



Strasbourg, 2 December 2025

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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

45th meeting
Strasbourg, 8 – 12 December 2025

**Change in the protected status of the wolf from ‘strictly
protected’ to ‘protected’**

- Complaint Form -

Document prepared by Freundeskreis freilebender Wölfe e.V.

**Convention on the Conservation of
European Wildlife
and Natural Habitats**



COMPLAINT FORM INSTRUCTIONS:

NB: Submitting a complaint to the Bern Convention is a serious accusation against the concerned Contracting Party(ies). Complaints must demonstrate a sufficient degree of seriousness or urgency related to species or habitats of European importance, and the complainant must demonstrate that the issue has already been raised at local and/or national level.

Complaint forms must be submitted in electronic word format, in English or French, and not exceed 3 pages, including the first administrative page. A maximum 5-page report can be attached. The Secretariat will request additional information on a case-by-case basis. Anonymous complaints are not admissible; however the Secretariat will take measures to keep the personal details of the complainant confidential.

Please, fill in this form and send it to the attention of:

Bern Convention Secretariat

Directorate of Democratic Participation

Council of Europe

F-67075 Strasbourg Cedex

E-mail: Bern.convention@coe.int

On behalf of (if applicable): Freundeskreis freilebender Wölfe e.V. (nationwide state-recognized nature conservation association)

Website: <https://www.freundeskreiswoelfe.de>

Date: 23.10.2024

1. Please state the reason of your complaint (refer also to the Contracting Party/ies involved and the Articles of the Convention which might be violated)

Decision of the Council of the European Union of 26/09/2024;

Change in the protected status of the wolf from 'strictly protected' to 'protected'

This decision is based on a proposal from the European Commission.

The aim of the BC is to conserve wild flora and fauna and their natural habitats, see Article 1 BC.

According to Article 2 of the BC, the Parties must take the necessary measures to maintain or restore populations of wild flora and fauna at a favourable conservation status, taking particular account of **ecological, scientific and cultural requirements**. Consequently, in our opinion, this proposal violates the BC in several respects because

1. it is **not based on reliable scientific facts and requirements, draws false conclusions and does not take account of ecological and cultural requirements and social circumstances**, cf. articles 1, 2 and 9 of the BC,
2. it violates the **precautionary principle** inherent in the BC and the **principle of proportionality**,
3. in our opinion, this proposal by the Council (amendment) is **not formally admissible** because it was **not adopted in the EU Council of Environment Ministers, which is actually responsible for this**, but

rather, in order to meet the application deadline in accordance with Articles 16 and 17 of the BC, on 25. September 2024 in the Competitiveness Council, see Annex 1,

4. this proposal is exclusively politically and personally motivated ('Dolly moment') and the party-political events and the situation in Germany following the three state elections (Saxony, Thuringia and Brandenburg) contributed significantly to the realisation of this decision.

For a description of the situation in Germany, please refer to Annex 2. For the reasons for 1. to 4., please refer to Annex 3.

Appeal to the members of the Standing Committee of the Bern Convention!

Take a stand and prove that your trust in the integrity of this Committee is justified. Reject this renewed populist and politically motivated general attack on European nature and species conservation and our natural resources. Do not allow yourself to be instrumentalised as a stooge for the implementation of a personal act of revenge by an emotionally compromised EU Commission President and the implementation of demands by lobbyists who only want to ruthlessly exploit and harm nature. The BC was created to protect nature and its components from being destroyed by such populist and political arbitrary acts.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention that are potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

European grey wolf (*Canis lupus*) of the Central European plains wolf, which is also native to Germany

3. What might be the negative effects for the specie/s or habitat/s concerned?

According to Article 4 of the BC the protection of habitats is only provided for Appendix I and II species. If the wolf is listed in Appendix III of the Bern Convention, **its habitats (core zones, rendezvous sites) would no longer be protected. It would automatically become a huntable species** and could legitimately be hunted in the same way as roe deer. This does not even require an amendment to the Federal Nature Conservation Act (BNatSchG), cf. §§ 7 (2) no. 14, 44, 45 (7) and 39 BNatSchG, automatic legal consequence. The federal states can then decide on the fate of the wolf within the framework of their state hunting laws. **Associations and nature conservation organisations will no longer be able to subject the killing of wolves to judicial review**, as exemptions and individual case reviews within the meaning of Article 16 of the Habitats Directive/§ 45 (7) BNatSchG would no longer be necessary. **The killings would also no longer have to be publicized. This would be a violation of the Aarhus Convention.** A population management system (collective killings) would be introduced, in the context of which **completely inconspicuous wolves could also be killed (preventive killings, such as those currently taking place in Switzerland, for example).**

As livestock protection measures have still not been introduced across the board and those who refuse to protect livestock would rather 'protect livestock with a shotgun', this will lead to **wolves being permanently shot in many regions**, even if they have not killed grazing animals. This regionally differentiated population management, which has long been demanded by the farming and hunting lobby (including the German Farmers' Association, the Action Alliance Forum Nature, the German Hunting Association), **will ultimately lead to wolf-free zones and, in the long term, to the re-eradication of wolves in Germany.** A hunter from Brandenburg (Mr Hamann, managing director of the association) said that he proposed 'hunting seasons for wolves (November to December) in order to be able to **kill wolves during autumn driven hunts**'. **And he called for an upper limit for wolves.** Such statements show a lack of knowledge among hunters about the wolf's biology and way of life. In autumn, wolf pups are about 7 months old and still completely dependent on their parents. If parent animals are shot during driven hunts and the pack structures are destroyed, helpless, weakened wolves are left behind, which then prey on unprotected grazing animals all the more.

The fact that a favourable conservation status must be maintained will be ignored by hunters or artificially defined, see the Swedish approach. Hunting authorities are then allowed to decide for themselves in accordance with hunting legislation. Red-listed species are hunted in Germany! Hunters are not interested in whether species are threatened with extinction. There is no legal possibility of preventing the hunting of red-listed species (which includes the wolf in Germany). There are no effective control and supervisory bodies in Germany that can control and, if necessary, restrict hunting.

