



Strasbourg, 3 March 2023

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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

43<sup>rd</sup> meeting

Strasbourg, 28 November - 1 December 2023

**New complaint (pending): 2022/03**

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

**- GOVERNMENT REPORT -**

*Document prepared by  
The Royal Norwegian Ministry of Climate and Environment*

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Ursula Sticker

Your ref

Our ref  
22/880-11

Date  
3 March 2023

**Government report – Complaint No. 2022/03 *Wolf Culling Policy in Norway***

We refer to your letter dated 7th October 2022, where you request a progress report from the Norwegian authorities on Complaint No. 2022/03, in order to assess the complaint.

**Population figures of the Southern Scandinavian wolves and population variability analysis**

We refer to appendix 1 "Trends in the wolf population in Norway and Sweden from 1998/1999 – 2021/2022". During winter 2021-2022, 55 family groups were documented in Scandinavia: 42 within Sweden, nine across the Norwegian-Swedish border and four within Norway. 28 territorial pairs were confirmed; 23 within Sweden, none across the border and five within Norway.<sup>1</sup> As shown in appendix 1, the wolf population in Norway and Sweden increased during this period.

The genetic ancestry of the Norwegian-Swedish wolf population has been debated between interest groups since it was re-established around 1980. Norwegian University of Science and Technology (University Museum) was after a tender competition assigned to re-investigate the origins of the Norwegian-Swedish wolves, as well as investigate the degree of hybridization between dogs and wolves. The technology used was whole-genome sequencing, and the dataset was comprehensive. The report concluded that Norwegian-Swedish wolves are genetically closely related to contemporary Finnish wolves, and they carry some of the lowest levels of dogs ancestry in comparison to other wolves found globally.<sup>2</sup> The genetic drift is known to be high, 160 000 SNP alleles from the three first founders became lost over a period of 30 years.<sup>3</sup>

<sup>1</sup> [NINA Brage: Bestandsovervåking av ulv vinteren 2021-2022](#)

<sup>2</sup> [Innhold rapport\\_2013Ksi \(ntnu.no\)](#)

<sup>3</sup> [Whole-genome resequencing of temporally stratified samples reveals substantial loss of haplotype diversity in the highly inbred Scandinavian wolf population - PubMed \(nih.gov\)](#)

#### **Data concerning predation in comparison to other threats to livestock and domesticated reindeers**

Wolves are not a dominant cause of loss for either sheep or domestic reindeer in the national statistics of losses. Losses to large carnivores are dominated by predation by lynx and wolverine. Other causes of loss can be accidents, disease, hunger, climatic conditions, poor grazing, drowning, traffic, loss to foxes or dogs, etc. However, data on such causes of loss are absent, as there is systematic collection and compilation of data on carnivore losses only.

However single individuals of wolves that encounter free grazing sheep or domestic reindeer are known to be able to injure and kill many prey individuals within a short time. Individual wolves are proven to have killed and injured hundreds of sheep during a single grazing season. As predation is not evenly distributed, predation by carnivores may make up a significant proportion of the total loss for individual farmers. For more data on losses and statistics, we refer to <http://www.Rovbase.no> (choose English language).

#### **When damage is considered serious**

According to the data presented above, large carnivore predation accounts for a limited proportion of the total number of livestock (sheep) and semi-domesticated reindeer lost while grazing. Within the losses of sheep and semi-domesticated reindeer compensated as preyed by large carnivores, losses to wolves over the last five years amounts to approximately 10 percent and 1 percent, respectively. There is no semi-domesticated reindeer and a limited number of free-grazing sheep within the wolf management area (the wolf zone). Thus, predation by wolves occur more frequently outside the management area.

Outside the wolf zone, livestock grazing is prioritized, and the management principles of geographic differentiation limits the extent to which preventive measures shall be implemented. This indirectly affects the damage potential, and thus the assessment of the scope and seriousness of damage that must be fulfilled for the requirement of Article 9 (1) second indent to be met. Outside the wolf zone any presence of wolves is in principle considered to constitute a certain potential for damage, and, as a result the threshold for when culling is permitted is lowered. Considering that there is limited livestock grazing and no semi-domesticated reindeer in the wolf zone, the damage potential is therefore substantially lower compared to outside the wolf zone, and the assessment of when damage is considered serious is conversely elevated.

#### **Alternative solutions to the culling policy**

Whether the criterion of Article 9 (1) that the purpose of the removal cannot be achieved in any other satisfactory manner is met is considered in each decision regarding permits of culling. Which alternative solutions are considered vary, among other things, according to the objective of the removal and whether the wolves are located inside or outside the wolf zone.

