

## Dear President Von der Leyen, dear European Commission,

As Zoogdiervereniging (Dutch Mammal Society), we would like to express our deep concerns about the European Commission's press release of 4 September and about the very unusual way, in which the Commission is collecting information, data and opinions on the problems related to the Grey Wolf (*Canis lupus*). We were particularly outraged by the tight deadline of the consultation, the content of the press release, and especially the news published on social media, which, without any scientific reference, spread misleading information and even prejudged the verdict on the wolf and its conservation status.

This kind of directed communication is not compatible with the European Commission's own 'Better Regulation' rules. The 18-day consultation period is in no way a reasonable one, nor is it realistic if the EC expects a serious and scientifically sound response from stakeholders of the Member States. Furthermore, it is regrettable that years of conservation efforts, considerable amounts of public money spent on implementing EU nature legislation and projects to ensure coexistence with wolves, but also the results of the recent "Fitness Check" of the Nature Directives, are being undermined by misleading communication and biased consultation.

While emphasizing the foregoing preliminary view, we seek to respond to the Commission's consultation and provide the following information about wolves.

### Data on wolves

The population of wolves in the EU is estimated to be approximately 17.000 individuals with a regular increase in the last half-century in most of its range<sup>1</sup>. The recovery of the species is partly due to socio-economic changes, including changes in field and game management and tolerance of wildlife, but to a large part, due to strict legal protection. Experience and evidence gathered by BirdLife ECA Partners on wolf-human interactions are in line with the European scientific consensus, as follows:

- Overall, despite the general increase in the number of wolves in Europe, many of its populations remain threatened by poaching, and its conservation status in Europe is far from being favourable. Despite documented connections, many wolf populations below critical sizes are genetically unstable<sup>2</sup>, and not resilient to external factors, such as human interventions.

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<sup>1</sup> <https://www.rewildingeurope.com/wp-content/uploads/publications/wildlife-comeback-in-europe-2022/index.html>

<sup>2</sup> <http://dx.doi.org/10.1111/mec.12010>

- As an apex predator, fears of localised wolf 'overpopulation' are unrealistic and not scientifically justified. Population sizes are effectively controlled by the availability of food, and by the highly territorial behaviour of the species.<sup>3</sup>
- Hundreds of wolves are killed each year in the EU, using the existing exemptions in the Habitats Directive, but the desired effect of thinning wolf populations cannot be proven, unless it reaches a level of threatening the existence of the population. In fact, culling can have documented opposite effects,<sup>4</sup> actually increasing levels of conflict. Poaching of the species is widespread<sup>5</sup>, and contrary to expectations, the official population controls do not reduce the magnitude of illegal killing<sup>6</sup>.
- While damage to livestock does occur, there is no evidence in Europe from the last century that the wolf is dangerous for humans. Wolves do not treat humans as prey, and fatal encounters are exceptional, and virtually absent from Europe so far, in contrast to several real and significant threats to human life, in relation to e.g., climate change and ecological collapse.
- Livestock depredation may seem substantial in some regions<sup>7</sup>; however, its magnitude must be interpreted in the context of the ecological conditions and socio-economic circumstances (husbandry practices, prevention measures, compensation rules applied) and the size of the national distribution area. When comparing numbers between existing livestock<sup>8</sup> and losses due to the wolf<sup>9</sup>, the figures vary considerably from country to country, but the EU average is less than 0.1% for sheep and goat, and for cattle is barely detectable.
- It is clear from the information available that significant losses are mostly linked to the lack of care: either inadequate supervision of livestock and/or insufficient physical protection. With proper supervision and protection (e.g., herder, shepherd dog, quality electric fence, deterring tools, etc.) the problems can be avoided, or massively reduced.
- There are various tools to help farmers implement preventive measures, protect livestock and compensate for losses. There's also ample flexibility to address problems as they arise. Targeted financial support is available under the CAP (e.g., non-productive investments, compensations), which could help to protect livestock, but these opportunities are not used sufficiently due to government decisions.