Furthermore, it is to be feared that the transfer of responsibility for wolves from the nature conservation authorities to the hunting authorities will result from their inclusion in hunting legislation. However, hunters lack any scientific expertise in dealing with wolves and in carrying out wolf management and wolf monitoring. The Hunting Association of Lower Saxony is a negative example. In its summaries and evaluations, it always refers to the scientific work of wolf biologists, such as Mrs Ilka Reinhardt. All the competencies and official structures that have been built up to date would be subject to extensive or even almost unmanageable reorganisation measures, including the dissolution of specialist nature conservation authorities. This would paralyse nature and species conservation in Germany for years to come and is probably the EU Commission's intention. Volunteer conservationists will stay away from wolf monitoring and will no longer volunteer to help build herd protection fences if hunters are allowed to shoot wolves as part of 'population management' in their usual overlord manner and pasture farmers are allowed to practise 'herd protection with a shotgun'.

Placing the fate of the wolf in the hands of the hunting community means its re-extinction in Europe, because the decision-makers in the hunting community see the wolf as a disruptive competitor that calls their raison d'être into question. It is also to be **feared that there will be trophy hunts for wolves in Germany as in Sweden, that an artificially defined conservation status will be declared** and that all wolves beyond this will be allowed to be shot. **A massacre is pre-programmed.**

In 2025, Germany must once again submit a report on the favourable conservation status of the Annex IV species of the Habitats Directive. Based on the report, the EU Commission will determine whether the conservation status in Germany is considered favourable or unfavourable. A glance at the distribution map (Annex 4) reveals that 2/3 of the national territory has only very small wolf populations.

In fact, a favourable conservation status has been achieved in the Atlantic biogeographical region, but by no means in the neighbouring continental and subsequently in the Alpine region. Therefore, from a biological, wild ecological and thus scientific point of view, a favourable conservation status cannot be declared for Germany. In addition, a population that has achieved a favourable conservation status must be kept stable from a scientific perspective, as this population is responsible for ensuring that wolves can spread from these base populations to other regions, with the declared aim of achieving a favourable conservation status in accordance with the Habitats Directive. From a scientific point of view, a population base in a region from which individuals can constantly migrate is required for an area-wide spread.

In Germany, this is the Atlantic biogeographical region in the north. If the protection status of the wolf, a strictly protected species for good reason, is downgraded considerably too early and subsequent management (wolf culls) is carried out, neither the continental nor the Alpine biogeographical region will ever be able to achieve a favourable conservation status.

Downgrading the protection status of the wolf with the consequence of future population management in accordance with an emerging exclusively **politically driven regulation through hunting** would prevent the achievement of a favourable conservation status in Germany and Europe-wide. **In addition, the framework conditions for a latent renewed extinction of the wolf would thus be legally established.**

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald Network, UNESCO site? Are there pending procedures within another international institution?

is not known

5. Have you attempted to address this issue with the relevant local and national authorities? Please describe. Are there any pending procedures at national level regarding the object of your complaint?

There have been several replies from the EU Commission to complaints about Germany's handling of the wolf and about the EU Commission's proposal to downgrade the protected status of the wolf. However, the responses are superficial, evasive and incomplete, disregarding the provisions of the Habitats Directive and the case law of the European Court of Justice. It is obvious that the EU Commission no longer wants to protect the wolf after the Dolly moment.

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc) (for large files, please add a separate annex document, as mentioned in the above instructions)

see Annex 4 and 7

Annex 1:



Council of the
European Union

Brussels, 25 September 2024
(OR. en)

13577/24
PTS A 71

LIST OF 'A' ITEMS

COUNCIL OF THE EUROPEAN UNION
(Competitiveness (Internal Market, Industry, Research and Space))

Europa building, Brussels

26 September 2024

Non-legislative activities

Internal Market and Industry

1. Council Decision authorising the opening of negotiations on the Design Law Treaty
Adoption
approved by Coreper, Part 1, on 25.9.2024
13466/1/24 REV 1
13205/24 + ADD 1
PI
2. Commission's intention to enter into an OECD Ministerial Declaration on protecting and empowering consumers in the digital and green transitions
Authorisation to sign an NBI
approved by Coreper, Part 1, on 25.9.2024
13422/24
CONSOM

Institutional Affairs

Appointments

3. Deputy Executive Director and the President of the Boards of Appeal of the European Union Intellectual Property Office (EUIPO)
Adoption
approved by Coreper, Part 1, on 25.9.2024
13385/24
12957/24
PI

Energy

- 4. EEAS intention to negotiate, in cooperation with the Commission, a Call to Action for No New Coal in national climate plans
Authorisation to negotiate an NBI
approved by Coreper, Part 1, on 25.9.2024

13413/24
ENER
- 5. Commission's intention to endorse on behalf of the EU Global Pledge on Green Energy Storage at the 29th Conference of the Parties to the UN Framework Convention of Climate Change (COP29)
Authorisation to negotiate an NBI
approved by Coreper, Part 1, on 25.9.2024

13472/24
ENER
- 6. "Joint Ministerial Statement" of the 15th Clean Energy Ministerial Meeting and 9th Mission Innovation
Approval of an NBI
approved by Coreper, Part 1, on 25.9.2024

13151/24
ENER

Employment and Social Policy

- 7. Pledge on sustainable lifestyles, fairness and access to clean energy technologies - Clean Energy Ministerial
Authorisation to negotiate an NBI
approved by Coreper, Part 1, on 25.9.2024

13481/24
SOC

Environment

- 8. Climate Club's Joint statement in the margins of COP29
Authorisation to negotiate an NBI
approved by Coreper, Part 1, on 18.9.2024

13248/24
CLIMA
- 9. CBD COP 16 (Cali, Colombia, 21 October–1 November 2024): "World Coalition for Peace with Nature: A Call for Life" and Joint Declaration of the "World Coalition for Peace with Nature"
Authorisation to negotiate an NBI
approved by Coreper, Part 1, on 25.9.2024

13649/24
ENV
- 10. Council Decision on submitting proposals for amendment of Appendices II and III of the Convention on the Conservation of European wildlife and natural habitats
Adoption
approved by Coreper, Part 1, on 25.9.2024

13769/24
+ ADD 1-2
13258/24
ENV

Foreign Affairs

11. Force Catalogue 2024
Information note
approved by Coreper, Part 2, on 25.9.2024
- 13132/24
CSDP/PSDC

EU positions for international negotiations

12. Council Decision on the EU position to be taken in the Joint Committee as regards the adoption of a decision adding a newly adopted Union act to Annex 2 to the Windsor Framework
Adoption
approved by Coreper, Part 2, on 25.9.2024
- 12588/24
13215/24 + ADD 1
UK
13. Council Decision on the EU position in reply to ICAO on the review of limits of liability under the Montreal Convention
Adoption
approved by Coreper, Part 1, on 25.9.2024
- 13394/24
13322/24
AVIATION

Other items

14. Interim use of cryptographic products
Approval
approved by Coreper, Part 2, on 25.9.2024
- 13152/24 R-UE
13153/24 R-UE
CSCI
15. Cryptographic product for the protection of EUCI
Approval
approved by Coreper, Part 2, on 25.9.2024
- 13158/24
CSCI

-
- Item based on a Commission proposal
- R-UE Document classified RESTREINT UE/EU RESTRICTED
-

Annex 2: The situation in Germany and the EU

The **political situation in Germany** and the **personal involvement of Mrs Ursula von der Leyen** are largely responsible for the decision.

