



Strasbourg, 11 March 2025

TPVS/Files(2025)2023-03_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

8-10 April 2025 Strasbourg

Complaint on stand-by: 2023/03

**New wolf culling policy
(Switzerland)**

- COMPLAINANTS' REPORTS -

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Einsiedeln, 13 February 2025 / cs

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

Supplementary information

Dear Sir or Madam

In your letter dated December 20, 2024, you gave us the opportunity to send you 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.

1. Information on the 2nd regulation period from 01.09.2024 - 31.01.2025

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.

Implementation in the canton of Graubünden

The FOEN authorized the canton of Graubünden to shoot 3 entire packs (Vorab, Lenzerhorn and Fuorn packs). In addition, 2/3 of all pups from a further 8 completely inconspicuous packs were allowed to be shot as so-called "basic regulation". In Graubünden alone, 47 wolves and 3 lynxes were shot (as of 31.01.2025). The lynxes were shot in error as they were mistaken for wolves. The shootings were mainly carried out at night using night vision/thermal imaging technology.

On January 8, 2025, the canton of Graubünden announced that the Office for Hunting and Fishing had stopped shooting young animals from packs that were not to be completely removed (basic regulation).

Quote from the announcement by the canton of Graubünden: "Wolf regulation by the wildlife authorities mainly takes place at night and with the help of thermal imaging technology. Due to the body size of the young animals and their increasing individual excursions, the animals can no longer be reliably shot in accordance with the requirements of the Federal Hunting Ordinance - i.e. in social situations and under the protection of the year-old and older animals in the pack. Only those wolf packs that have not shown any undesirable behavior according to the Hunting Ordinance are affected by the cessation of regulation. These are a total of 11 young wolves from the Stagias, Calderas, Älpelti, Jatzhorn and Calanda packs. Pup regulation has been completed for the Moesola, Muchetta and Rügiul wolf packs. Accordingly, the focus of wolf regulation by the game warden will be on the complete removal of the Vorab, Lenzerhorn and Fuorn wolf packs by the end of January."

We were unable to find out exactly why the canton stopped the shooting of the remaining 11 young animals, whether there were any false shootings or whether parent animals were shot by mistake. We have not received

any documents or information from the canton of Graubünden since 2022, despite the applicable publicity law and legal objections, and KORA does not provide any information about the culls either. In the “Monitoring Center” of KORA [\[MONITORING CENTER | KORA - Predator Ecology and Wildlife Management – KORA\]](#), where all genetic evidence should be published, there are no entries of the shot wolves in the entire 2024 to date. When asked, KORA merely states that they are only allowed to publish these data once the cantons have communicated it.

We therefore only have access to the sporadic information from the canton's official publication. It is not possible to verify the data or check its plausibility.

Shooting of the entire National Park pack

Despite strong opposition from the National Park Commission, various scientific bodies, NGOs and a petition with more than 37,000 signatures, the canton of Graubünden has persisted with the culling of the entire Fuorn pack. Although the pack is transboundary [\[Distribution | KORA - Raubtierökologie und Wildtiermanagement – KORA\]](#), Graubünden did not consult with neighbouring Italy, as it would have been obliged to do under **Art. 1, Art. 10 para. 1, Art. 11 para. 1 a of the Bern Convention**.

The Fuorn pack's **core territory**, where their puppy rearing in 2023 and 2024 took place, was **demonstrably in the Swiss National Park and the core zone of the UNESCO biosphere reserve**. This can be clearly proven by photo trapping and observations by park rangers and researchers. However, the pack's foraging area extended beyond the boundaries of the National Park into Val Müstair and lower Engadina, especially in the winter months when the prey move to lower altitudes due to the amount of snow.

The cantonal authorities took advantage of this situation to legally enforce the shooting permit from the federal government and eliminate the Fuorn pack in winter just outside the boundaries of the National Park.

Most of the area where the shooting took place is part of the maintenance and development zone of the UNESCO biosphere reserve.

