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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

44th meeting
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Complaint on stand-by: 2023/03

**New wolf culling policy
(Switzerland)**

- COMPLAINANTS' REPORTS -

Document prepared by

Verein CHWOLF, Avenir Loup Lynx Jura (ALLJ)



Verein CHWOLF
Nüburg 1
CH-8840 Einsiedeln

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

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

Einsiedeln, den 04. November 2024 / cs

Complaint No. 2023/3: Possible File: Switzerland: New wolf culling policy Supplementary information

Dear Sir or Madam

In your letter dated 11 October 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

The 2nd regulation period began on 1 September and will last until 31 January 2025. The same regulatory requirements apply again in accordance with the provisionally enacted Hunting Ordinance as in the first regulation period, which took place from 1 December 2023 - 31 January 2024.

Conditions for pack regulation

- **Shooting of an entire pack: 1 livestock kill in protected herds is sufficient to wipe out an entire pack** (in the 12 months prior to submitting an application, the pack must have caused damage or shown conspicuous behaviour towards humans and the threshold value of the regulation region must have been exceeded).
- **Shooting of 2/3 of the pups:** packs that have not caused any damage to protected herds and have not shown any negative behaviour towards humans may not be completely eliminated. However, as a so-called "**basic regulation**", 2/3 of all pups born in the current year may be shot in these completely inconspicuous packs. (If there is only 1 pack in the regulation region, only ½ of the pups may be shot)

The term "**basic regulation**" is new and is mentioned for the first time in the current regulation period by the Canton of Graubünden. What was approved by the FOEN in isolated cases during the first regulation period is now being utilised on a large scale by the Canton of Graubünden, applied for and implemented following approval by the FOEN. This means that 2/3 of the pups in all reproducing packs will be allowed to be shot. According to the Canton of Graubünden, this so-called basic regulation "serves to maintain shyness towards humans. Limiting the size of packs also aims in particular to reduce the risk of attacks on large livestock and professionally protected farm animals."

Wiping out entire packs on the basis of a single attack and shooting 2/3 of all pups in completely inconspicuous packs is neither proportionate nor compatible with Article 9 of the Bern Convention! Moreover, the newly used term 'basic regulation' is neither defined nor mentioned in the Hunting Act nor in the Hunting Ordinance.

Implementation in the Canton of Graubünden

The collective application of 15 August 2024 and two further applications submitted later by the Canton of Graubünden were approved in full by the FOEN. Graubünden is authorised to shoot 2/3 of all pups confirmed this year (basic regulation) and 3 packs may be eliminated completely. This means at least 55 - 60 wolves, of which 41 pups. Of the 13 packs confirmed in the canton, 11 packs may be regulated. In the remaining two packs, no pups or only 1 pup were detected, so no basic regulation can take place. Status as of 30/09/2024.

Even the National Park pack (Fuorn) may be completely eliminated

It is difficult to understand why the FOEN has authorised the Canton of Graubünden to eliminate the entire Fourn pack, which has its territory mainly in the Swiss National Park SNP, the **core zone of the UNESCO biosphere reserve**. This was the result of two bovine species being killed on the edge but outside of the National Park area. DNA traces of a young female wolf from the Fourn pack were found in the first kill, but she has not been travelling in the family group for some time. Whether the second animal was killed by the Fourn pack had not even been conclusively determined at the time the shooting licence was issued. The shooting order only applies outside the National Park area (core zone), but within the maintenance and development zone of the UNESCO biosphere reserve. The shooting of the entire National Park pack due to this damage is absolutely disproportionate and torpedoed the basic idea of the UNESCO biosphere reserve. Ecological interrelations and the objectives of the National Park are being completely disregarded or ignored.

The Swiss National Park SNP has been a strictly protected nature reserve since 1914 and has been classified as a strict protection reserve by the IUCN. According to the Federal Act on the SNP in the Canton of Graubünden (National Park Act) of 19 December 1980 (as of 1 January 2017), Art. 1, para. 1, the Swiss National Park is '... a reserve in which nature is protected from all human interference and in particular the entire animal and plant world is left to its natural development'. The protection of the wolf is thus also embodied in law in the SNP.

>>> Link [Statement of the Swiss National Park on the shooting order for the Fuorn wolf pack](#)

>>> Link to the press release issued by the Research Commission of the Swiss National Park on 20 September 2024 '[Shooting of the wolf pack in the National Park not indicated from a scientific point of view](#)'

CHWOLF is considering submitting a complaint to UNESCO in this regard.

Implementation in the canton of St. Gallen

The Canton of St. Gallen has received authorisation from the FOEN to shoot ½ or 2/3 of the pups in all 3 packs that have their territory in the canton. As the 3 packs are each located in a different regulation region and the regulation threshold has not been reached in regions II and III, St. Gallen is not allowed to eliminate any packs completely. The Calanda2 pack has its territory in the Canton of St. Gallen and the Canton of Graubünden. This application was submitted by both cantons together and approved by the FOEN, even though the Calanda2 pack has so far been completely inconspicuous.

Supplement 1: Detailed information on the shooting requests in the cantons of St. Gallen and Graubünden (The joint shooting application from the cantons of SG and GR dated 10.09.2024 also includes the applications from the Canton of GR for the Fourn, Lenzerhorn, Jatzhorn and Calanda2 packs. We have not received the dossiers directly requested from the canton of GR).

Implementation in the Canton of Valais

The Canton of Valais has applied to the FOEN to shoot 4 entire packs. On 9 September 2024, the FOEN approved the culling of the entire Nanz pack. The applications for the other 3 packs (Augstbord, Les Toules and Hérens-Mandelon) were rejected by the FOEN during the technical review.

Four days after the applications were rejected, a constructive meeting between State Councillor Frédéric Favre (VS), Federal Councillor Albert Rösti and FOEN Director Katrin Schneeberger took place on Friday 13 September 2024 at the request of the Canton of Valais. On the following Monday, 16 September 2024, the Canton of Valais sent an application for reconsideration with an addendum to the rejected applications to Bern, referring to the 'pleasant meeting with Federal Councillor Rösti'. The addendum cited the damage apparently caused to the Augstbord pack shortly beforehand. In the case of the Les Toules pack, the Canton of Valais emphasises that 'a single sheep killed must be enough to justify the shooting of an entire pack'.