After the massive pressure of the farming lobby, the regulation for the restoration of nature has been watered down to the point of ineffectiveness. Now, once again, the strict and effective Habitats Directive is to be changed and massively weakened under pressure from the farming lobby, using the 'wolf as a gateway'. The EU Commission is working on an amendment to the Habitats Directive. Due to the poor election results of the governing parties (SPD, Greens, FDP) in the last state elections in the federal states of Saxony, Thuringia and Brandenburg, Chancellor Olaf Scholz (SPD) gave in to pressure from the farming lobby and instructed Federal Environment Minister Steffi Lemke to vote in favour of the EU

Commission's proposal. <https://www.schweizerbauer.ch/politik-wirtschaft/international/wolf-bundeskanzler-stellt-sich-hinter-landwirte>

The federal government had only responded in April 2024 as part of its response to a minor question from AfD members of parliament (printed matter 20/10906): ***'The federal government is not aware of any scientific basis for reducing the costs of grazing animal protection by reducing the wolf population.'*** According to the annual reports of the Federal Government's Documentation and Advisory Centre on Wolves (see answer to question 1), in 2022 there was no or only limited minimum protection in just under half to three quarters of the attacks on sheep and goats. ...

In principle, to avoid attacks on sheep and goats, it is important that preventive measures are established as early as possible throughout the wolf's range. Unprotected grazing animals would in principle be killed even if the wolf population were reduced. Therefore, livestock protection plays a key role in dealing with the wolf."

Thus, against better knowledge, the downgrading of the protection status and thus the ordinary hunting of wolves was agreed to.

It was only with Germany's consent that the Council reached the required qualified majority for the decision. In a protocol note, the EU Commission has assured Germany (see also the BMUV press release <https://www.bmuv.de/meldung/bundesumweltministerin-lemke-zu-schutzstatus-wolf-in-berner-konvention>) that it would only adapt the provisions on the wolf contained in the Habitats Directive and that the changes would be limited to the wolf's protection status. However, it is illusory to believe that this assurance can be kept. This is because the amendments to the Habitats Directive will have to be negotiated with the EU member states, and it is certain that further demands from the EU member states, as well as from the farming and hunting lobby, will be made in relation to unwelcome animal (lynx, bear, otter, white-tailed eagle, beaver) and inconvenient nature conservation requirements (e.g. fertiliser use, insect protection, wolf hunting according to the Swedish model).

Furthermore, this is **blackmail on the part of the EU Commission**: Sacrifice the wolf or the Habitats Directive will be weakened to the point of ineffectiveness in the amendment procedure! With the current 'shift to the right' in Europe, where nature and species protection are at the bottom of the political agenda, the worst **is to be feared for European nature and species protection**. Sweden serves as a sad example of how large carnivores, strictly protected species, are treated. Trophy hunts for wolves, lynx and bears take place there, and the EU Commission has been doing nothing but watching for more than 10 years and letting the infringement proceedings slide.

The state of the isolated Swedish wolf population is worrying. As a result of Swedish 'stock management' (ruthless hunting), the wolves in Sweden will sooner or later die out again. They

They have been hunted down to a population that is no longer able to survive. Inbreeding and deformities are the result, because the wolves are prevented from colonising other habitats and no (genetic) exchange with other subpopulations can take place. **Recently, the Swedish government announced that it would set the reference value for a favourable conservation status of the wolf at 170 individuals. You don't have to be a scientist to realise that this will lead to the extinction of the wolf in Sweden.**

The fact that the EU Commission has tolerated and preferred this Swedish model for many years, and that the new EU Commissioner for the Environment is to be Jessica Roswall (https://commission.europa.eu/about-european-commission/towards-new-commission-2024-2029/commissioners-designate-2024-2029_en?prefLang=de&etrans=de) is planned, it gives an indication of the terrible fate that awaits the other European wolf populations if the protection status is lowered.

Even if the EU Commission and EU Member States keep their promises to only agree to the changes related to the wolf, the downgrading of the wolf's protection status is still scientifically unjustified, prevents the achievement of a favourable conservation status and is a sign of **speciesism**.

Here, the massive pressure of the farmers' and hunters' lobby has been given in, especially to those who absolutely do not want to practice any form of herd protection (**total objectors**). For illustration, two excerpts from the damage statistics of the federal states of Saxony and Lower Saxony are attached https://www.umweltkarten-niedersachsen.de/Umweltkarten/?topic=Natur&lang=de&bgLayer=TopographieGrau&E=442344.56&N=5859877.77&zoom=2&layers=alleNutztierschaeden_2024.

The excerpt from **Lower Saxony** provides a particularly striking example. In 2024, minimum protection was **only provided in 13 out of 268 cases**. Minimum protection merely means that livestock owners are compensated after livestock are killed by wolves, but not that the fence was wolf-proof.

To reduce the protection status in order to be able to hunt the wolf is a step back in the wrong direction and an indictment of Germany, because in all the years since the wolf's return, it has not managed to implement measures to protect grazing animals that would enable coexistence. Not even the President of the European Commission, Mrs Ursula von der Leyen, is willing to implement livestock protection measures to protect her animals.

With their decision, the EU member states have also endorsed a personal act of revenge by the President of the EU Commission, Mrs Ursula von der Leyen. In September 2022, the wolf GW950m killed Mrs von der Leyen's favourite pony, which was completely unprotected. (Meadow near Beinhorn in Lower Saxony, see photo for the condition of the meadow)

The pasture is located in a pack territory that has been known about for a long time. Nevertheless, the pasture was not protected with adequate livestock protection fencing. The killing was therefore provoked in order to obtain a permit to shoot the wolf.

After this event and in the context of the subsequent European election campaign, Mrs von der Leyen launched her attack on the wolf and called for a 'data collection'. Quote Mrs von der Leyen:

'The concentration of wolf packs in some European regions has become a real danger for livestock and potentially also for humans. I urge local and national authorities to take action wherever it is needed. The EU rules in force today explicitly provide for such powers.'