This action by the authorities is not only questionable but also an abuse of the legal provisions governing the Swiss National Park and the obligations of the Bern Convention.

Rendering impossible the SNP research project “Wolf - Influence on food webs” (2016-2036)

With the shooting of the entire national park pack, the SNP research project “Wolf - Influence on food webs”, which is being carried out in the national park from 2016 to 2036 and financed by the federal government, is currently completely impossible and massively impaired in terms of data collection, which is a major setback for the national park's research team.

According to Art. 11 para. 1a of the Bern Convention, the contracting parties are obliged to promote research that serves the purposes of the Convention. [\[Research projects - Swiss National Park\]](#)

Implementation in the canton of Valais

The FOEN authorized the canton of Valais to shoot 5 complete packs (Nanz, Augstbord, Les Toules, Hérens-Mandelon and Nendaz-Isérables). A total of 34 wolves were shot preventively in the 2nd regulation period (as of 31.01.2025). As can be seen from the list “Causes of death of wolves in Valais - proactive regulation” [\[Causes de mortalités de loups en Valais - vs.ch\]](#), many adult wolves, most probably also parent animals, were shot before the young animals, which violates the Swiss Animal Protection Act Art. 4 para. 2 and the Swiss Hunting Act Art. 7 para. 5.

Implementation in the canton of Vaud

The FOEN has granted the canton of VD permission to shoot the entire Mont Tendre pack. A total of 5 wolves in the area of this pack were shot as a preventive measure, but only one of them was a cub. In addition, 2 wolves were shot, which were not found during the subsequent follow-up search and may have survived. The evaluation of the genetic samples has not yet been communicated and it is therefore not yet clear which wolves were killed in this region. (as of 31.01.2025)

Impossibility of the KORA research project “Wolves and Cattle”

The extinction of the entire Mont Tendre pack will also make it impossible to continue the “Wolves and Cattle” research project, which KORA is conducting on this pack. The project should last from 2022 to 2026.

This also contradicts Art. 11 para. 1a of the Bern Convention. [\[https://www.kora.ch/en/projects/wolf/wolves-and-cattle\]](https://www.kora.ch/en/projects/wolf/wolves-and-cattle)

Implementation in the canton of St. Gallen

The canton of St. Gallen preventively shot 3 young wolves in the 2nd regulation period. One animal from the newly identified Gamserrugg pack and two young wolves from the Schilt2 pack.

Implementation in the canton of Ticino

The canton of Ticino has received permission from the FOEN to shoot 2/3 of the pups from four packs, the Onsernone, Val Colla, Corvina and Lepontino packs. A total of 3 wolves were shot.

>>> Link [“Fact sheet - Second preventive regulation of wolf packs: state of play”](#) from FOEN 24.01.2025

>>> Link [“Reproductions, packs, shootings and shooting orders of wolves” communicated by the cantons, monitoring year 2024](#) (until 31.01.2025)

2. Revised Hunting Ordinance came into force on February 01, 2025

On December 13, the Federal Council brought the revised Hunting Ordinance into force on February 1, 2025. In addition to a few improvements for the wolf, which came about thanks to many submissions during the catch-up consultation, the federal government also announced that it was reducing the herd protection budget by 40% to save money and handing over full responsibility for herd protection to the cantons. The preventive shooting of entire packs and the so-called “basic regulation” with the shooting of 2/3 of all pups from completely inconspicuous packs will remain in place and will continue to be implemented every year from September 1 to January 31. [\[Le Conseil fédéral met en vigueur la loi sur la chasse révisée au 1er février 2025\]](#)

Herd protection is massively weakened

Instead of continuing and increasing support for the tried and tested herd protection measures, the federal government is cutting the budget for herd protection by 40% and continuing to rely on the massive lethal regulation of the wolf population with the shooting of entire packs and completely inconspicuous young animals “basic regulation”. At the same time, it transfers all livestock protection tasks, including the breeding and management of livestock guarding dogs, to the cantons.

