Strasbourg Cedex

Einsiedeln, 31 July 2025 / cs

Complaint No. 2023/3: Open File: Switzerland: New wolf culling policy

Additional information July 2025

Dear Sir or Madam

In your letter dated May 19, 2025, you gave us the opportunity to send an update on our last report. We are pleased to send you our additional information on the further development of the situation regarding Switzerland's wolf culling policy.

Abstract

Despite the recent downgrading of the wolf's protection status, we can state that Switzerland's wolf management policy, based on massive preventive (proactive) lethal pack regulation, is not compatible with the objectives and requirements of the Bern Convention.

The report "Wolf Regulation 2023-2025" published by the FOEN is a review of the first two regulation periods with a description of the measures taken, the statistically collected figures, and some attempts at explanation. No evidence is provided for the repeatedly cited urgent need for this preventive wolf regulation, which appears to be driven primarily by political and agricultural interests. For example, there are no accompanying, scientifically sound studies on the effects of these wolf regulations that are independent of politics and authorities. The much-cited monitoring is not carried out in Switzerland as comprehensive scientific wolf monitoring, but as purely numerical monitoring for the rapid determination of shooting quotas.

Switzerland's wolf culling strategy also requires considerable financial investment and a time commitment that is no longer manageable for gamekeepers. As a result, hobby hunters are increasingly being granted special permits to hunt wolves on a large scale within designated culling areas.

Switzerland neither complies with nor strives for a "favorable conservation status" in the scientific and species protection sense.

The minimum number of packs defined in the ordinance and the division of Switzerland into compartments were determined by politicians and administrators without any independent scientific basis. Furthermore, the "favorable conservation status" is defined solely by the number of packs per compartment; other factors are not taken into account.

www.chwolf.org ♦ info@chwolf.org

1. Additional information on the second regulatory period from September 1, 2024, to January 31, 2025

During the 2nd regulation period, which lasted from September 1, 2024 to January 31, 2025, at least 92 wolves and 3 lynxes (as of January 31, 2025) were shot preventively. Most of them had never killed livestock.

On May 27, 2025, the FOEN published the [report “Wolf Regulation 2023–2025”](#) (Appendix 1). According to this report, 38 packs were counted before the 2024/2025 regulation period: 26 in Switzerland and 12 across borders. A total of 320 wolves were recorded. In 2024, the FOEN approved the shooting of around 125 wolves. This is more than 1/3 of the total population:

- 3 packs were allowed to be reactively regulated
- In 17 packs, ½ or 2/3 of the pups were allowed to be shot proactively as “basic regulation” (all inconspicuous packs)
- 9 packs were allowed to be proactively removed in their entirety (this also included the previously reactively regulated packs)

All requests were justified on the grounds of preventing further damage or potential damage to livestock!

Wrongful killings

According to the FOEN report, a total of 92 wolves were shot preventively during the second regulation period. Sixty-seven wolves belonged to the pack for which the shooting permit had been issued. However, five wolves came from a different pack and 20 wolves were of unknown origin. In addition, two parent animals and three lynxes were shot by mistake.

According to the FOEN report, there were only five mistaken shootings in the second regulation period. These were the two parent animals and the three lynxes. All other animals are said to be killed legally, even though they did not belong to the packs that had been approved for shooting. They were in the approved shooting perimeter and were simply in the wrong place at the wrong time.

Culling entire packs (proactive pack regulation)

According to the FOEN report, only packs that have developed undesirable behaviors that must not be passed on from generation to generation can be completely removed.

CHWOLF comment: Undesirable behavior was already present in the first and second control periods if wolves from a pack had killed one sheep/goat in a protected situation or killed or seriously injured one large livestock in the previous 12 months. Protected animals also include farm animals that are only protected on paper, which were killed on pastures declared as “unreasonably protectable.” In addition, herd protection measures are often implemented very poorly and inadequately, but are uncritically assessed by the responsible authorities and accepted as professionally implemented herd protection measures. This has led to packs being unjustifiably released for shooting, even though they had not circumvented any real or effective herd protection measures.