In the context of the EU Commission's 'data collection'

https://ec.europa.eu/commission/presscorner/detail/de/IP_23_4330

It should be noted that her own pasture was and still is not secured with adequate livestock protection fencing.

Now that she has the politically right majorities on her side, and with them the hunting and farming lobby, who have always been the loudest in calling for the culling of wolves, she is using her official powers as President of the EU Commission and is pushing ahead with the procedure to change the protection status of the wolf with all her might. This is an **abuse of office**. She wants to keep her election promise.

She has therefore arranged for the vote on the Commission's proposal to be taken not in the Council of Environment Ministers, which is technically responsible for this, but in the Competitiveness Council on 25 September 2024. The Council of Environment Ministers, which is technically responsible for the vote, met on 14 October 2024. According to Article 17 of the Bern Convention, proposals for amending the appendices must be submitted no later than two months before the meeting of the Bern Convention

Standing Committee (from 2 December 2024 to 6 December 2024). This means that the decision of the EU Council of Environment Ministers would have been too late and it would no longer have been possible to submit an application for an amendment by the deadline.



Das ist die Weide auf der das Pony „Dolly“ von Frau Ursula von der Leyen stand. Das Pony war völlig ungeschützt.

This is the pasture where Mrs Ursula von der Leyen's pony 'Dolly' was standing. The pony was completely unprotected.

Das ist ein Rhodesian Ridgeback, aufrechtstehend unter dem Draht, auf dem kein Strom ist.

This is a Rhodesian Ridgeback, standing upright under the wire where there is no electricity.



Annex 3: Reasons**Reasons for 1., 2., 3. and 4.**

Regarding 1: With reference to **scientific studies**, cf. <https://rm.coe.int/inf45e-2022-wolf-assessment-bern-convention-2791-5979-4182-1-2/1680a7fa47>, **the objectives for restoring a favourable conservation status have not been achieved and the wolves' habitats have not been protected** (known pack territories, core zones and rendezvous sites are not protected from disturbance and destruction). Even 26 years after the return of the wolf to Germany, no protected areas have been established for the wolf. **Driven hunts and extensive forestry work take place in known territories**, through core zones and rendezvous sites (even in Habitats Directive/Natura 2000 areas). The greatest threats to wolves such as **illegal killings**, disturbance of resting and breeding sites and dangers from traffic and habitat destruction have not been and are not being effectively combated. **A special task force to investigate illegal killings of wolves or cases of wildlife crime has not been set up.**

The greatest threat to wolves comes from humans. Illegal killings, poisoning, laying out bait with wires and sharp objects. Some hunters and farmers openly admit to taking matters into their own hands (vigilante justice). 'We'll sort it out ourselves here.' (hunter from Lower Saxony), 'We shoot regularly. That's not a bad thing. Nobody digs for it anyway.' (hunter from Lusatia). They blackmail authorities and politicians by saying that they will not stop killing wolves illegally until they are legally allowed to do so. To make matters worse, they have nothing to fear. This is because these offences are not investigated properly or with the necessary ambition by the authorities. There is simply no competent authority. To date, not a single case of wildlife crime has been solved and not one offender has been convicted. There is also no recognisable will on the part of the federal or state governments to tackle wildlife crime in a targeted manner. Not even in such a shocking case as the dumping of a wolf's head in front of a NABU species protection centre in Leiferde (Lower Saxony) and the discovery of dismembered wolf carcasses. Here too, Germany is not fulfilling its duty to protect a strictly protected species. Not only the wolf is affected by this. The lynx population is also unable to establish itself due to massive illegal persecution. According to the DBBW, around 100 cases of wolves being killed illegally have been recorded. <https://www.dbb-wolf.de/totfunde/auflistung-nach-jahren> The number of unreported cases is many times higher and certainly exceeds the number of wolves killed in road accidents. See also the IZW report <https://www.izw-berlin.de/de/pressemitteilung/leibniz-izw-obduziert-1000-wolf-seit-beginn-des-totfund-monitorings-im-jahr-2006.html>

Wolves are hunted illegally on a massive scale. This is the main reason why they are only spreading into Germany at a very slow pace and exclusively from the east and not from northern or southern Europe. Another very serious threat to wolves comes from **the anti-pig fences** that have been installed. These stretch over 800 kilometres through Germany and cut off the wolves' path. There are wolves that have learnt to get over these non-electrified fences. This is a very fatal development, as it leads to more protected grazing animals being killed. However, this is not the wolves' fault, but they are being blamed for it.

In Germany, measures that contribute to peaceful coexistence were not sufficiently promoted and implemented across the board. In more than 80 % of the incidents, the grazing animals were not or only inadequately protected and EU funding for herd protection measures was not fully utilised. The federal state of Lower Saxony (Germany) provides a particularly shocking example of a refusal to protect livestock. In only 13 out of 268 incidents, minimum protection was provided (as of October 2024), 881 animals were killed, injured or lost. In addition, Lower Saxony does not even consider basic protection for cattle and horses to be necessary and insists that herd protection on dykes is not possible, see Annex 5 Lower Saxony risk table. Saxony-Anhalt shows that herd protection works. So far in 2024, there have only been 28 incidents with 96 grazing animals killed. According to the LAU, there were only 15 cases in Saxony-Anhalt where there was no minimum protection: <https://lau.sachsen-anhalt.de/naturschutz/das-wolfskompetenzzentrum-wzi/nutztierrisse/risstatistik-st/nutztierriszahlen-2024> Because Saxony-Anhalt acts scientifically and objectively and effective measures to promote and implement herd protection measures were implemented at an early stage, the number of attacks on grazing animals has been falling for years despite a slight increase in the number of wolves.

In Germany, **there is a lack of data collection on the functionality and effectiveness of livestock protection measures** that would prove that professionally applied livestock protection measures are

effective. **The damage statistics and overviews of livestock kills in the federal states do not contain any information on whether wolf-repellent livestock protection measures were in place**, but only information on minimum protection. However, the standard minimum protection does not fulfil the criteria for a wolf-repellent livestock protection fence.

The persistent smear campaign against the wolf by the hunting and farming lobby, which was even allowed to be generously disseminated by the public media, was not countered by the state.

That herd protection does not work is simply a lie launched by an ongoing smear and disinformation campaign against the wolf by the farming and hunting lobby.