On the same Monday, the FOEN approved the supplementary application for the Augstbord pack and the application for the Les Toules pack was reassessed (without any new facts!) and also accepted. On the same evening, FOEN Director Katrin Schneeberger signs the consent decrees for the shooting of the Austbord and Les Toules packs.

Supplement 2: Article «Rösti mischte sich höchstpersönlich ein» (Rösti interfered in person) published in «Der Bund» on 28.09.2024

On 9 October 2024, the authorisation to shoot the entire Hérens-Mandelon herd followed, based on a further addendum that was submitted because of a single sheep that was killed in a protected herd on 14 September 2024.

The FOEN must always examine the cantonal shooting applications seriously and competently and its decisions must not be influenced by a dialogue between politicians or personally dictated from above by the head of the department. Such an approach suggests that the application and authorisation practice of proactive wolf regulation is handled in an arbitrary and dubious manner and only serves a single goal: the greatest possible exploitation of the legal possibilities created by the authorities themselves (Hunting Ordinance) to massively and unselectively decimate the wolf population nationwide. This shooting policy has nothing to do with scientifically sound and nature-friendly wolf management.

Supplement 3: Detailed information on the shooting requests in the Canton of Valais

Implementation in the Canton of Vaud

On 14 August 2024, the Canton of Vaud submitted a regulatory application to the FOEN for the removal of the entire Mont Tendre pack, which was approved by the FOEN on 3 September.

Implementation in the Canton of Ticino

The Canton of Ticino has been authorised by the FOEN to shoot 2/3 of the pups of the Onsernone pack and the Val Colla pack. In the Carvina pack, 2/3 of the pups may also be shot as soon as the canton can provide proof that two or more pups were born this year.

>>> Link ['Fact sheet - Second preventive regulation of wolf packs: state of play'](#) from FOEN 17/09/2024

2. Kills are falling massively thanks to herd protection

Thanks to improved herd protection, the number of kills had also fallen massively by the end of September in 2024. In the Canton of Graubünden by 35% and in the Canton of Valais by 15%. In

2023, the number of kills had already fallen by 40% across Switzerland compared to 2022. This year, too, most of the kills occurred in unprotected or inadequately protected herds.

>>> Link [Monitoring wolf management GR-12-2023](#)

>>> Link [Monitoring wolf management GR-09-2024](#)

3. First negative effects on the implementation of livestock protection measures

In one of the livestock protection projects we supervised, we realised that the implementation of livestock protection measures had been relaxed due to the massive removal of wolves and was no longer considered equally necessary. In a second project, the use of livestock guarding dogs is no longer considered necessary by the local population for the next alpine season in 2025, as the wolf pack in the region in question may be completely eliminated.

This development already shows that the politically and agriculturally influenced and unselective culling policy is also having the wrong signalling effect. For livestock farmers, as well as the general public, this creates a supposed sense of security and calls into question the need for extensive herd protection measures. The years of development work for successful livestock protection are thus being torpedoed by official bodies and massively weakened in the long term.

4. Without a clear stop-signal, the Swiss shooting policy will continue unchecked and be continuously intensified

Further relaxation of wolf protection planned

Further relaxation of wolf protection is already planned in Parliament. At the beginning of October 2024, the Council of States Committee for the Environment, Spatial Planning and Energy decided to submit a committee motion on wolves. It is calling on the Federal Council to downgrade the protection of wolves under the Bern Convention from 'strictly protected' to 'protected'. In addition, the Federal Council should examine whether the cantons can designate wolf-free zones.

>>> Link [Motion 'Targeted regulation of wolves with less bureaucracy'](#) by the UREK-SR

Amendment of the Hunting Ordinance

Following the evaluation of the comments submitted for consultation, the definitive version of the Hunting Ordinance, with any amendments, will enter into force on 1 February 2025. However, there is little hope that the Hunting Ordinance will be amended in line with the protection of species and wolves, which is a fundamental obligation under the Bern Convention.

With the latest demands in Parliament, an extremely strong and inflammatory agricultural lobby and a Federal Council who decides on matters of nature and species conservation purely on the basis of economic policy, the risk is extremely high that the protection of wolves will be continuously reduced, regardless of all treaties, agreements and public opinion to the contrary.

If the current provisional Hunting Ordinance comes into force unchanged, there will be mass shootings every year from 1 September to 31 January. This massive and unselective decimation of the wolf population will also have a major impact on genetic exchange, affecting not only the Swiss wolf but the entire Alpine wolf population.

CHWOLF is therefore considering submitting a complaint to the Bonn Convention 'Convention on the Conservation of Migratory Species of Wild Animals'.

5. Additional information

Scientific article on Swiss wolf regulation «Wolf regulation: What does science say and what doesn't it say? », published in the information magazine 45/2024 of the organization Fauna VS

Supplement 4: Article «Wolfsregulierung: Was sagt die Wissenschaft und was nicht? » / «Régulation du loup: que dit et qu'ignore la science? », by Raphael Arlettaz, Professor of Conservation Biology at the University of Bern.

6. Supplements:

1. Detailed information on the shooting requests in the Canton of St. Gallen and Graubünden [\[link\]](#)
2. Article «Rösti mischte sich höchstpersönlich ein» (Rösti interfered in person) published in «Der Bund», on 28.09.2024 [\[link\]](#)
3. Detailed information on the shooting requests in the Canton of Valais. [\[link\]](#)
4. Article «Wolfsregulierung: Was sagt die Wissenschaft und was nicht? » / «Régulation du loup: que dit et qu'ignore la science? », by Raphael Arlettaz, Professor of Conservation Biology at the University of Bern [\[link\]](#)

Supplement 2

Rösti mischte sich höchstpersönlich ein

Wolfsjagd in der Schweiz Das Bundesamt für Umwelt blockt Abschussgesuche aus dem Wallis – dann folgt die Intervention des SVP-Umweltministers. Einblick ins Innere der Schweizer Wolfspolitik.