Outside the wolf zone, there are generally few alternative solutions that are considered sufficient to fulfil the objective behind the decisions to permit culling. Based on the historical extent of damage and future potential for damage, there are seldom any alternative solutions considered satisfactory to prevent damage to livestock and/or semi-domesticated reindeer. This is closely linked with the zone-based area management, which entails that other public interests than the conservation of wolves is prioritized outside of the wolf zone. This limits the extent to which the practice of livestock grazing or the herding of semi-domesticated reindeer outside the wolf zone can be required to adapt to the presence of wolves. Alternative solutions to culling such as fencing in livestock, are therefore seldom deemed satisfactory.

As the population target is primarily to be met within the wolf zone, the wolves found outside this area are mainly young, dispersing individuals, which experientially account for most of the damage caused by wolves in Norway. These individuals can also cover large areas and their movement is unpredictable. Predicting to a satisfactory degree which areas that need adaptation of livestock grazing before the damage occurs will therefore be difficult. In a few instances, when genetically important wolves from Finland/Russia are detected outside the wolf zone, relocating wolves has been considered a satisfactory alternative solution to culling. Both tracking and relocation of wolves requires great resources and may have negative effects on the wolves and are therefore not suitable for all wolves outside the wolf zone.

Within the wolf zone, wolves are subject to stricter protection compared to those outside the zone, and correspondingly, other interests such as the livestock industry must in principle adapt to the presence of wolves. Such adaptations were made when the wolf zone was established. Today there is little to none free-grazing of livestock within the wolf zone, and little potential for damage from wolves.

Within the wolf zone, decisions to permit culling are generally made with the objective to safeguard other public interests of substantial importance. Part of the underlying rationale behind the population target set by the Norwegian Parliament is to reduce the amount of conflict connected with the presence of wolves in affected local communities. When the Norwegian population of wolves exceeds this target and the government assess that culling in order to reach this target will contribute to reducing the level of conflict and increasing trust in the management of large carnivores, other alternatives can hardly fulfil the objective behind the decision.

#### **Measures in place to compensate loss of livestock and to address public health and safety**

The Nature Diversity Act article 19 first sentence states; *"When livestock and domestic reindeer are killed or injured by predatory game, the state provides full compensation for the loss and the associated costs in accordance with regulations issued by the King".*

There are regulations to compensate for loss of; domestic reindeer, sheep, goat, cattle, horse, herding dog, guard dog and hunting dog in use during legal hunting, legal training or



hunting dog trials, who are killed or injured by wolf, bear, lynx, wolverine, or golden eagle. The compensation is based on findings of animal cadaver killed by predators, but also loss that is probably caused by wolf, bear, lynx, wolverine, and golden eagle will be compensated. More than 90 % of the compensation payments are made because predators are considered the probable cause of damage, and not based on a found animal cadaver. Mostly sheep and domestic reindeer are compensated. We refer to appendix 2.

The criterion of Article 9 (1) third indent "in the interest of public health and safety" is generally not used for wolf culling in Norway.

#### **Why introducing genetically different wolves is not considered feasible**

Directly introducing wolves from other populations into Norway, has not been considered as an alternative to improve the genetic situation. Norwegian wildlife management authorities have been reluctant to implement actions which includes translocation of all wildlife species to Norway to either establish or supplement a wildlife population. The ongoing general debate on wolf management and population size would not benefit from a man-made introduction of wolves either. Thus, any such introduction would increase conflict levels. On the other hand, in-land translocation of genetically important wolves has been necessary to avoid establishment of wolves-territories in areas prioritized for sheep and reindeer grazing. The natural dispersal of new individuals from the population in Finland/Russia have so far been considered sufficient to supplement the genetic status of the population.<sup>4</sup> A updated family tree of the whole population is made every year.<sup>5</sup> We refer to appendix 3.

#### **Cooperation with the Swedish authorities**

In 2020 the management authorities in Finland, Norway, and Sweden made the first tri-lateral framework for transboundary cooperation on management and conservation of wolves in Fennoscandia. The framework itself and the actions outlined in it will be evaluated and revised every six years in accordance with the reporting cycles of the EU Habitats Directive (Sweden and Finland are members). The framework from 2020 is valid through 2025.<sup>6</sup>

The framework has detailed descriptions of how the management is done in each of the three countries. The Swedish Environmental Protection Agency and the Norwegian Environment Agency have joint Scandinavian guidelines and instructions for monitoring of wolves; these guidelines have been used since winter 2014-2015. Wolves in Sweden and Norway represent a cross-boundary wolf population. In both countries, the wolf population is being monitored each winter.