This proposal undermines national and international efforts to ever achieve a favourable conservation status of the wolf population in Germany and also hinders the further implementation of necessary protection measures for wolves and herd protection measures for grazing animals. Pasture farming in Germany was already in decline before the return of **the wolf**. The wolf is not responsible for this and **does not threaten the existence of grazing livestock farming**. Over 70 % of grazing animals in Germany are kept by hobby farmers and farmers as a sideline, mostly without any economic purpose.

In Germany alone, 730 million animals are killed for food production every year, millions of farm animals die unused due to the conditions in factory farming. A total of 893,124 farm animals died during transport in Germany in 2021, 123,604 were not authorised for slaughter but were killed anyway. **Thousands of farm animals are currently dying from bluetongue**. The number of grazing animals killed by wolves is in the per mille range compared to the number of slaughtered animals, fallen stock and unutilised livestock.

In terms of economic 'damage' such as compensation payments for grazing livestock farmers or costs for herd protection measures, the financial resources spent on this are very, very small in comparison to the **tens of millions in German development aid, e.g. for nature and species conservation measures in Africa. German development aid is being used to erect electric fences in Africa to keep elephants away from the fields, to train gamekeepers and even to run a college for gamekeepers.** But Germany is not in a position to erect electrified herd protection fences and an official or police organisation to combat wildlife crime in its own country...! That is absurd.

A generalised hunting of wolves is counterproductive because it disregards the biology and lifestyle of wolves and does not lead to a reduction in livestock damage. **There is no scientific evidence that hunting significantly and sustainably reduces attacks on grazing animals, unless the wolf population is so drastically reduced that it is below the reproduction rate or completely wiped out**, see Evidence-based wildlife management (Reinhardt et al https://doi.org/10.1007/978-3-662-65745-4_9) **Both measures would not fulfil the conservation and protection objectives of the Bern Convention, not even those for the protected species listed on Appendix III of the BC.**

With the introduction of the so-called 'flexibilisation', which means nothing more than shooting wolves without checking the necessity of killing them and without prior judicial review, i.e. whether adequate protection was in place at all, the regionally differentiated population management according to the 'Sweden model', which has long been demanded by the hunting and farming lobby, is to be introduced. **This would also allow the shooting of completely inconspicuous wolves and wolves wandering through by chance. Killing these wolves would be absolutely senseless and would violate Article 9 of the Bern Convention**, according to which killing is only permitted if no other satisfactory solution is available. This 'other satisfactory solution' is called herd protection. **The knowledge of how damage to grazing animals can be reduced and prevented by herd protection measures is also available in Germany.** Many livestock owners have now developed a high level of expertise in this area.

As top predators, **wolves are irreplaceable for stable and healthy ecosystems. Thanks to their remarkable adaptability, wolves are even able to provide their services in a cultural landscape.** The laws of nature also apply in a cultural landscape. Wolves help us to maintain our natural resources and healthy, stable ecosystems. We just have to let them do it and protect them and their habitats. **Wolves are irreplaceable for maintaining biodiversity and their presence can even heal sick ecosystems**, as the example of the reintroduction of wolves in Yellowstone National Park shows. That **this works** not only

in large areas such as Yellowstone National Park **but also in smaller areas such as Fläming in Germany** is shown by a bachelor's thesis by a student at the Eberswalde University for Sustainable Development (HNEE) in Germany: 'Development of the hoofed game population in Fläming against the background of the colonisation by the European wolf' (Eike Schumann, 02.08.2022). In the context of the **EU Nature Restoration Law**, an element of the **Green Deal** to conserve and enhance ecosystems, **the call for ordinary hunting of wolves** and thus their removal from ecosystems **is downright schizophrenic**.

Ordinary hunting of wolves, as is legally possible after downgrading their protection status, hinders demography, genetic exchange and the cross-border networking of wolf populations. However, these factors are essential for the recovery of the species and to ensure the long-term survival of the wolf populations in Germany and Europe, which are still insufficiently connected.

If all dispersing young wolves are shot in a region (wolf-free zones, regionally differentiated population management) and the parents die in their original territory, **the wolves will gradually be eradicated, first locally, then regionally and then nationwide.** This is a fact according to the laws of population dynamics (demographic buffer). This leads to isolated sub-populations, whose population then collapses in a few years (case studies: Sweden and Norway), because no genetic exchange can take place through the immigration of migratory wolves. **This violates the conservation objectives of the Bern Convention and the Habitats Directive.**

The **IUCN criteria still classify the species as vulnerable** because the wolf was hunted to extinction in much of Europe during historical times and has lost more than 50% of its historical range over the last 100 years. There is still enough habitat available, including in Europe's cultural landscapes. Although the species is recovering, it has still not regained 50% of its historical range.

The European Commission's proposal to downgrade the protection status of the wolf does not reflect the will of the majority of EU citizens, as this survey, among others, shows https://www.eurogroupforanimals.org/files/eurogroupforanimals/2023-11/20231129_Survey%20Report%20Large%20carnivores.pdf shows that an overwhelming majority of citizens, even in rural areas, are in favour of maintaining a strict protection status for large carnivores. We would like to draw particular attention to page 8 of this survey, which presents the survey results from Germany: 'Two out of three (**67%**) **respondents** see the killing of individual wolves only as an option if livestock protection measures were implemented and have failed. In contrast, only 1 out of 10 (10%) people do not agree with this line of action. This is a strong statement against constant claims for wolf-free zones and hunting quotas for wolves in Germany.' The results of the EU Commission's 'data collection' in autumn 2023 also support this, see page 4 of the appendix <https://op.europa.eu/en/publication-detail/-/publication/5d017e4e-9efc-11ee-b164-01aa75ed71a1/language-en>

Of the 19,000 e-mails sent, 18,500 could be evaluated. **71% of the respondents were in favour of maintaining the current (strict) protection status of the wolf.** The usual hunting and **killing of wolves**, as well as hobby and trophy hunting, **is viewed very critically by the majority of the population and majority rejected. It is no longer socially acceptable for a tiny minority of people with hunting rights to be granted so much power to pursue their murderous hobby and thus deprive the general public of the experience of wildlife encounters and wildlife watching. Everyone knows that hunters will become redundant when large carnivores return.** Hunting and farmers' associations like to present themselves as the voice of the population, but they are not. Only 18% of those surveyed feel adequately represented by agricultural interest groups, and only 12% by hunters' interest groups. It is no longer in line with the **cultural needs of the majority of the population to shoot nature as you please and simply kill animals that are inconvenient, such as the wolf.**