Cyrill Pinto

Am Freitag, dem 13. September, treffen sich in Bern drei einflussreiche Amtsträger, um ein sensibles Thema zu besprechen: Abschüsse von Wolfsrudeln. Anwesend sind Umweltminister Albert Rösti, der Walliser Sicherheitsdirektor Frédéric Favre und Katrin Schneeberger, die Chefin des Bundesamts für Umwelt (Bafu).

Vom Treffen existiert kein Protokoll. Mithilfe von Dokumenten lässt sich aber rekonstruieren, was am Termin besprochen wurde. Es geht vorderhand um einen Konflikt zwischen dem Bafu und dem Kanton Wallis – aber eigentlich steht eine ganz andere Frage im Raum: Wie offensiv soll man in der Schweiz gegen den Wolf vorgehen?

Das Bundesamt verweigert dem Kanton zuerst die Erlaubnis, bestimmte Rudel abzuschiessen. Dann schalten sich Frédéric Favre und Albert Rösti ein, es fliessen zusätzliche Informationen – und das Bundesamt revidiert sogleich seinen Entscheid.

Die Episode zeigt nicht nur, wie sich Umweltminister Albert Rösti höchstpersönlich in Fragen um einzelne Abschüsse einmischt. Sie illustriert auch, wie verpolitisiert der Umgang mit dem Wolf in der Schweiz mittlerweile geworden ist.

Beamte arbeiteten übers Wochenende durch

Die Geschichte beginnt am 21. August, einige Wochen vor der erwähnten Sitzung. An jenem Mittwoch beantragt der Kanton Wallis beim Bafu den Abschuss von vier lokalen Wolfsrudeln. Am 9. September antwortet das Bundesamt: Um ein ganzes Rudel eliminieren zu können, müsse dieses ein unerwünschtes Verhalten gezeigt haben. Etwa wiederholte Angriffe auf Rinder, ein unerwünschtes Verhalten gegenüber Menschen oder systematische Umgehung von Schutzmassnahmen.

Das Fazit des Bundesamts: Ein Rudel wird zum Abschuss freigegeben, zwei Freigaben werden verweigert, und beim vierten Rudel dürfen Jäger erst nach einem weiteren Angriff auf ein Nutztier einschreiten.

Nur vier Tage später findet die erwähnte Sitzung in Bern statt. Klar ist: Albert Rösti muss sich an diesem Freitag offen gezei-



Ein Wolfshund schnappte sich anlässlich der Einreichung einer Petition gegen den Wolfsabschuss im September 2023 eine Maske mit dem Konterfei von Albert Rösti. Foto: Keystone

haben, die Angelegenheit nochmals zu prüfen.

Über das Wochenende arbeiten Beamte im Kanton Wallis durch. Eine neue Dokumentation wird zusammengestellt. Und schon am folgenden Montag schickt Staatsrat Favre ein Wiedererwägungsgesuch an Bafu-Direktorin Schneeberger. Unter Verweis auf das «nette Treffen» mit Bundesrat Rösti heisst es da: «Wir sind der Meinung, dass das

Bafu seinen Entscheid nochmals überdenken muss.»

Frédéric Favre liefert Unterlagen zu weiteren Rissen von Nutztieren, die nach Einreichung des ersten Gesuchs geschahen. «Einziges gerissenes Schaf muss ausreichen, um den Abschuss eines ganzen Rudels zu rechtfertigen», hält er im Gesuch fest, das in Kople an Bundesrat Rösti geht: Der Schutz der Wölfe sei nicht absolut.

Die Antwort aus Bern lässt nicht lange auf sich warten: Noch am selben Montag unterzeichnet Bafu-Direktorin Schneeberger ein neues Schreiben an den Kanton Wallis und autorisiert den Abschuss von zwei weiteren Rudeln. Eines der Rudel habe entgegen der ersten Verfügung doch Schafe in geschützten Situationen angegriffen. Und ein zweites dürfe geschossen werden, weil es nach Einreichung des Ge-

suchs zu mehreren Angriffen auf Nutztiere gekommen sei. Ziel sei ein schnelles Eingreifen.

Ergebnis: Statt eines von vier Rudeln sind nun drei von vier zum Abschuss freigegeben.

Nur drei Tage später fallen die ersten Schüsse. Gemäss der öffentlichen kantonalen Datenbank werden am 19. September ein erwachsener und ein junger Wolf erlegt. Bis Ende Januar dürfen Wildhüter und Jäger mit einer speziellen Bewilligung alle Wölfe der drei Rudel erlegen.

«Stossend, dass es reicht, bei Rösti vorzusprechen»

Die Art und Weise, wie die Wolfsabschüsse autorisiert worden sind, sorgt bei Wolfsfreunden für Kritik. David Gerke ist Schafhalter, Jäger und Geschäftsführer der Gruppe Wolf Schweiz, die sich für den Wolf in der Schweiz einsetzt. Er war in den vergangenen Tagen selbst im Wallis auf der Jagd und kennt die Situation vor Ort.

Gerke sagt, er sei nicht grundsätzlich gegen die Regulierung von Wölfen. Aber die Walliser Methoden verursachten nur neue Probleme: «Rudel werden auseinandergerissen, Jungtiere müssen allein jagen und suchen dort Futter, wo es am einfachsten zu holen ist.» Nutztiere wie Ziegen und Schafe seien deshalb besonders gefährdet. Grundsätzlich sollten Wölfe, die Probleme bereiten, geschossen werden, so Gerke. Aber das ändere nichts an der Notwendigkeit eines guten Herdenschutzes. Und da werde zu oft zu wenig getan.

Zum Treffen zwischen Favre und Rösti sagt er: «Es ist stossend, dass es offenbar reicht, als Kanton bei Albert Rösti vorzusprechen, der dann die gewünschten Abschüsse durchsetzt.» So übergehe man die Fachbehörden. Das entspreche nicht den Anforderungen einer fundierten Prüfung der kantonalen Gesuche durch den Bund.

Das Bundesamt für Umwelt widerspricht. Der Kanton Wallis habe am 15. September Informationen nachgeliefert, die zeigen würden, dass ein Rudel «wiederholt Schäden in geschützten Herden verursacht hat», schreibt eine Sprecherin. Das Bundesamt betrachte das Verhalten des Rudels deshalb als unerwünscht und habe am 16. September der «Entnahme» des gesamten Rudels zugestimmt.