Proactive (preventive) pack regulation (so called basic regulation)

For all other packs that were completely inconspicuous, the cantons were allowed to apply for partial regulation of the packs as so-called “basic regulation.” This means that ½ or 2/3 of the pups could be shot.

According to the FOEN report, preventive pack regulation is primarily carried out by shooting wolf pups, on the one hand to limit growth and on the other to educate pack members by making the adult animals more shy. Regulation must not endanger the population and must be necessary to prevent damage from

occurring, provided that this cannot be achieved through reasonable herd protection measures. According to the FOEN, a pack cannot be proactively regulated without justification (e.g., potential danger to livestock).

Comment from CHWOLF: Every wolf poses a potential threat to livestock – this requirement from the FOEN therefore gives the cantons carte blanche to apply for so-called “basic regulation” for all packs. In the vast majority of cases, the cantons' applications are then approved by the FOEN without conditions.

Regarding the sense (or nonsense) of the FOEN's educational approach, we would just like to note here that no scientific evidence has yet been presented for the justification of this culling.

(On the other hand, there is no question that a massive decimation (down to zero) of a regional wolf population in purely numerical terms will result in a temporary reduction in damage.)

Livestock attacks are declining

After peaking in 2022 (1,798 attacks), the number of attacks fell sharply in 2023 (1,260 attacks) and again in 2024 (926 attacks – data only recorded up to October 2024).

According to the FOEN report, this development can be linked to regulation and, on the other hand, an additional protective effect of herd protection, which has been provided with more financial resources since 2022, is likely to be effective.

CHWOLF comment: Most attacks occur in summer, during the alpine season or on spring and autumn pastures. As the first culling period did not start until December 1, 2023, there can be no connection between the preventive culling and the decline in attacks. In this case, the decline in attacks can only be attributed to improved herd protection.

Livestock protection

According to the FOEN report, livestock protection will receive more financial support from 2025 onwards. In the regular federal budget for 2025, “wildlife and hunting” is now estimated at CHF 7 million for expenses incurred in herd protection (in 2023, the FOEN supported agriculture with a total of CHF 7 million and in 2024 with CHF 5 million).

CHWOLF comment: An analysis of the “Wildlife and Hunting” commitment credit reveals that the additional financial aid to the cantons is intended for the supervision and implementation of measures for dealing with wolves. These measures also include the new and very costly pack regulations. Thus, the additional financial assistance is primarily being used to shoot wolves rather than to implement sustainable and effective herd protection measures.

The new Hunting Ordinance (JSV), which has been in force since February 1, 2025, states in Art. 4d Financial assistance for dealing with wolves:

- 1 The amount of financial assistance provided to the cantons for the supervision and implementation of measures for dealing with wolves in accordance with Article 7a, paragraph 3 of the Hunting Act is based on the number of packs in the canton. (Art. 7a Regulation of ibex and wolves and financing of measures)
- 2 The federal government's annual contribution shall not exceed CHF 30,000 per pack; for packs whose territory extends across several cantons, the contribution shall be divided proportionally among the cantons.

In plain language, this means that the federal government spends up to CHF 30,000 per pack each year on preventive regulation. In reality, the federal government has cut the budget for actual herd protection by 40% in 2025, terminated the contract with the National Herd Protection Agency AGRIDEA, and shifted the entire responsibility for herd protection to the cantons. This hasty and uncoordinated approach by the federal government will weaken herd protection for years to come.

Conclusion:

The entire FOEN report is pure sugarcoating and, in some cases, a pretence of facts. Monitoring in Switzerland has no scientific basis whatsoever and serves solely to collect data for hunting permits. With the completely unspecific justification of “potential danger to livestock,” Swiss lawmakers allow the cantons to carry out massive preventive regulation of the wolf population without serious scientific monitoring and assessment of the effects. A significant number of misfires (e.g., up to 50% in the canton of VS in 2024/2025) are accepted without criticism. Put simply, in reality, anything that comes in front of the shotgun is shot without control or consequences, and with the nod of approval from the FOEN.