The proposal for downgrading only serves the interests of the hunting and farming lobby. To vote in favour of this would create **further social discord and undermine democracy and the rule of law, further fuel mistrust of EU institutions, particularly the European Commission, and further erode credibility and trust in EU institutions and the European Commission.**

With regard to the credibility and trustworthiness of the European Commission, we would like to draw attention to the following facts:

At the 42nd meeting of the Bern Convention Standing Committee in December 2020, the **EU had voted en bloc against Switzerland's application to downgrade** the protection status of the wolf. The situation of a species that was once extinct 150 years ago does not change in two years to such an extent that a downgrade would be justified. **Why has the EU now changed its mind?**

After the introduction of the 'Lex Wolf' (§ 45 a of the Federal Nature Conservation Act (BNatSchG)) in Germany, the former EU Environment Commissioner Virginijus Sinkevičius initiated a pilot infringement procedure against Germany in May 2020, see **EU Pilot 2020 (9639)**, because § 45 a BNatSchG violates Article 16 of the Habitats Directive. Why is the procedure not being continued?

The EU Commission has initiated **infringement proceedings against Sweden** because of the way the wolf is being managed, but it has been doing nothing for more than 10 years and is only 'monitoring' the situation in Sweden. Why?

Mrs Ursula von der Leyen is emotionally compromised in this matter because her favourite, completely unprotected pony was killed by a wolf in September 2022.

Regarding 2: Downgrading the protection status could cause irreversible damage. The risk of renewed extinction due to a loosening of the protection status **is very high** and poses a serious threat to the wolf species, which by nature has small population sizes and suffers from a lack of genetic heterogeneity due to historical persecution.

The downgrading of the wolf's protected status will be irreversible and represents an indictment of the federal government, the state governments and the authorities. In Germany, the know-how and the financial and material resources for livestock protection measures to protect grazing animals are available. Nevertheless, the necessary measures have been irresponsibly neglected in many regions of Germany. This violates the precautionary principle.

Giving in to this request for downgrading ultimately means giving in to the hunting and farming lobby and finally giving them their way, the wolf trophy. The situation in other European countries, where wolves are hunted and their populations are stagnating or in some cases drastically declining, shows the hopeless struggle that nature and species conservationists are fighting against hunters.

There are individual wolves that have learned to overcome fences by means of improperly installed or operated livestock protection fences and/or non-electrified anti-swine-fever fences. Only the killing of such wolves would make sense in some cases. A method should be developed to ensure that the so-called problem wolf is actually removed. However, **lowering the protected status** of a once-extirpated and still-endangered species **in order to hunt it, thereby risking further genetic impoverishment and re-extirpation, is completely out of proportion. The measure of hunting is not suitable for the goal of protecting grazing animals**, because unprotected or poorly protected grazing animals would continue to be at risk of attack. **There are milder means to achieve the goal** than killing wolves.

The fact that **hunters** are not able to identify the 'right' wolf is shown by the many **so-called shooting errors in Germany**. Lower Saxony stands out again in this regard. Hunters cannot distinguish males from females, adults from yearlings and pups. **To distract from their inability or unwillingness to identify the 'right' wolf, they demand the general shooting of all wolves in a region or in all of Germany.**

The demand for general hunting is justified by the fact that the killing of wolves that have attracted attention is not possible under current nature conservation law and the status of 'strictly protected', as various court decisions would show. **This is also a lie. The exceptional licences for the killing of wolves** were stopped by courts because these exceptional licences were **illegal**, specifically the requirements of Article 16 Habitats Directive and § 45 (7) BNatSchG were not met, **because there was insufficient or no herd protection**. In all cases, grazing animals were killed that were not or insufficiently protected. **We have numerous examples of this.** Wolves that kill unguarded or poorly guarded livestock are not problem wolves. Furthermore, **fences are tampered with and sick or weak livestock are left as bait to provoke the wolves into attacking** and obtain a permit to shoot them.

Further 'flexibilisation' along the lines of the European Commission's proposal is **not necessary**. It is already legally possible to kill so-called problem wolves, cf. Article 9 BK, Article 16 Habitats Directive and § 45 (7) BNatSchG.

Regarding 3: The Council of EU Environment Ministers met on 14 October 2024. At the previous meetings of this Council, the required majority for the decision on the proposal of the EU Commission was not reached. A decision on 14 October would have been too late, as the application deadline according to the BK could not have been met, i.e. the application would not have been received two months before the meeting of the Standing Committee of the BK from 2-6 December. Therefore, Mrs v. d. Leyen pushed for a decision in the **EU Competitiveness Council, which is not technically responsible for nature and species conservation issues**. We therefore believe that the application is not admissible because it was decided by a body that was not responsible.

Regarding 4.: The Council's decision is politically motivated, not based on reliable scientific knowledge, requirements and data, and, on top of that, ignores scientific facts about the biology of the wolf to the detriment of the entire European nature and species protection and biodiversity. It jeopardises everything that has been achieved so far to restore a favourable conservation status for the wolf and is not compatible with the objectives of the Bern Convention.

Wildlife crime

On 7 April 2023, a severed wolf head was found in front of the NABU Species Conservation Centre in Leiferde, Gifhorn district in Lower Saxony (Germany). **Take a close look! This is why the wolf must remain strictly protected from humans! People have done this.**



Annex 4: Map

Anlage Karte Wolfsvorkommen in Deutschland

BfN Bundesamt für Naturschutz (Federal Agency for Nature Conservation)

Wolf populations in Germany in the monitoring year 2022/2023 (1.5.2022 - 30.4.2023)

Wolfsvorkommen in Deutschland
im Monitoringjahr 2022/2023
(1.5.2022 - 30.4.2023)

- 10 km x 10 km Raster
- Nachweise gem. Monitoringstandards



Annex 5: Lower Saxony Livestock Depredation Table (see [attachment](#), in German)

Annex 6: Table on the reported damage cases involving livestock in the Free State of Saxony in the year 2024 (see [attachment](#), in German)

Annex 7: Important excerpts from "Assessment of the conservation status of the Wolf (*Canis lupus*) in Europe" (Boitani et al., 2022)

The introduction discusses the status of the wolf in Europe. It is mentioned:

"In the last ten years alone, an increase of over 25 % in the range of wolves has been reported in Europe (Cimatti et al., 2021)."