Verein CHWOLF
Nüburg 1
CH-8840 Einsiedeln

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

Berne Convention
Council of Europe
Avenue de l'Europe
F-67075 Strasbourg Cedex

Einsiedeln, den 25. Juli 2024 / cs

Complaint No. 2023/3: Complaint on stand-by: Switzerland: New wolf culling policy

Supplementary information

Dear Sir or Madam,

As requested in your letter of 15 April 2024, you will receive our supplementary information on the further development of the situation regarding Switzerland's wolf culling policy.

1. Regular consultation for the new Hunting Ordinance (JSV)

The new Hunting Ordinance, which was brought into force by the Federal Council on 01.12.2023 without consultation for a limited period until 31.01.2025, has now been subjected to a regular consultation. This consultation lasted from 27 March 2024 to 5 July 2024. CHWOLF submitted a detailed statement to the Federal Office for the Environment within the deadline, in which the Hunting Ordinance was rejected in this form and a detailed position was taken on all points relating to wolves. The main points of criticism are the same as those that led to the complaint to the Berne Convention. (CHWOLF statement enclosed)

Regulation regions and arbitrary thresholds

With the introduction of a threshold value of 12 packs and the division of Switzerland into five regulation regions, the new JSV undermines the provisions of convention, constitutional, and federal law on species protection. In effect, wolves can be hunted for five months of the year and the preventive shooting of entire packs could lead to the local and regional extinction of wolves. This is not compatible with the Federal Constitution (Art. 5 para. 2 and 4, Art. 78 para. 4 and Art. 79), the Federal Act on Hunting and the Protection of Wild Mammals and Birds (Art. 5 and Art. 7 para. 1, 4 and 5), the **Berne Convention (Art. 6, Art. 8 and Art. 9)** or the **Alpine Convention**. With the arbitrary threshold value of 12 packs, Switzerland falls far short of the minimum for a favourable conservation status of at least 20 packs and thus endangers the important genetic exchange in the Alpine region. This may jeopardise the entire Alpine population (Italy, France, Austria, Switzerland) and may lead to the regional extinction of the wolf, which is unconstitutional (Art. 78 para. 4 and Art. 79 of the Federal Constitution) and **incompatible with the Berne Convention Art. 8**.

Clear statement in the new Hunting Ordinance regarding conditions for proactive/preventive pack regulation

➤ **According to JSV Art. 4b para. 2 b1:**

the prevention of damage to farm animals, in livestock holdings that have implemented reasonable herd protection measures in accordance with cantonal agricultural advice.

(Note CHWOLF: This also includes damage to livestock that are killed on pastures declared as 'not reasonably protectable'. These farm animals are completely unprotected, but are considered protected on paper).

➤ **According to the FOEN's explanatory report, Art. 4b on p. 8:**

However, the damage need not - as in the case of reactive population regulation ... - have already occurred; it is sufficient if its occurrence is fairly certain. It is also only necessary to prevent damage and no longer to prevent major damage.

➤ **According to JSV Art. 4b para. 3c:**

If the minimum population in accordance with Annex 3 is exceeded: all wolves in a pack may be killed, provided the population does not fall below the minimum population of the region and damage occurs despite reasonable herd protection measures or the wolves display undesirable behaviour.

➤ **According to the FOEN's explanatory report, p. 1:**

Initial situation: The packs must in particular cause damage or pose a threat to humans. The removal of entire packs is also subject to the condition that the minimum number of wolf packs in a given region is exceeded. (JSV and explanatory report enclosed)

To summarise, this means: As soon as a pack has killed at least one sheep/goat or seriously injured or killed a large animal on a reasonably protected pasture, or on a pasture declared as 'not reasonably protectable', and the threshold value is exceeded in the region concerned, the canton may apply for a shooting licence for the entire pack.

2. CHWOLF statement on the FOEN's statements from the report of 14 February 2024 on the Berne Convention

FOEN statement: *Packs that kill livestock on pastures declared as 'not reasonably protectable' are considered inconspicuous with normal behaviour and cannot be completely eliminated.*

However, the pack can be proactively regulated for learning purposes. This can be done by removing half or two-thirds of the wolf pups born in the year of the cull application.

Objection CHWOLF: The first statement is incorrect. Neither the JSG, the JSV nor the explanatory report explicitly state that the entire pack cannot be released for shooting after kills on a pasture declared as 'not reasonably protectable'.

The second statement is paradoxical. The pack is regarded as 'inconspicuous with normal behaviour' and half or two thirds of the young animals are to be shot for learning purposes. If there is no misbehaviour, no learning effect can be achieved. This justification is absurd! However, a massive reduction of the pack population or the complete elimination, regardless of the justification, naturally achieves a local and purely temporary easing of a possible threat to unprotected livestock. **However, measures with this justification are NOT compatible with the Berne Convention.**

FOEN statement: *It should also be noted that the killing of wolves in Switzerland is used as a last resort, i.e. after other measures have been taken or when the wolves have learnt to circumvent the protective measures. The new wolf management is in line with the Berne Convention.*

Objection CHWOLF: This is an unsubstantiated claim by the FOEN that does not correspond to the actual approach of the Confederation and cantons. The provisions of the law and ordinance are almost always exploited by the cantons to the legal grey area, to the detriment of species protection. The annual preventive shooting of entire packs in order to prevent possible damage (according to the JSV, it only has to be **possible damage** and **not possible major damage**) cannot be described as an exception within the meaning of the Berne Convention Art. 9. The rapid submission and the number of regulation applications by the cantons in the past first regulation period (19) also clearly show that the application of preventive measures serves as a rule and not as an exception.

The term preventive regulation or preventive culling in the event of potential damage implicitly implies that no other or sufficient measures have been taken.

Likewise, the requirement of the Berne Convention exception that there is no other satisfactory solution and that the exception does not harm the population in question is NOT met. Effective deterrence measures are hardly ever implemented due to the excessive expense involved, even though a

disproportionate amount of effort (in terms of personnel and material) is then required to shoot the animals. The enforcement of effective herd protection measures is not consistently pursued everywhere and the quality of controls is often inadequate. And the designation of 'not reasonably protectable' alps or pastures, where grazing by unprotected livestock is nevertheless permitted, represents a fundamental contradiction in herd protection. This also has negative consequences for species conservation, which are deliberately accepted.

