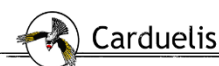






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Addressed to:

EU - 27 Member States

Members of national parliaments

European and international media

Open Letter of 103 NGOs to EU - States

Trust Science, Stand with Wolves, Reject the downlisting.

By rejecting the downlisting of wolves, the 27 - EU States now have the opportunity to preserve the EU Habitats Directive, countering the politically motivated and unsubstantiated process led by EU leadership in the Brussels bubble.

The proposed EU downlisting of wolves is currently under scrutiny by the European Court of Justice. The 27 EU Member States should wait for the European Court's final ruling before making any changes to their national laws. Importantly, downlisting at the national level is not mandatory: EU States have until January 2027 to transpose it into national legislation—and may ultimately choose to reject it altogether.

Summary.

The EU downlisting of wolves—politically driven by the EU leadership within the Brussels bubble—lacks a solid legal and scientific foundation and may be overturned by upcoming judgments from the European Court of Justice.

NGOs are calling on the 27 - EU Member States to act with caution and refrain from amending their national legislation for at least the next 18 months—as permitted under the EU Habitats Directive—in order to avoid potential legal liabilities.

Portugal, the Czech Republic, Belgium, and Poland have already announced that they will maintain strict protection for wolves. Other EU member states are currently considering similar positions. NGOs are urging all 27 EU member states to make full use of the legal grounds provided by EU law to keep their existing national legislation, reject the proposed downlisting, and continue ensuring strict protection for wolves.

Political and economic considerations are not applicable under the EU Habitats Directive and should therefore be deemed irrelevant in the context of the proposed downlisting of the wolf. Nevertheless, it was precisely these considerations that drove the European Commission to propose this selective amendment to the Directive. The Habitats Directive is fundamentally based on ecological criteria therefore socio-economic factors cannot justify the weakening of species protection. For this reason, the 27 EU member states should refrain from following the approach proposed by the European Commission.

Wolves in Europe do not constitute a single, uniform population. Most EU wolf sub-populations remain vulnerable, at risk, or endangered, according to evaluations published by the European

scientific community. A blanket downlisting of all wolf populations across the EU contradicts scientific evidence and, as such, is not compliant with the EU Habitats Directive.

Dear Representatives of the EU-27 Member States,

On 24 June 2025 the downlisting of wolves has been published on the Official Journal of the EU, this means that EU- 27 States have 18 months for translating this change in the national law, however the transposition is not compulsory.

We respectfully urge you to refrain from amending your national legislation concerning the protection status of the wolf (*Canis lupus*), considering that wolf downlisting is a politically motivated move wanted by the EU leadership in Brussels that lacks compliance with EU laws and best available science (a pillar of the EU Treaty).

Legal proceedings are currently pending before the European Court of Justice against both the European Commission and the Council of the EU. These may lead to the reversal of the recent decision to downlist the wolf—an initiative which, as acknowledged by the European scientific community, lacks a robust legal and scientific foundation. As such, it conflicts with the core requirements of the EU Habitats Directive, which remains the cornerstone of nature conservation policy in Europe.

A case filed with the EU Ombudsman against the European Commission regarding the collection of wolf data is also awaiting a response. Furthermore, wolf predation is estimated to affect only 0.07% of the EU's sheep and goat population, the primary target species—and results in minimal and economically insignificant losses. These losses are already largely compensated for through Common Agricultural Policy (CAP) subsidies, funded by EU taxpayers.

Here are the key points for your consideration:

1. Legal Uncertainty:

Given that a few cases before the European Court are underway which question the legality of the EU's wolf downlisting decision, it would be prudent to maintain current national protection. A premature change could later be deemed incompatible with EU law, especially as numerous recent judgments by the European Court of Justice have reinforced an interpretation of the Habitats Directive which clashes with the wolf downlisting decision. A few EU Member States have already announced they will keep strict protection (Belgium, Poland, Czech Republic) and won't change their national laws; others are currently considering it.

2. Scientific and Legal Basis:

The downlisting decision is not substantiated with the available ecological and population data. On the contrary, available evidence clearly indicates that wolf populations in several regions of Europe remain vulnerable, at risk or endangered. Under the EU Habitats Directive, Member States are entitled—and in some cases obliged—to maintain stricter protection standards than those set at the EU level, particularly when science indicates continued conservation needs.

3. Socio-Economic Arguments are Legally Irrelevant:

As recently clarified by the European Court of Justice, socio-economic considerations, including those relating to livestock predation, are not valid grounds for altering conservation

status under the Habitats Directive, which is based on ecology rather than economy. Moreover, such impacts are minimal and are currently mitigated through compensative and preventive measures funded by EU mechanisms such as the Common Agricultural Policy (CAP).