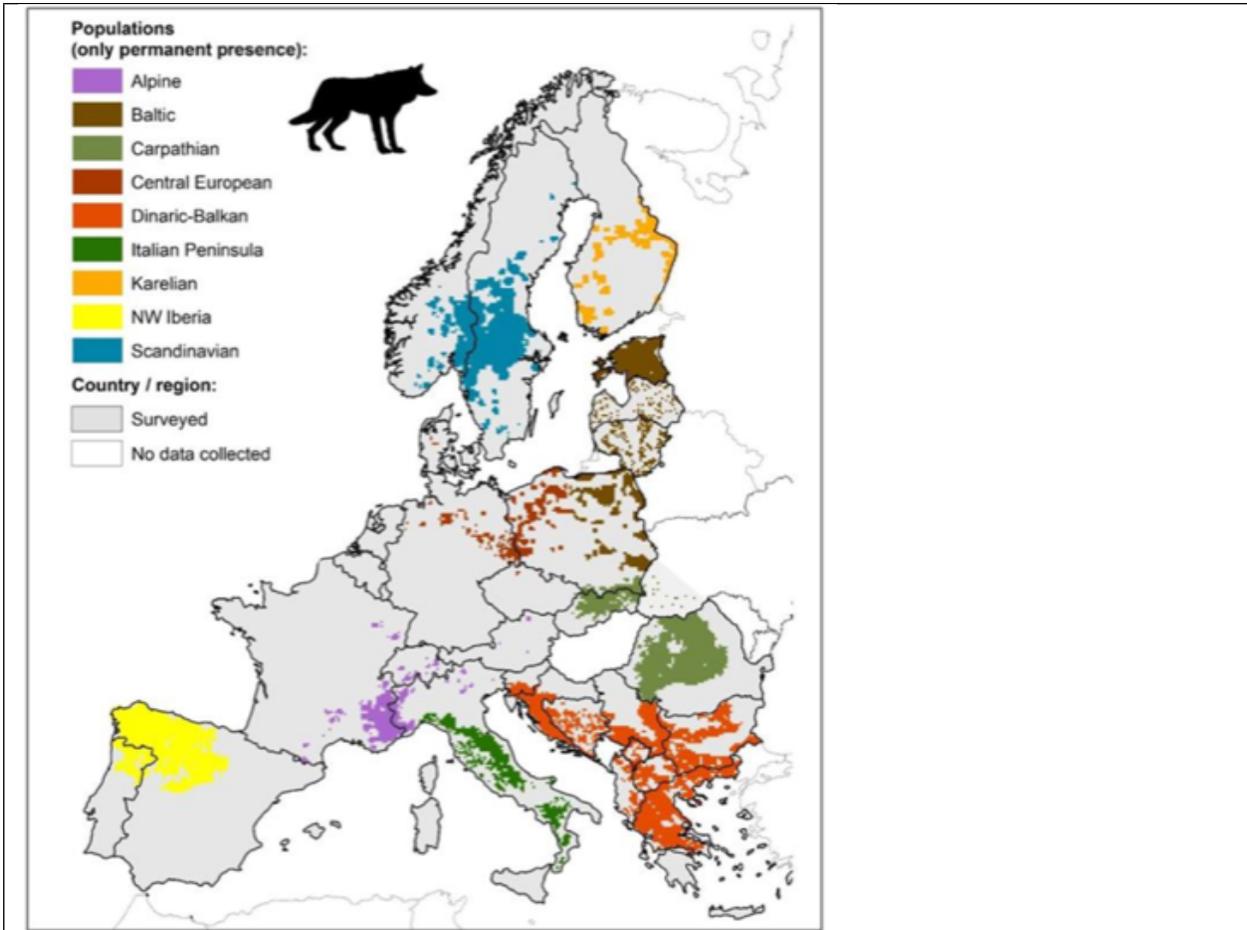
It is emphasised that the wolf's range continues to expand and that it is strictly protected in countries where it was previously extirpated:

"On the one hand, in the absence of large wilderness areas in Europe (Venter et al., 2016), wolves have re-established their populations almost entirely in heavily human-modified landscapes where humans raise livestock, hunt wild ungulates and use forests and mountains for tourism and recreation (Chapron et al., 2014, Bautista et al., 2019). Currently, permanent wolf territories are characterised by an average density of 90 individuals/km², reflecting a high degree of adaptation to human presence. On the other hand, wolves often pay a high price for sharing habitat with humans, as shown by the persistently high numbers of illegal killings in several European countries (Kaczensky et al., 2012), which are often associated with low trust in policy and major social conflicts.

The generally ineffective policies implemented in many European countries to address various aspects of the interface between human activities and wolf conservation **have not resolved the conflicts**. These conflicts have also triggered processes to amend European legislation, including greater flexibility in the application of derogations from strict protection (Meuret et al., 2020) or the removal of wolves from strict protection status (Annex IV of the Habitats Directive) to protected status (Annex V of the Habitats Directive) and/or from Annex II to Annex III of the Bern Convention."

"This report focuses on the most up-to-date (2022) information on wolf numbers*, trends and the main threats and conservation measures at country, population and pan-European level. This information is used to provide an updated assessment of the conservation status of the wolf in Europe at the continental level (all countries except the Russian Federation, Belarus, Moldova and Ukraine outside the Carpathian Mountains), at the level of the EU-27 (where the Habitats Directive applies) and the nine main wolf populations in Europe (Fig. 2), reflecting the scale at which ecological processes occur."

Figure 2 shows the nine most important wolf populations in Europe:



The next section (Methods) deals with the data on which the study is based. These are listed for all European countries in Table 1 (self-explanatory, total table not translated) for the corresponding year (see original paper). The source for this is generally the information provided by the countries themselves.

For Germany:

Country - National wolf population	Estimated year	Mean estimate of individuals	Measure of uncertainty (e.g. 95% CI, SD, minimum number)	Current population development (since 2016)	Different European wolf populations in the country	Conversion factors for converting packs/pairs into numbers	Wolf territory monitored for the most recent wolf population estimate
Germany	2020 / 2021	158 packs, 27 pairs	Minimum number	Increasingly	1 Population	None	Complete survey (the largest part of the known wolf area)

It then lists the protection status of the wolf in the various countries (Table 2). For Germany this is, as is known, FFH Annex II and IV as well as Bern Convention Annex II. It is also stated that it is strictly protected in Germany by the Federal Nature Conservation Act and that management plans apply in the federal states (Table 2).