Norway and Sweden have a common database where all the observations of wolves are stored. The last two years there have also been cooperation between the Regional boards for management of large carnivores in region 4 and 5 (in Norway) and the County

<sup>4</sup> Genetic rescue in a severely inbred wolf population - Åkesson - 2016 - Molecular Ecology - Wiley Online Library

<sup>5</sup> <https://www.slu.se/globalassets/ew/om/centrb/vsc/vsc-dokument/vsc-publikationer/rapporter/2022/slakttrad-skand-varg-2021-version1-1.pdf>

<sup>6</sup> <https://www.miljodirektoratet.no/aktuelt/nyheter/2020/oktober-2020/samarbeidet-om-ulveforvaltning-i-norden-styrkes/>

Administrative Board in Värmland (in Sweden) in order to make common decisions about which of the cross-border packs to save and which of them to choose for culling.

#### **Update on internal court proceedings**

The bureau should be advised of two court proceedings, one ongoing and one recently concluded.

The Ministry's decision of December 31<sup>st</sup>, 2019, to allow the culling of one wolfpack within the wolf zone, was brought before the Oslo District Court by the organization «NOAH – for dyrs rettigheter» in the spring of 2020. In the summer of 2022, the Borgarting Court of Appeal found that the decision was unlawful.<sup>7</sup> This verdict was subsequently appealed by the state and is therefore not final. The Norwegian Supreme Court has allowed the appeal submitted, and proceedings will take place between April 25<sup>th</sup> and 27<sup>th</sup>, 2023. The substantial legal question the Supreme Court will decide on, is whether the decision to permit culling fulfils the criteria of the Norwegian Nature Diversity Act Article 18, and the alternative objective "to safeguard [...] other public interests of substantial importance".

The Norwegian Government's view is that the decision in question was lawful, as the culling was not detrimental to the survival of the population and that the culling was decided to achieve lawful objectives that could not be achieved in any other satisfactory manner. For elaboration on our understanding of what constitutes "overriding public interests", cf. the criterion correspondent to Article 9 (1) third indent, we refer to our letter dated July 27<sup>th</sup>, 2022.

Furthermore, there has been court proceedings regarding culling in the wolf zone in the winter of 2023.<sup>8</sup> Three organization, «NOAH – for dyrs rettigheter», «WWF Verdens naturfond» and «Våre Rovdyr», filed a claim for a temporary injunction against the Ministry's decision of December 20<sup>th</sup> 2022, to permit the culling of three wolf packs within the wolf zone. The proceedings concluded on February 3<sup>rd</sup>, 2023, when the Court of Appeal rejected the claim for an injunction. In its assessment the court found that the criteria of the Norwegian Nature Diversity Act Article 18, and the alternative objective "to safeguard [...] other public interests of substantial importance", was fulfilled, and that the decision to permit culling was lawful. The court proceedings regarding a claim for a temporary injunction in the beginning of 2022, had the same outcome.

Yours sincerely

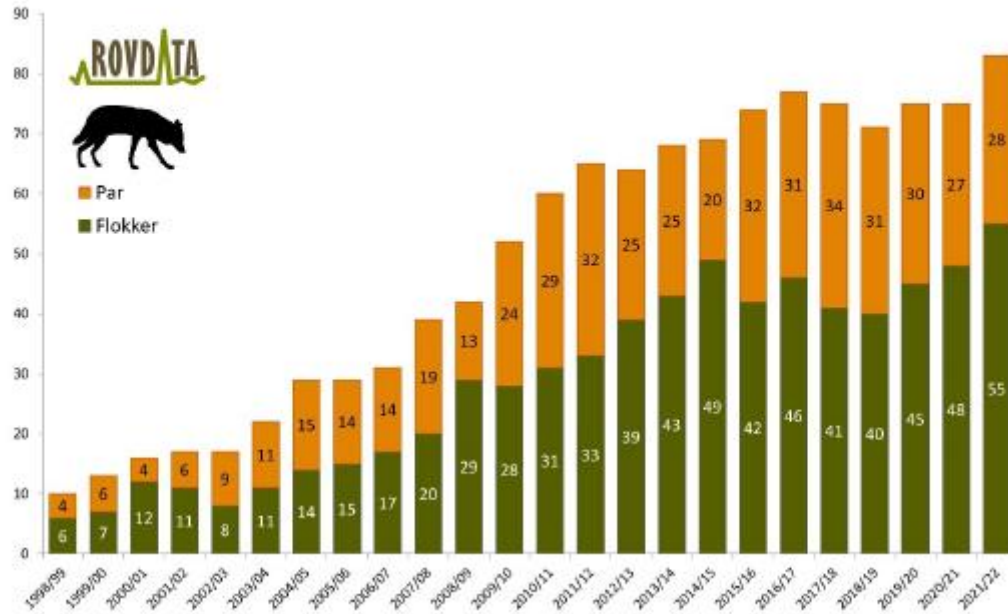
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<sup>7</sup> Decision July 6<sup>th</sup>, 2022, LB-2021-145082. (Only available in Norwegian)