The contract with AGRIDEA, which previously coordinated the national livestock protection program in Switzerland on behalf of the Federal Office for the Environment FOEN, expires at the end of March and will not be extended by the federal government. The current mandate included the management of the “Specialist Unit for Livestock Guarding Dogs” and the “Specialist Unit for Technical Livestock Protection”. Until now, AGRIDEA has supported the federal and cantonal authorities in general enforcement, in advising on livestock protection and in the development of technical principles for livestock protection. It also handled the financial support for the measures. Nobody currently knows what will happen next. The previous central program for the breeding and use of livestock guarding dogs has already been stopped by the federal government.

The federal government is thus de facto shirking its overall responsibility for regulating livestock protection throughout Switzerland!

The cantons are thus confronted with the new herd protection tasks and their implementation hastily and in some cases unprepared.

The result is a massive weakening of livestock protection, at least temporarily. This shows once again that the federal government is not interested in promoting a balanced coexistence between humans, wolves and livestock with as little conflict as possible. It is solely concerned with decimating the wolf population as quickly and extensively as possible for the benefit of the agricultural industry. This has nothing to do with scientifically sound and nature-friendly wolf management. The years of development work for successful livestock protection are thus being torpedoed by official bodies and massively weakened in the long term.

Regulation of herd protection funding in the new Hunting Protection Ordinance (JSV):

JSV Art. 10f FOEN subsidies for the prevention of damage caused by large carnivores

Para. 1 The FOEN shall assume a maximum of 50% of the costs of the planning measures listed in letters a to c as well as reasonable measures for the protection of herds and bees in accordance with letter d.

Previously, the Confederation supported herd protection measures with a maximum of 80%. This reduction therefore corresponds to a cut in federal subsidies of around 40 per cent.

Slight improvements in the new Hunting Protection Ordinance (JSV)

The new Hunting Protection Ordinance contains slight improvements to the draft in two articles.

JSV Art. 3ter Ban on night hunting

Para. 1 **Hunting in the forest at night is prohibited**, with the exception of stand hunting for huntable predators in winter. This includes in particular the hunting of foxes, badgers, martens and non-native species such as raccoons. *(Until now, most wolves have been shot at night using thermal imaging technology)*

JSV Art. 4b Regulation of wolves in accordance with Article 7a of the Hunting Ordinance

Para. 1 ... Animal welfare concerns, in particular the **protection of young animals**, must be taken into account during regulation.

(In the past 1st and 2nd regulation period, adult wolves were repeatedly shot before the young animals, which violates the Animal Protection Act)

Preventive shooting of entire packs in the event of undesirable behaviour:

Para 4 Undesirable behaviour exists in particular if the wolves of a pack individually or together:

- a. **Repeatedly** overcomes professionally implemented herd protection measures and subsequently kills livestock.
- b. **Repeatedly** attack animals of the cattle or horse species and kill or seriously injure them in the process.

(This provision on repeated attacks does not apply to packs that were already allowed to be completely eliminated in the previous year's regulation period.

According to the explanatory report: If the canton was granted approval for the removal of the pack by the FOEN in last year's regulation period, this already confirmed undesirable behaviour, so that the pack can be removed in the current regulation period if another kill occurs in a protected situation. The pack continues to exhibit undesirable behaviour under these circumstances).

3. Summary of violations of the Bern Convention Art. 1, 2, 7, 8, 9, 10 and 11

Even though the protection status of the wolf in the Bern Convention will be downgraded at the beginning of March and there are slight improvements in the new Swiss Hunting Ordinance, Switzerland continues to violate the Bern Convention several times with its shooting policy.

Violation of Art. 2, Art. 7 para. 1 and 2

Even with the new Hunting Ordinance, which came into force on February 1, 2025, a threshold of 12 packs still applies. This minimum population threshold is far below the threshold recommended for the Alpine region for a favourable conservation status.

