

# MAMMAL CONSERVATION EUROPE

*Working for a Europe where native mammal populations thrive and their habitats flourish*

14<sup>th</sup> September, 2023.

Dear Ursula van der Leyen, President of the European Commission,  
cc. Nicola Notaro, Head of Directorate General for Environment, European Commission

**Re. 'Wolves in Europe: Commission urges local authorities to make full use of existing derogations and collects data for conservation status review', published 4<sup>th</sup> September 2023**

Mammal Conservation Europe is an NGO representing the interests of Mammal Conservation Organisations across Europe. We are writing to express our concern about the tone and wording of the recent press release, and to ask for further information.

Mammal Conservation Europe is surprised to see the European Commission calling for evidence on "challenges related to the return of wolves" with a consultation period lasting only 18 days. This short timeframe is at odds with the Commission's Better Regulation Guidelines which require that all stakeholders should have a reasonable period in which to make informed and effective contributions.

**We request that the Commission works with stakeholders to determine a more reasonable timeframe for the provision of evidence.**

Member States already supply information to the Commission as part of their obligations under the Habitats Directive. There is a significant risk that an open call for additional information could result in biases in the evidence used for decision-making.

**We ask that the Commission acts on its commitment to evidence-based decision making by ensuring that all additional information it considers has been collected and verified in a scientifically rigorous manner.**

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The wording of the Press Release, which ‘urges local authorities to make full use of existing derogations’, without any reference to the Mitigation Hierarchy and the Habitats Directive’s clear guidance that derogations should be used only as a last resort when other measures have failed, is very disappointing. We also consider that the comments on the potential risk to human safety are inflammatory, and contrary to the scientific evidence which shows that the risks to humans is extremely low.

**We request that the Commission issues a revision to its press statement.**

Following centuries of persecution, wolf populations are currently recovering in many EU countries. As noted by the Large Carnivore Initiative for Europe, this is largely a consequence of social, economic and land-use factors but it has also been supported by legislation to protect the species. The return of wolves is welcomed by many EU citizens, but conflicts between wildlife conservation and the interests of hunters and farmers have arisen in some areas. This is to be anticipated given that many activities and management practices have evolved over recent decades, in the absence of large carnivores in the landscape. As noted in the Commission’s Press Release, such conflicts occur ‘especially where measures to prevent attacks on livestock are not widely implemented’.

**We would like to know how the Commission intends to gather information on the reasons why measures to reduce attacks on livestock are not being implemented — despite the availability of significant EU funding — and how it intends to quantify the scale of this issue. This is a vital precursor to tackling conflict in a proportionate and evidence-based way.**

Monitoring of wolf populations is extremely inconsistent across member states. Even within countries, widely differing estimates of population sizes are produced by groups with different interests, and decisions over which sets of figures to report are often politically influenced. Standardisation of monitoring methodologies, and data transparency, are critical first steps for an effective management plan for wolves.

**We would like to know how the Commission intends to improve the standardisation of monitoring and reporting, and would be pleased to discuss how Mammal Conservation Europe could help to facilitate the development of standardised methodologies.**

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Currently, population monitoring, the application of derogations, and the development of management plans, are conducted at country (or sub-country) level. We support the view of the Large Carnivore Initiative that this approach is highly unsatisfactory given the connectivity of wolf populations across neighbouring countries. To date, there are no formal institutional action plans relating to any of the shared European populations of wolves. This point is particularly relevant in the context of the Commission's Press Release which urges member states to make full use of existing powers of derogation, without reference to impacts on neighbouring countries.

**We request information on how the Commission intends to support cross-border monitoring and the development of management plans at the level of populations rather than country. We would be pleased to support the Commission (and the Large Carnivore Initiative) in these efforts.**

We look forward to hearing from you,



Professor Fiona Mathews

Chair, Mammal Conservation Europe