4. **No Immediate Legal Obligation:**

While the downlisting was adopted under the Bern Convention—again largely under a strong pressure from the Brussels - based EU leadership, especially the European Commission—there is no binding legal obligation that compels EU Member States to transpose this decision immediately into both EU and national laws. Additionally, the EU Habitats Directive provides for an 18-month period for adaptation (transposition period), which should allow sufficient time for legal clarity stemming from the European Court of Justice, considering that the lack of science base is already in the public domain. International and EU environmental law regimes (including the Habitats Directive) allow States to keep species strictly protected at national level, therefore irrespective of the dictation of the Bern Convention and the EU decisions.

Conclusions and Requests:

We therefore strongly urge that any national legislative changes be placed on hold until the legal situation is fully clarified and a consensus based on legal and scientific evidence is reached.

Proceeding with caution not only aligns with the precautionary principle embedded in EU environmental law but also protects Member States from potential legal liabilities and national court challenges.

103 NGOs are urging EU Member States to reject the downlisting of wolves in national legislation and to maintain their strict protection status.

Together with our legal and scientific experts we remain at your disposal for any scientific and legal clarification.

Further information:

- [2024 Appeal to the European Court of Justice requesting the annulment of the downgrading of the wolf](#). Details: *Appeal presented by five associations* (Case T-634/24) to the European Court of Justice for the annulment of the Council's decision to downgrade the wolf to the Bern Convention, 2024 Case T-634/24; Action brought on 6 December 2024 - Green Impact and others v. Council and Commission. *The appeal was supported by 17 other associations*, which made an intervention on the appeal. **Appellants:** Green Impact, EARTH, Nagy Tavak, One Voice, LNDK Animal Protection. **Intervener:** LEIDAA, Federazione Nazionale Pro Natura, Io non ho paura del lupo, Animal Cross, Pole Grands Predateurs, ASPAS, Ferus, Asociación Animalista LIBERA!, Suomen eläinoikeusjuristit ry, Svenska Rovdjursföreningen, Naturskyddsföreningen, Pracownia na rzecz Wszystkich Istot, OIPA, LEAL, WWF Italia, Legambiente and ASCEL
- [700 scientists across Europe sign](#) against the downgrading of the wolf
- IUCN-Large Carnivore Initiative (co-ordinated by Dr Luigi Boitani): [Statement](#) against the downlisting of the wolves
- [+2000 Scientists Against the Depletion of EU Nature Directives](#)

- Impact of predation on livestock farming - Sheep predation by wolves in the EU accounts for [only 0.07%](#) of the total number of sheep in the EU (2024).source: Science, 24 January 2024.
- European Court of Justice, Wolf cases (Spain, Austria, Estonia)
 - in its 2024 judgments on the cases (C601/22; C436/22; C-629/23); vs Austria and Spain and Estonia, the European Court of Justice confirmed the need to maintain strict protection in that countries and that the need to ensure a favorable conservation status of the wolf prevails over socio-economic considerations; furthermore, the wolf cannot be designated as a huntable species at regional level when its conservation status at national level is unfavorable; Ecological standards flowing from the Directive's Favorable Conservation Status definition are non-negotiable and may not be adjusted for reasons of social and economic conflicts.
 - Suggested readings on these matters: Legal reviews by Prof. Trouwborst. [\(1\)](#) [Arie Trouwborst | LinkedIn](#)
- EU downlist of the wolf: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32025L1237>
- A formal complaint by Client Earth at the EU Ombudsman on data about downlisting is also pending, link: <https://www.ombudsman.europa.eu/fr/opening-summary/fr/194686>

A few statements from the EU leadership in Brussels failing to acknowledge the conservation status of wolf's populations in the EU and the science- based nature of the EU Habitats Directive.

Date	MEP	Statement	Sources
May 2025	Herbert Dorfmann MEP, EPP Group Spokesman in the Parliament's Agriculture Committee	[Politicians) need to listen to people and try to find answers if people are concerned by a situation, when normal or traditional farming is not possible because there are too many wolves”	https://www.eppgroup.eu/newsroom/epp-group-secures-reform-to-wolves-protection-status
May 2025	Herbert Dorfmann MEP, EPP Group Spokesman in the Parliament's Agriculture Committee	“Farmers can now breathe a sigh of relief. We have listened to their concerns and delivered real change at the European level to address today’s reality and protect rural livelihoods” [...] “The Habitats Directive has been a clear success, helping the wolf population recover from near extinction to over 20,000 individuals across the continent. But now it’s time to adapt to today’s reality. This means balancing our conservation efforts with protecting farmers”	https://www.eppgroup.eu/newsroom/epp-group-secures-reform-to-wolves-protection-status
May 2025	Esther Herranz García, who leads the file on behalf of the EPP Group	“With this revised approach, the responsibility for implementing management plans will rest with the Member States, allowing them to tailor their strategies to the	https://www.eppgroup.eu/newsroom/epp-group-secures-reform-to-wolves-protection-status

