



Working for a Europe where native mammal populations thrive and their habitats flourish
Position on the European Commission's communication on wolves in Europe

Mammal Conservation Europe is concerned about the Press Release made by the European Commission 'Wolves in Europe: Commission urges local authorities to make full use of existing derogations and collects data for conservation status review', 4th September 2023.

Following centuries of persecution, wolf populations are currently recovering in many EU countries. This is largely a consequence of social, economic and land-use factors, including reforestation and the progressive abandonment of agricultural land, but it has also been supported by legislation to protect the species. 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'.

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 time-frame 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.

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 also very disappointing.

Finally, we consider the comments on the potential risk to human safety as inflammatory, and contrary to the scientific evidence which shows that the risks to humans is extremely low.

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14th September, 2023

Dear WHO??

Re. 'Wolves in Europe: Commission urges local authorities to make full use of existing derogations and collects data for conservation status review', published 4th 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 time-frame 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 time-frame for the provision of evidence.

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 the comments on the potential risk to human safety as 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,

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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 scale of, and reasons for, failure to implementation of measures to reduce attacks on livestock despite the availability of significant EU funding.

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 there is significant scope for political influence on which sets of figures are chosen for reporting. 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.

Currently, population monitoring, the application of derogations, and the development of management plans, is 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.