<sup>8</sup> The wolf packs in question resided on both sides of the border between Norway and Sweden, in the areas Juvberget, Ulvåa and Kockohoncha. In accordance with the guidelines for cooperation for the Norwegian-Swedish wolf population, the decision was made after contact with the Swedish authorities, who also decided to permit culling of the wolf packs in question in 2022-2023.

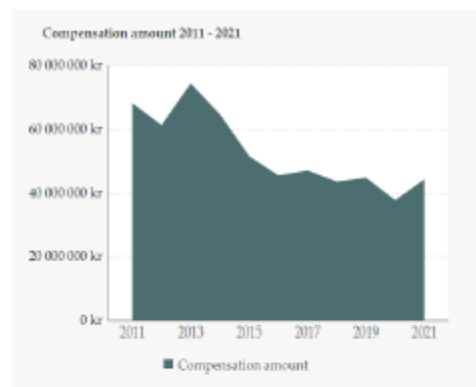
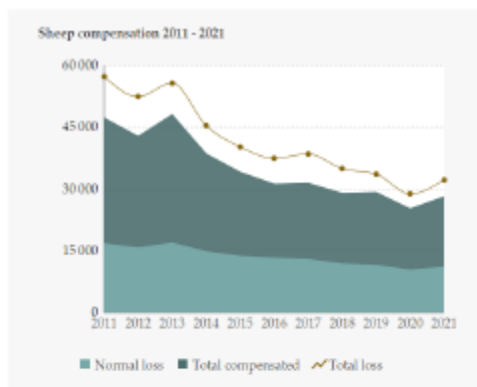
## APPENDIX I

Appendix 1. Trends in the wolf population in Norway and Sweden from 1998/1999 – 2021/2022

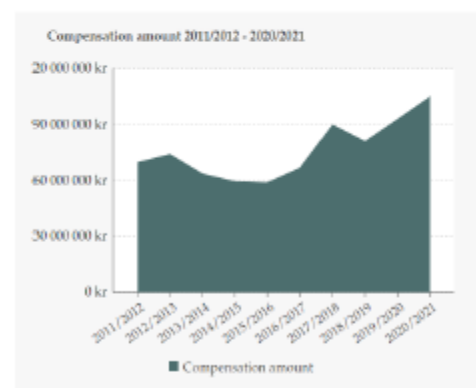
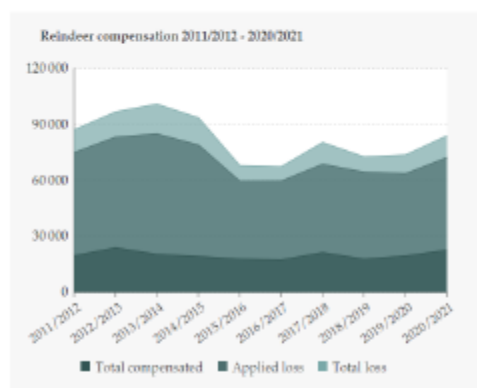


## APPENDIX II

## Appendix 2 - Compensation of loss of livestock



*Sheep compensated as killed by wolf, bear, lynx, wolverine, and golden eagle the last decade counted in numbers of animals and compensation amount in NOK<sup>4</sup>*



*Domesticated reindeer compensated as killed by wolf, bear, lynx, wolverine, and golden eagle the last decade counted in numbers of animals and compensation amount in NOK<sup>2</sup>*



### APPENDIX III

#### Appendix 3 – family tree of the wolf population

*The family tree shows new pairs with pups for the first season, from 1983 to 2021. The white circles (marked IM) in fig. xx shows when immigrants have been registered as parents in established couples.*