(Further information on this in the next section 'Herd protection - facts and shortcomings')

Conclusion: Overall, Switzerland's new wolf management is NOT in line with the Berne Convention.

3. Livestock protection - facts and shortcomings

Culls are massively reduced thanks to herd protection

Federal Councillor Albert Rösti's statement that there are more and more wolves (exponential growth) and more and more bites and that it is therefore imperative to act quickly does not correspond to the actual statistical figures. Thanks to steadily improving herd protection, livestock damage decreased by 40% across Switzerland in 2023. If you look at the development of predation in relation to the number of wolves, you can see that there is massively less damage per wolf today than at the beginning of the reintroduction.

2000 - 4 wolves - 255 kills (63.7 kills / wolf)
2009 - 10 wolves - 382 kills (38.2 kills / wolf)
2018 - 50 wolves - 525 kills (10.5 kills / wolf)
2020 - 120 wolves - 922 kills (7.7 kills / wolf)
2022 - 230 wolves - 1789 kills (7.8 kills / wolf)
2023 - 300 wolves - 1051 kills (3.5 kills / wolf)

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Misjudgements of livestock protection measures and manipulation of damage figures by the authorities

In the past, we have repeatedly found that inspections of livestock protection measures following incidents have been imprecise and rudimentary and have been correspondingly poorly documented. In many cases, the protection measures are considered sufficient, even if they do not comply with the official livestock protection guidelines. Weak points in the fencing, such as openings towards brooks or inadequate electrification, are rarely recognised and criticised. We also know of cases where the number of livestock guarding dogs used was clearly too small according to official guidelines (2 LGDs for 900 sheep), but where the assessment was recorded as 'number of dogs corresponds to herd size'. (e.g. Alp Seewis, GR 2021, kill protocol in the attachment)

The people involved in the inspections usually have a background in agriculture, but are often not specially trained in the serious inspection and assessment of livestock protection measures and the assessment of the use of livestock guarding dogs. The forms available from the FOEN for livestock guarding inspections are beautifully designed, but are very meagre in terms of the information to be recorded for a serious assessment.

The subsequent assessment of the situation by the responsible authorities is also often careless and sometimes incorrect. Many of the farm animals killed are categorised by the authorities as protected, even though the herd protection measures were inadequately implemented or the animals in question were not under any protection at the time of the attack (away from the herd, not in a night pen, not found before nightfall, etc.). All kinds of tricks are also used to arrive at the damage figures required for shooting as quickly as possible (e.g. optimising the shape of the protected area) [Wolf Shooting : Judiciary rejects Graubünden mathematician – infosperber](#)

In many cases, the authorities judged the protective measures to be sufficient, even if they did not comply with the livestock protection guidelines or were not implemented in accordance with the livestock protection concept. In this way, the figures of kills quickly reach the necessary shooting quota.

The reports also state that despite herd protection, there were some kills, so that herd protection had reached its limits and that only the shooting of wolves was effective.

>>> [Link to film Rolf Hösli 'Herd protection in sight - the facts' with Franz. Subtitles](#)

4. Findings from the first proactive regulation period from 1 Dec. 2023 to 31 Jan. 2024

According to the FOEN, at least 58 wolves were shot on the basis of the Hunting Ordinance provisionally put into force by the Federal Council (until 31 January 2025). During the first preventive regulation of the wolf population, the cantons shot a total of 38 wolves. In addition, a good 20 wolves were shot on the basis of reactive orders.

Most of the cantons' 19 applications to shoot wolves were approved by the FOEN

The cantons of Valais, Graubünden, St.Gallen, Vaud and Ticino submitted shooting applications as soon as possible in advance and prepared intensively for the wolf hunt. On 28 November 2023, the FOEN approved most of the cantons' applications. According to the federal government's press release of 28 November 2023 [Régulation préventive des meutes de loups : l'OFEV approuve la plupart des demandes cantonales \(admin.ch\)](#): *The FOEN has examined the applications and approves the requests to remove 12 entire packs. The FOEN cannot approve the application from the canton of Ticino to remove the entire pack in the Valle Onsernone because there have been no kills in protected situations in the last twelve months. However, the FOEN authorises preventive regulation of the pack: the canton of Ticino can shoot two thirds of the young wolves. In the case of five other packs (Val Colla, Carvina, Jatzhorn, Rügiul and Mont Tendre), the cantons of Ticino, Graubünden and Vaud can also do this, as they have requested.*

The FOEN authorised the canton of Ticino to shoot 2/3 of the cubs of the pack in Valle Onsernone, even though this pack had caused **NO damage** to protected herds in the 12 months prior to the application. The pack behaved in a completely species-typical and inconspicuous manner. **This offence violates Article 9 of the Berne Convention.**

Procedure and experience of proactive regulation in the Canton of Valais

The Canton of Valais was authorised to shoot 7 entire packs. Beforehand, hunters were able to register for the wolf hunt to support the gamekeepers. Over 800 hunters registered. They had to complete a 3-hour course in order to be authorised to hunt wolves. When registering, they could also indicate to which pack they would be deployed. As a special incentive, the Valais hunters were allowed to keep the hunting trophy.

The Valais did everything in its power to shoot as many wolves as possible in the two months. To do so, they used all available tools, including those that are prohibited for hunting: Feeding the wolves with dog food, the use of photo traps, thermal imaging cameras and night vision scopes, shooting was also carried out from cars and from mobile huts, which were flown into the forest by helicopter especially for the wolf hunt. Shooting also took place at night in the area of official hiking trails. This is reminiscent of the hunting frenzy of the Middle Ages, where the sole aim was to destroy as many wolves as possible!

['When it comes to wolves, methods that would otherwise be illegal are acceptable': controversial methods of wolf hunting | FM1Today](#)

The use of night-vision sights and shooting from cars are violations of Art. 8 of the Berne Convention. Annex IV prohibits, among other things, sights for shooting at night with an electronic image intensifier or image converter and shooting from moving motor vehicles.