	in the Parliament's Environment Committee	specific needs of their regions. This flexibility will facilitate a more adaptive and effective management of wolf populations, leading to better outcomes for both humans and wildlife, and providing farmers with the tools they need to protect their livestock and maintain their livelihoods”	to-wolves-protection-status
September 2024	Herbert Dorfmann MEP, EPP Group Spokesman in the Parliament's Agriculture Committee	“This is a major breakthrough in tackling the sharp increase in wolf populations, which pose a growing threat to pastoral farming, tourism, and rural communities across Europe”	https://www.eppgroup.eu/newsroom/give-us-freedom-to-protect-ourselves-from-wolves
September 2024	Alexander Bernhuber MEP, who was in charge of the topic on behalf of the EPP Group in the Parliament's Environment Committee	“Today’s decision is the start of a long-overdue process to bring wolf populations under control. As these populations grow, their conservation status must evolve too”	https://www.eppgroup.eu/newsroom/give-us-freedom-to-protect-ourselves-from-wolves
September 2024	Alexander Bernhuber MEP, who was in charge of the topic on behalf of the EPP Group in the Parliament's Environment Committee	“The move to downgrade the wolf’s protection under the Bern Convention opens the door for revising their status in the EU Habitats Directive. This will give Member States more freedom to implement effective management plans”	https://www.eppgroup.eu/newsroom/give-us-freedom-to-protect-ourselves-from-wolves
September 2024	Herbert Dorfmann MEP, EPP Group Spokesman in the Parliament's Agriculture Committee	“While some protective measures may still be needed to safeguard livestock, today's decision provides greater legal clarity and empowers rural communities to take the necessary steps to protect themselves”	https://www.eppgroup.eu/newsroom/give-us-freedom-to-protect-ourselves-from-wolves
September 2024	Peter Liese MEP, EPP Group spokesman in the Parliament's	“I am very pleased with this decision. People are worried about the increase in the population of wolves in Europe. They are no longer an endangered species, but they are a particular threat to grazing livestock.	https://www.eppgroup.eu/newsroom/give-us-freedom-to-protect-ourselves-from-wolves

	Environment Committee	Livestock grazing is a near-natural form of agriculture, and it is being pushed back more and more by the wolf. It is therefore good that we are finally seeing the necessary action”	protect-ourselves-from-wolves
May 2025	ECR MEP Pietro Fiocchi	“The proposal simply aligns with accepted best practice internationally, and member states are free to take greater protective measures in favour of wolves if they want”	https://ecrgroup.eu/article/pragmatic_wildlife_management_shouldnt_be_held_hostage_by_emotion_and_exagg
May 2025	ECR MEP Bert-Jan Ruissen	“The proposal puts regions and communities front and centre in wildlife management. It’s the kind of flexibility and pragmatism we want to encourage!	https://ecrgroup.eu/article/pragmatic_wildlife_management_shouldnt_be_held_hostage_by_emotion_and_exagg
September 2024	ECR MEP Pietro Fiocchi	“The European Union has finally given an adequate response to the many livestock farmers who suffer from unjustified wolf predation on a daily basis. Amending the Berne Convention is a necessary legal step to cascade changes in European directives and national legislation. We are on the right track and today’s result rewards our efforts on behalf of livestock farmers”	https://ecrgroup.eu/article/ecr_welcomes_downgrade_of_wolf_protection_status
March 2025	European Commission President, Ursula von der Leyen	"In some European regions, wolf packs have become a real danger especially for livestock. Today, we are proposing a change of EU law that will help local authorities to actively manage wolf populations while protecting both biodiversity and our rural livelihoods”	https://ec.europa.eu/commission/presscorner/detail/en/ip_25_711
December 2023	European Commission President, Ursula von der Leyen	“The comeback of wolves is good news for biodiversity in Europe. But the concentration of wolf packs in some European regions has become a real danger especially for livestock. To manage critical wolf concentrations more actively, local authorities have been asking for more flexibility. The European level should facilitate this and the process the Commission started today is an important	https://ec.europa.eu/commission/presscorner/detail/en/ip_23_6752

		step. I am deeply convinced that we can and will find targeted solutions to protect both biodiversity and our rural livelihoods”	
March 2025	Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy	“Protecting wolves under the Habitats Directive has allowed the species to recover from near-extinction in recent decades. However, we now face a changing reality on the ground with large numbers of wolves in some EU countries. Today’s proposed change in the legal status of the wolf from strictly protected to protected under the Habitats Directive will give Member States the flexibility to manage wolf populations. This does not change the legal obligation on Member State to protect the species and preserve its populations”	https://ec.europa.eu/commission/presscorner/detail/en/ip_25_711
February 2025	Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy	“The Commission consistently promotes a science-based approach in its policy on coexistence with large carnivores”	https://www.eune.ws.it/en/2025/02/19/only-wolf-hunting-allowed-in-europe-eu-wont-review-protection-status-of-other-predators/