KORA is not professionally consulted by politicians or administrators, neither by the FOEN nor by the cantons. Only the population figures from the monitoring data are used.

This behavior and approach by the Swiss authorities is not in line with the idea of species protection or the provisions of the Bern Convention.

2. Cantons are already planning the third regulation period for 2025/2026

The canton of Graubünden is already planning to shoot two-thirds of all pups born this year, this time with the help of hunters.

The head of the large predators department at the Office for Hunting and Fishing in the canton of Graubünden has announced that they will certainly carry out basic regulation of all wolf packs again this year and will attempt to shoot two-thirds of all pups. To this end, hunters are to be given more powers (Appendix 2). Up to 5,000 hunters will be allowed to shoot pups during the high hunting season starting on September 1. The only requirement is that they attend a two-hour instruction evening.

In order to ensure that shooting permits are available on the first possible hunting day, September 1, the canton wants to submit the shooting applications to the FOEN as quickly as possible. Although the canton does not even know yet whether or how many pups have been born in the various packs, it is already clear that two-thirds of the pups are to be shot - **and this without any reference to damage!**

Comment from CHWOLF: Graubünden is pushing the JSV to the limit with its plan to shoot two-thirds of all pups. With up to 5,000 hunters allowed to shoot wolves during the high hunting season, wolves in the canton of Graubünden are effectively becoming a huntable species. This is a flagrant violation of Swiss hunting law, Art. 7 para. 1: “All animals referred to in Article 2 that do not belong to a huntable species are protected (protected species).”

This circumstance is also in no way compatible with the requirements of the Bern Convention!

3. Favorable conservation status

Even though the protection status of the wolf in the Bern Convention has been downgraded from Appendix II (strictly protected) to Appendix III (protected), Switzerland is still obliged to maintain a favorable conservation status. The IUCN has calculated that Switzerland needs a population of at least 17 packs in the Alpine region and three packs in the Jura.

The threshold value of at least 12 packs, arbitrarily set by the Federal Council without scientific justification, as stipulated in the new JSV, falls far short of the requirements of the Bern Convention for a favorable conservation status. Furthermore, the threshold values set by the Federal Council are generally interpreted by the cantons as population targets, and hunting policies are maximized accordingly!

A favorable conservation status is not defined solely by the number of packs per area, but also by genetic diversity, the health of the population, and species-appropriate living conditions.

If, every year, a so-called “basic regulation” is carried out across the board and arbitrarily on all packs, with the preventive shooting of ½ (if only 1 pack is present in the compartment) or 2/3 of all pups, which is possible under the new JSV, a favorable conservation status cannot be guaranteed. If hunters are increasingly involved in wolf regulation, as planned by the canton of Graubünden, massive wrongful killings are inevitable (see Appendix 3). In order to maintain a stable and healthy population, packs must not be shot and destabilized again every year for no reason.

Neither the cantons nor the federal government (FOEN) are conducting any substantiated scientific studies to monitor and assess whether Switzerland can guarantee a favorable conservation status in accordance with the Bern Convention with this disastrous culling policy. (No scientific studies on the effects of previous regulation periods are available.)

4. Appendices:

1. FOEN report “Wolf regulations 2023–2025” dated May 27, 2025 (German)
2. Article in the Bündner Zeitung dated July 1, 2025, “Hunters of the canton of Graubünden are now also allowed to shoot pups” (German)
3. Article in the Tages Anzeiger dated July 20, 2025, “Error rate of 50 percent – canton shoots the wrong wolves” (German)

Appendices

- [Bericht Wolfsregulierungen 2023-2025](#)
- Presseartikel: [2025-07-01 Buendner Zeitung Seite 2](#)
- Presseartikel : [Wolfs-Abschuss im Wallis Fehlerquote von 50 Prozent Tages-Anzeiger](#)