Result Canton Valais: 27 wolves shot and 1 livestock guarding dog shot by mistake, which was near the stable in a fenced pasture. The DNA analyses showed that most of the wolves shot in Valais had never had a negative impact and had never caused any damage. **The justifying statement by the federal government that only dangerous wolves/packs are shot is simply FALSE.**

>>> Link Rissliste Kanton [Wallis Causes de mortalités de loups en Valais \(vs.ch\)](#)

>>> SRF News from 25.4.2024 [Schweiz aktuell from 25.04.2024 - Play SRF](#)

Procedure and experience of proactive regulation in the Canton of Graubünden

The Canton of Graubünden was authorised to shoot 4 entire packs and was also permitted to shoot 'to achieve greater shyness towards humans', 2/3 of the pups of 2 further packs were shot. In total, the canton was authorised to preventively shoot 44 wolves.

As announced by the Graubünden Hunting and Fishing Office in the [annual report 'Large carnivores'](#), a total of 260 livestock were killed by large carnivores in 2023. Of these, only 23 livestock (8.6%) were properly protected. Based on this situation, it is absolutely disproportionate to release 44 strictly protected wolves for shooting. In addition, some of the packs were already reactively regulated after the kills.

In order to achieve greater shyness towards humans, 2/3 of the pups from 2 other packs (Jatzhorn and Rüggiul) were allowed to be shot. However, neither the 2023 annual report nor the various quarterly reports of the canton of Graubünden mention any undesirable behaviour on the part of these two packs. The authorisation to shoot these young animals was therefore simply a **preventive decimation action**. [Publikationen - Merkblätter, Publikationen, Projekte \(gr.ch\)](#)

Procedure and experience of proactive/preventive regulation in the Canton of St. Gallen

The Canton of St. Gallen has been authorised to proactively shoot the entire Calfeisental pack (the only pack in the canton). As the Canton of St. Gallen writes in the media release of 05.02.2024: Great commitment to a better coexistence between alpine farming and wolves. Since the beginning of December, the gamekeepers have spent over 400 hours searching for and shooting wolves. Most of the time, they searched for the wolves at night using thermal imaging equipment. The tenants of the hunting grounds in the shooting perimeter also supported the gamekeepers with reports and missions. During this time, the gamekeepers shot two of the eight wolves from the pack. The Office for Nature, Hunting and Fishing assumes that the wolves killed were the lead male and female wolves. [Wolf control ended for this winter \(SG\) | CHWOLF.org](#)

By shooting both parent animals from the intact pack of wolves, the St. Gallen wildlife authorities have done the most ignorant thing they could have done from a wildlife biology perspective. The inexperienced pups are now travelling alone without parental guidance - a completely counterproductive result!

The implementation of the pack removal only shows that there seems to be a lack of the necessary expertise at all levels. The statement in the canton's media release 'Great effort for a better coexistence between alpine farming and wolves' is a mockery. 400 hours (!) were put in by the gamekeeper to shoot the two parent animals. In the long term, livestock farmers would have benefited far more if the 400 hours of labour or the corresponding money had been used to support herd protection.

The second proactive regulation period will follow from 1 September 2024 to 31 January 2025

During this period, the same regulatory requirements according to the provisionally enacted Hunting Ordinance will apply as in the first regulatory period. **The exhaustion of the maximum decimation of wolves has already started with the application for proactive regulation of the canton Graubünden. >>> See: Addendum to current events**

Any amendments to the Hunting Ordinance, following evaluation of the comments submitted for consultation, will not come into force until 1 February 2025.

5. Reactive regulation - the conditions have been continuously tightened

From 1 June to 31 August, wolf packs or even individual wolves can be shot reactively after damage has been done. Regulation is carried out by shooting a maximum of 2/3 of the pups born in the year of regulation.

Damage threshold: 8 sheep/goats killed (in the case of a pack), 6 sheep/goats killed (in the case of a lone wolf) or 1 large animal killed or seriously injured if the animals were protected by reasonable herd protection measures. This also includes livestock killed on pastures classified as 'not reasonably protectable' (i.e. without herd protection).

Since 2021, partial revisions to the Hunting Protection Ordinance have **gradually and stealthily relaxed** wolf protection. The damage threshold for sheep/goats was lowered from 15 to 10 in 2021 and then to 8 and 6 respectively in 2023. In the case of damage to large livestock, it was lowered from 2

animals killed to 1 animal killed or seriously injured. The number of young wolves that may be shot in the event of pack regulation has also been increased. Since July 2023, if there are several packs, 2/3 of the pups born in the current year may be shot instead of half as previously.

If 8 sheep/goats are killed or only one large animal is injured, it is not proportionate to shoot 2/3 of the young animals. Especially not in the case of damage on pastures categorised as 'not reasonably protectable', where – with the blessings of the authorities - no herd protection needs to be implemented. Moreover, the young animals that are released for shooting are hardly responsible for the damage, as they were still too young to hunt at the time of summer pastures. **This measure simply involves the momentary decimation of the local/regional wolf population with little effect on behaviour.**

Even cumulative reactive and proactive regulation possible under the Hunting Ordinance

Even if a pack has already been reactively regulated, the canton may also apply to the federal government for proactive regulation of the entire pack. According to the explanatory report: *It goes without saying that such a pack can be additionally regulated or even completely removed from 1 September as part of proactive regulation, subject to approval in accordance with Article 4b.*

6. Legal cases

CHWOLF's complaints to the Federal Administrative Court are still pending

In January 2024, CHWOLF lodged complaints with the Federal Administrative Court against the FOEN regarding its approval of the cull applications from the cantons of VS, GR and SG. In an initial preliminary decision dated 26 January 2024, CHWOLF was denied the right to appeal and asked to submit a statement. A comprehensive statement from CHWOLF was then submitted on 25 March 2024. The appeals are still pending before the Federal Administrative Court.

Appeals by WWF, Pro Natura and Birdlife to the Federal Administrative Court rejected

WWF, Pro Natura and BirdLife have lodged appeals with the Federal Administrative Court against the FOEN regarding individual shooting orders.

The Federal Administrative Court rejected these on the grounds that the FOEN had only given its approval, but was not responsible for the shooting orders as such. This was the responsibility of the cantons.

This decision shows that the division of responsibilities for wolf regulation between the Confederation and the cantons leads to a confused and difficult legal basis that makes it difficult or even impossible for nature conservation organisations to lodge objections or complaints.