Table 3 shows the documented livestock damage. For Germany in 2021, this was 2881 sheep and goats killed, 281 cattle, 16 horses/donkeys and 5 (6) dogs. In 2021, the sum of 498,433 euros was spent on

compensation payments in Germany and it is mentioned that this is only paid for documented cases and only in the case of minimum protection. In addition, there were only three cases of wolf-dog hybridisation in the previous 21 years.

Threats to wolf conservation are discussed in the next chapter. Roads, illegal killings and disturbance from tourism activities are reported in more than a quarter of all countries, followed by other disturbances from construction, industrial development and forestry (Figure 3).

Section 3 looks at the status of wolves at population and continental level. The information for Germany is summarised here with only one population, the Central European population:

"This population is spreading rapidly from its core area in the western half of Poland and the eastern part of Germany into the Central European lowlands. There are also several packs in the Czech Republic. This spread is likely to continue. Red List category: Threatened with extinction. The population has grown very rapidly since 2000 and is now estimated at around 1850 individuals. This population is very dynamic and dispersing animals have reached all Central European countries, with confirmed packs in Austria, Denmark, Belgium and the Netherlands. In the German part of the population, dispersal is mainly north-westwards, while south-westwards dispersal is slower. Although the geographical gap between the Central European population and the Baltic population is almost closed, the genetic exchange between these populations still seems to be limited. New connections with the expanding populations in the Alps are also likely to emerge soon. However, the increasing number of fences erected to contain African swine fever could become a serious threat as it contributes to the fragmentation of populations."

Section 4 deals with the assessment at the biogeographical region level. Assessing species at the biogeographical region level is a necessary step in assessing conservation status under Article 17 of the Habitats Directive and Resolution 8 (2012) of the Bern Convention, and forms the basis for assessing the adequacy of Natura 2000 and the Emerald network. It is mentioned that this is relatively difficult for wolves for the following reason: "**However, a meaningful assessment of wolves at this level is hampered by several obstacles.** Firstly, the biogeographical regions are not contiguous tracts of land where population dynamics and source-sink dynamics (e.g. dispersal) can occur naturally. For example, the Alpine biogeographical region consists of at least 10 distinct and isolated land areas stretching from the Pyrenees to the Rodopi. Secondly, the biology and management of wolves in a given biogeographical region are the result of very different conditions under a variety of influences, each with its own pattern on a given area. This makes the application of Red List criteria theoretically possible, but meaningless from a biological and conservation perspective. Thirdly, the boundaries of biogeographical regions have been defined on the basis of criteria other than the biology of medium and large mammals, which means that the boundaries often run through the centre of populations whose health and viability depend on their integrity and continuity. Fourthly, the number and status of wolves contributing to different biogeographical regions in different European countries is difficult to assess and is often limited to a few individuals with large margins of uncertainty. The nine wolf populations we use here for assessment were explicitly proposed and adopted at EU level to overcome the inherent limitations of the concept of biogeographical regions when applied to large carnivores."

"Taking these caveats into account, from a purely numerical (composite) perspective, all biogeographical regions of Europe with wolves would fall into the 'Least Concern' category of the Red List, with only two possible exceptions: The Pannonian region is only marginally populated by wolves and would probably be categorised as "Endangered", as would the Atlantic region, as wolf populations in this region are still developing. The Arctic and Black Sea biogeographical regions would likely be categorised as Endangered or Critically Endangered as they are only on the fringes of wolf ranges in Europe."

It should be noted that in this section the category "least concern" refers only to the biogeographical regions in which wolves occur, not to the wolf population itself.

"As management is currently carried out at national level, the reference status for defining and monitoring management measures must necessarily be at national level. Wolf status in European countries varies

according to the size of the country, local ecological and socio-economic conditions, the degree of tolerance of conflicts between wolves and livestock, the effectiveness of preventive and compensatory measures to reduce and mitigate conflicts, the number and density of wild prey, the phases of historical return of wolves to their original ranges and other factors. The lack of formal agreements on sharing responsibility for management at the international level (either at the pan-European level or between some neighbouring countries) and the resulting limitation of responsibility to the national level leads to the paradox that wolf management must be carried out as if there were as many independent wolf populations in Europe as there are countries. The assessment of the Red List at national level reflects this situation. The result of this situation is that several small countries have and will always have a small number of wolves that need full protection, although there is a continuous distribution of wolf populations in neighbouring countries. Very few European countries are large enough to harbour a fully viable (non-threatened) population themselves.

The assessment of wolf status and wolf management is best carried out at the intermediate level between the pan-European and the country level, i.e. at the population level. The conservation status of the 9 most important biological wolf populations is assessed as "Least Concern" or "Near Threatened", with the exception of the Scandinavian population, which is categorised as "Endangered". Formally coordinated management at the population level would offer more opportunities and flexibility than at the national level due to the size and favourable demographic trends of most populations. However, management at this level requires the formal approval of an action plan that is agreed and implemented by all participating countries. Applications to manage a local/national population based on continuity with neighbouring countries but without a formal joint action plan are not acceptable, as the impact of management decisions at the local level would inevitably feed back to the population as a whole. Despite the obvious advantages of the population-level approach and the widespread cooperation at technical level in monitoring and research, no neighbouring European country has yet committed to a formal institutional action plan for a joint population.

Despite the overall positive trend for Europe's wolves, there are a number of threats that need to be monitored or addressed. In addition to the known threats to the conservation of European wolves (e.g. predation on livestock, competition with hunters for wild prey, human fear and intolerance), at least four new threats require special attention and targeted action. Firstly, the border fences being erected to control human migration and the veterinary fences being built to control the spread of African swine fever in feral pigs are having an increasingly serious impact on links to the east and within populations of several eastern and central European wolf populations. These fences will soon affect the viability and conservation status of several wolf populations. Secondly, the status of the large wolf populations scattered across the Balkans suffers from a lack of detailed monitoring, poor hunting management and regulation, widespread illegal killing and a general lack of political and institutional support for their conservation. This region is currently the highest priority across Europe for the conservation of wolves and other large carnivores and needs support to assess the connectivity, status and trends of populations and ensure that current removals and lethal control are sustainable. Thirdly, wolf-dog hybridisation is creeping up in several southern and eastern wolf populations: there is an urgent need to adopt adequate strategies and take appropriate management measures to prevent the spread of this serious threat. Finally, there are many areas where social conflicts over wolves (typically cases where wolves become a symbol of larger societal divisions or tensions) are high and/or increasing, and where these conflicts are instrumentalised in larger political struggles. Such situations threaten to reduce public tolerance of wolves and undermine the role of science in guiding wolf management."