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<sup>3</sup> <https://www.lifewolfalps.eu/en/misconceptions/>

<sup>4</sup> <https://doi.org/10.1371/journal.pone.0113505>

<sup>5</sup> <https://www.nature.com/articles/s41598-022-05679-w>

<sup>6</sup> <https://royalsocietypublishing.org/doi/10.1098/rspb.2015.2939>

<sup>7</sup> <https://rm.coe.int/inf45e-2022-wolf-assessment-bern-convention-2791-5979-4182-1-2/1680a7fa47>

<sup>8</sup> Data from EUROSTAT

<sup>9</sup> <https://rm.coe.int/inf45e-2022-wolf-assessment-bern-convention-2791-5979-4182-1-2/1680a7fa47>

Improvement could be undertaken to ensure proper compensation for occasional damage caused by wolves to avoid farmer-wolf conflicts.

- Wolves have a significant impact on ecosystems and provide important ecosystem services from an economic perspective. They naturally control big game populations that has a documented positive effect on e.g., reduction of road accidents caused by these species<sup>10</sup> and forest habitat regeneration<sup>11</sup>. Crop farmers are actually benefiting from the wolf's effect on wild herbivore populations, while pig farmers can also be grateful for the wolf's control of the wild boar population, which has been shown to curb the spread of ASF<sup>12</sup>. The presence of wolves in the ecosystem controls the population of other predators, such as foxes, which has a beneficial effect not only from a conservation point of view but also for small game managers.
- We strongly believe that the problems with wolves are extremely far from the level of concern that some farmers' organisations and, most regrettably, the European Commission's communication has been making them out to be. The coexistence with the species is possible as proved by more than 80 LIFE programme projects over the last 30 years<sup>13</sup>, the problems raised are manageable and do not in any way justify a change in the level of protection of the species.
- In the Netherlands the situation in the field with regard to the number of wolf fencing measures has been studied. The results show that wolf fencing measures are practically non-existent.<sup>14</sup> This has been confirmed by numbers that have been made public by the governmental organization BIJ12 regarding claims in relation to damage caused by wolves. Over a nine-year period 693 claims were related to farmers that did not implement wolf fencing measures. Only 9 claims were made by farmers that did implement wolf fencing measures.<sup>15</sup>
- In the Netherlands there already is a fully functioning contingency plan that covers all actions to be taken in certain problematic situations. This policy has been approved by all stakeholders, including governmental departments.<sup>16</sup>

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<sup>10</sup> <https://doi.org/10.1073/pnas.2023251118>

<sup>11</sup> <https://www.rewildingeurope.com/wp-content/uploads/publications/wildlife-comeback-in-europe-2022/index.html>

<sup>12</sup> <https://www.mdpi.com/1999-4915/13/10/2062/htm>

<sup>13</sup> <https://www.wwf.eu/?11724891/Facts-about-wolves-in-Europe>

<sup>14</sup> See the attached report Wellner & van der Klauw 2022 - 'Het percentage genomen preventieve maatregelen tegen wolvenschade in de Nederlandse wolventerritoria en de achterliggende reden van veehouders om deze wel of niet te implementeren'

<sup>15</sup> Wolvenschade melden en overzicht van de meest recente schademeldingen (bij12.nl)

<sup>16</sup> Interprovinciaal Wolvenplan 24022018 (bij12.nl) and the attached report Bommel et al 2020 - 'Analyse probleemsituaties wolf'

## Our advice

The return of the wolf to Europe is one of the undoubted success stories of European conservation. The recovery of a species with such an ecological range would not have been possible with national legislation alone and is a clear testament to the workings of the Nature Directives. These successes should be celebrated, with a proportionate response to any problems that may arise, rather than a return to the practices of the past.

Finally, The European Commission should reflect on the international implications of its action. The EU has been a driving force behind global efforts to conserve biodiversity and taken leadership position in the BCD and other international fora. The EU has a highly developed economy and oversubsidised agriculture sector. Claims that it cannot co-exist with wildlife will inevitable be seen as deeply hypocritical by poor countries that have large populations of subsistence farmers and are urged to conserve much more problematic fauna such as lions, tigers, elephants, hippos or jaguars.

Considering the above, we would like to ask the European Commission to reconsider this consultation, in line with its own rules and practice.

On behalf of Zoogdiervereniging (Dutch Mammal Society),

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