Despite the division of responsibilities, Switzerland and thus the federal government with its Department of the Environment (DETEC) and the responsible Federal Office for the Environment (FOEN) is ultimately responsible for overall compliance with the Berne Convention and the Alpine Convention throughout Switzerland. Federal legislation and the associated federal ordinances must be developed in such a way that compliance with the species protection requirements of the Berne Convention is absolutely guaranteed, even if competences are delegated to the cantons.

Our complaint no. 2023/3 is therefore of particular importance.

7. Additional information (media releases/articles/publications)

Additional information can be found as a supplement.

8. Supplements:

- I. Addendum to current events, 19 August 2024
- II. Additional information (media releases/articles/publications)
- III. [Hunting Ordinance](#) (French) and [Explanatory report](#) (French)
- IV. CHWOLF opinion consultation (*in German only, may be provided upon request*)
- V. Réponse Strasbourg ALLJ 31 juillet 2024
- VI. Article Tagesanzeiger from 25.04.2024 'Lawyers warn Federal Councillor Albert Rösti against a rush job' (*in German only, may be provided upon request*)
- VII. Article SO from 26.04.2024 'If the sheep are not in the pen, the wolf will strike' (*in German only, may be provided upon request*)
- VIII. Article SO from 24.04.2024 'Canton Graubünden - Council rejects more knowledge about wolves' (*in German only, may be provided upon request*)
- IX. Kill protocol Alp Seewis 2021 (*in German only, may be provided upon request*)

I. Addendum to current events, 19 August 2024

Berne Convention
Verein CHWOLF
Nüburg 1
CH-8840 Einsiedeln

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

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

Einsiedeln, den 9. November 2024 / cs

**Complaint No. 2023/3: Complaint on stand-by: Switzerland: New wolf culling policy
Addendum to current events**

Dear Sir or Madam,

Due to a highly topical event, we would like to add an addendum or supplement to our statement of 25. July 2024.

On 15 August 2024, the canton of Graubünden submitted a collective application to the Federal Office for the Environment (FOEN) for proactive wolf regulation for the coming regulation period (1 September 2024 to 31 January 2025). Unfortunately, we do not have access to the details of the application, only to the publication of the Canton of Graubünden.

The application currently applies to at least 35 of the approximately 120 wolves living in Graubünden (with the current status of pup registration). If further reproductions are recognised, the application can be extended.

We have translated the original German text on the website of the Canton of Graubünden into English.

Communication on www.gr.ch

Canton submits collective application for proactive wolf regulation

15.08.2024

On 1 December 2023, the partially revised Ordinance on Hunting and the Protection of Wild Mammals and Birds (JSV) came into force. Based on this, the canton of Graubünden submitted the application for proactive regulation of the wolf population to the Federal Office for the Environment on 14 August 2024.

The wolf population in the canton of Graubünden increased again this year compared to the previous year, in particular in the previously pack-free areas. Twelve packs are currently confirmed and the Office for Hunting and Fishing (AJF) assumes that more packs will be added over the course of the summer. Detailed information can be found on the website of the Hunting and Fishing Office.

Reduce conflicts, increase shyness

The canton of Graubünden has requested the federal government to allow two thirds of the confirmed pups in all packs with current offspring to be shot. In addition, two applications have also been submitted for the removal of wolf packs where this is permitted by law. These are the Vorab wolf pack and a provisional application to remove the Beverin pack if it is determined that it is still a pack. The aim of these regulation measures is to reduce conflicts in the agricultural sector and increase shyness towards humans without jeopardising the wolf population.

'The aim of these regulation measures is to reduce conflicts in the agricultural sector and increase shyness towards humans without jeopardising the wolf population.'

Adaptive wolf management as a long-term optimisation process

This is the first proactive regulation that will take place during the entire statutory regulation period from 1 September 2024 to 31 January 2025. 'In future, it will be important to closely monitor how the new management approach, which is unique in Central Europe, will affect the wolf population and conflicts,' says Adrian Arquint, Head of the Hunting and Fishing Office. 'Based on the experience gained, this will be continuously optimised over the coming years.'

During the high season hunt and the special hunt, the game warden is supported by the Graubünden hunting community in the removal of entire packs. In order to participate in wolf regulation, hunters must complete a training evening organised by the AJF. The wolf is still not a huntable species under the new Hunting Ordinance. Wolves shot by hunters remain the property of the canton.

First application, others may follow

As the picture of the current wolf population in the canton is still incomplete and the grazing season is still continuing for several months, this is the first application for regulation this year based on the current snapshot. This will be supplemented by further applications depending on the development of conflicts.

Authorisation from the Federal Office for the Environment (FOEN) is expected at the end of August. The AJF will provide information on the FOEN's decision and the regional involvement of Graubünden hunts at that time.

Contact person:

Dr Adrian Arquint, Head of the Hunting and Fishing Office, Tel +41 81 257 38 91 (available from 10.00 to 11.30 a.m.), e-mail Adrian.Arquint@ajf.gr.ch

Responsible: Office for Hunting and Fishing

Conclusion:

It is clear from the canton's intention and justification that the sole purpose of proactive wolf regulation is to reduce the wolf population throughout the canton in order to minimise potential conflicts. The canton is therefore not reacting to problems or damage on a situational or selective basis, which could be considered justified exceptions in the sense of the Berne Convention, **but rather wants to decimate the population generally and on a large scale. In doing so, the entire legally permissible spectrum will be fully utilised immediately and from the outset.**

We see the new hunting ordinance in general, as well as the permanent pushing of the limits of all legal possibilities by the cantons, as a blatant violation of the principles and exemptions of species protection in accordance with the Berne Convention.

Supplements:

- Article in the newspaper „Tages-Anzeiger“ vom 15.08.2024 „Wolfsjagd im Buendnerland_Graubunden will 35 Woelfe schiessen _ Tages-Anzeiger_15-08-2024“ (in German only, may be provided upon request)
- [Link to the publication on the website of the Canton of Graubünden](#)

II. Additional information (media releases/articles/publications)

Lawyers warn Federal Councillor Albert Rösti against rushing into action (Tagesanzeiger, 25.4.2024)

Federal Councillor Albert Rösti and his Department of the Environment were warned several times last year by the Department of Justice that the shooting policy with the new hunting ordinance was not compatible with the Berne Convention. To no avail.