Violation of Art. 1, Art. 10 para. 1, Art. 11 para. 1a

The Fuorn pack is described by KORA as a transboundary pack. Part of the territory is located in Italy.

[\[Distribution | KORA - Predator ecology and wildlife management – KORA\]](#)

However, the canton of Graubünden has not agreed and coordinated the shooting of the entire pack with Italy, which would be an obligation for all contracting parties according to the above-mentioned articles of the Bern Convention.

Violation of Art. 11 para. 1b

According to Art. 11 para. 1b, the contracting parties are obliged to promote research that serves the purposes of the Convention. With the removal of the entire Fuorn pack and the entire Mont Tendre pack, the research work in the National Park as well as the research work “Wolves and Cattle” of KORA are made impossible.

Violation of Art. 6 and Art. 9

According to Article 6, any intentional killing of these animals is prohibited. However, Article 9 allows exceptions in certain situations: **“Provided that there is no other satisfactory solution** and the exception does not harm the population concerned, each Contracting Party may grant exemptions from Articles 4, 5, 6, 7 and from the prohibition on the use of the means referred to in Article 8.” This includes the **prevention of serious damage** to crops, livestock, forests, fishing grounds, waters and other property.

Situation without damage:

With the so-called **“basic regulation”**, however, 2/3 of all pups **from completely inconspicuous packs** can be shot on the grounds of “potential possible damage”.

However, such potential or future damage in packs that have not yet caused any damage, can be prevented first and foremost with reasonable herd protection measures. In these situations, herd protection is therefore a primary solution and certainly a satisfactory one in the vast majority of cases. The “basic regulation” applied on a large scale in Switzerland therefore violates the Bern Convention in every respect.

Situation with damage:

To release a single wolf for shooting, **one damage to large livestock** is still sufficient. In the case of packs already regulated in the previous year, the rule continues to apply that only **one further damage to sheep/goats or large livestock in protected herds** is sufficient for the entire pack to be released for shooting. The elimination of entire packs or individual wolves on the basis of a single loss per year is completely disproportionate and contravenes the provisions of the Bern Convention, which only allows exceptions for the prevention of serious damage.

It should be noted that in almost all cases, livestock farmers are compensated by the federal government and the cantons for losses caused by wolves, **meaning that in principle no relevant economic damage is caused to livestock farmers.**

4. Already further relaxation of wolf protection called for in parliament

With the motion “Targeted regulation of wolves with less bureaucracy”, a further relaxation of wolf protection will be discussed in Parliament in February. The motion calls for regional hunting of wolves or the introduction of wolf-free zones.

[\[24.4257 | Régulation ciblée des populations de loups avec moins de bureaucratie | Business | The Swiss Parliament\]](#)

5. Additional Information

CHWOLF lodges an appeal with the Federal Supreme Court

The Federal Administrative Court has not accepted our appeal, which we submitted in January 2024. We have now appealed the Federal Administrative Court's negative decision to the Federal Supreme Court on 20 January 2025.

«More and more sheep are dying in Switzerland - what role does the wolf play?»

Article published on 09.01.2025 in the Tages Anzeiger (attached as supplement)

56,000 sheep died in 2024 (excluding slaughtered animals). A large proportion of the animals died from diseases (parasites, epidemics, etc.), accidents or poor husbandry conditions. Around 1000 sheep were killed by wolves in 2024. This is just under 2% of all losses. A negligible small number when compared to all other losses, and yet the wolf seems to be the biggest problem for agriculture, politics and administrations.

6. Supplements:

1. [fact sheet - Second preventive regulation of wolf packs: state of play as of January 25, 2025](#)
2. [Hunting Ordinance in force since 01.02.2025](#) (French)
3. [Explanatory report on the new hunting ordinance](#) (French)
4. [Report on the results of the consultation](#) (French)
5. [Article Tages Anzeiger on 09.01.2025 «In der Schweiz sterben immer mehr Schafe – welche Rolle spielt der Wolf?»](#)