>>> PDF of the article in the supplement (*in German only, may be provided upon request*)

Internal documents show how ruthlessly Rösti proceeded in the fight against the wolf Article at Watson from 05.01.2024

[Albert Rösti and the wolf: How the Federal Council pushed through the culls \(watson.ch\)](#)

IUCN expert group criticises Federal Council for its wolf strategy

The IUCN's (International Union for Conservation of Nature) world-leading Canid Specialist Group has sharply criticised the Federal Council for its latest ordinance to regulate wolf populations. The procedure is unscientific and contradicts the Berne Convention.

Link to the open letter: [Letter to the Swiss Government about Wolf Management, 21-11-2023](#)

Statement by Willy Geiger, President of ProNatura Valais

Geiger was Deputy Director of the Federal Office for the Environment for 13 years, where he was also responsible for wolf management in Switzerland.

‘Until now, only wolves that caused damage could be shot. The idea that entire packs can now simply be wiped out without their animals being responsible for any damage is shocking.’ A clear paradigm shift that is politically motivated, says Geiger. ‘Proactive wolf regulation is based neither on scientific facts nor on knowledge of wolves, but on loud propaganda.’ Geiger finds it incomprehensible how the Federal Council is now undoing years of development work in predator management and herd protection by removing wolf packs. Willy Geiger is convinced that the path Switzerland has now taken in wolf management is the worst possible measure.

Link to article: President of Pro Natura is shocked - ‘Wolf hunting is based on loud propaganda’ 28.11.2023 pomona [President of Pro Natura Valais is shocked - ‘wolf hunting is based on loud propaganda’ \(pomona.ch\)](#)

Canton Graubünden - Council rejects more knowledge about wolves

Are there many wolves because there is a lot of game? How does the wolf help the forest? These and other questions that Cantonal Councillor Simon Gredig wanted to investigate. Parliament, however, rejected the motion. One councillor even said that the motion painted too positive a picture of the wolf. He also emphasised: ‘*We need regulation of wolves, not more papers and reports.*’

>>> Report as pdf in the supplement (*in German only, may be provided upon request*)

Federal Office for the Environment whitewashed biodiversity report under pressure from agriculture

6 May 2024 in 20 Minuten: Pressure from agriculture - Rösti Federal Office doctored biodiversity report

Link to the article: [Bafu manipulated report on biodiversity - 20 Minuten](#)

Grand chamber in favour of wolf-free areas

There are already new demands in the National Council to relax wolf protection with wolf-free zones - SDA report from 17.04.2024. [National Council wants better protection from wolves with 'wolf-free zones' \(parlament.ch\)](#)

After the wolf, the lynx is now being targeted

Article in Blick from 04.05.2024: [After the wolf, the lynx is now being targeted - Blick](#)

V. Réponse Strasbourg ALLJ 31 juillet 2024

**Avenir Loup Lynx Jura
(ALLJ)**



Convention de Berne
Conseil de l'Europe
Avenue de l'Europe
F-67075 Strasbourg Cedex

Arzier-Le-Muids, le 30 juillet 2024

Plainte en attente n° 2023/3 - Suisse : Nouvelle politique d'élimination des loups

Mesdames et Messieurs les membres de la commission permanente ou son bureau,

D'abord, permettez-nous de vous remercier pour la qualité de votre réponse et l'esprit d'ouverture dont vous avez fait preuve en décidant de mettre votre décision en attente.

Par ce courrier, nous répondons à votre sollicitation du 15 avril 2024 afin de vous donner notre réponse en notre qualité de co-plaignants.

Comme vous le savez certainement, la consultation pour une nouvelle ordonnance sur la chasse OChP a été ouverte le 27 mars 2024 (annexes 1 et 2) et nous avons bien évidemment répondu point par point (annexe 3) en spécifiant nos attentes et en proposant des modifications aux points qui ne répondent pas aux critères de la convention de Berne.

Malheureusement, la nouvelle ordonnance révisée n'est pas encore diffusée et nous doutons que la nouvelle version le soit avant le mois de septembre mais plus tard et surtout, nous redoutons que nos remarques et propositions n'y soient pas intégrées.

Un seul exemple pour vous permettre de comprendre nos craintes. Dans l'annexe 1, pour l'ouverture de la consultation 2024, il est fait mention que le législateur voulait la régulation proactive dans la loi votée en décembre 2022. C'est absolument faux, vous lirez à l'annexe 4 (point 7a), que si la loi prévoit bien la régulation du loup, elle n'est absolument pas proactive et surtout que ça ne doit pas mettre en danger les effectifs, etc. L'utilisation d'arguments fallacieux, les attaques et le dénigrement de certaines associations de défense du loup sont malheureusement devenues notre quotidien comme la limitation des droits de recours. Ajoutez que la protection des troupeaux n'est absolument pas une priorité et régresse, la situation du loup devient donc catastrophique dans notre pays.

Dans ces conditions et sans connaître la position de la Confédération (BAFU-OFEV), nous pensons que la procédure doit se poursuivre et que la plainte aille à son terme.

Nous restons bien évidemment à votre disposition pour tout complément d'information et vous adressons Mesdames et Messieurs les membres de la commission permanente ou son bureau, nos respectueuses salutations.

Annexe 1

Révision de l'ordonnance sur la chasse : le Conseil fédéral ouvre la procédure de consultation :
[Révision de l'ordonnance sur la chasse : le Conseil fédéral ouvre la procédure de consultation \(admin.ch\)](#)

Annexe 2

Ordonnance sur la chasse, projet au 27 mars 2024 :
[Dokumentvorlage AS für Word 2021 \(admin.ch\)](#)

Annexe 3

Nos remarques lors de la consultation :
[Avenir Loup Lynx Jura demande une révision urgente de l'ordonnance sur la chasse - Avenir Loup Lynx Jura](#)

Annexe 4

Loi Fédérale du 1^{er} décembre 2023
[RS 922.0 - Loi fédérale du 20 juin 1986 sur la c... | Fedlex \(admin.ch\)](#)