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Subject: Your letter of 6 February 2023

Dear Mr Knol,

Thank you very much for your letter of 6 February to Commission President von der Leyen on the subject of the wolf in Friesland and your views on the current EU policy on wolves.

The wolf has formerly been eradicated in large parts of Europe, yet it is a native species that is part of Europe's natural heritage. This is why current European policy and legislation such as the Habitats Directive¹ aims to restore and maintain this species, as well as other species of community interest, at favourable conservation status. However, we are also aware that the ongoing recovery of the wolf is leading to the resurgence of conflicts in the concerned areas, in particular with livestock farmers because of the increased risks of livestock damage in the areas concerned. Addressing the problem of livestock predation and promoting coexistence between large carnivores and pastoralism is an important priority of our policy on large carnivores since the adoption of the Habitats Directive and the establishment of the LIFE programme².

In your letter, you mention that in a very short time wolves killed hundreds of animals in your region. Unfortunately, we have not been able to verify this data with BIJ12³, the authority that supports Dutch provinces in the performance of statutory tasks such as the monitoring of wolves. It is important to recall that wolves (and other large carnivores) mainly prey on wild ungulates (red deer, roe deer, wild boar, chamois), but may also prey on livestock, mostly sheep, when wild ungulates are not available and sheep are not sufficiently protected.

Livestock protection measures have proven effective in preventing or significantly reducing predation risks when properly implemented and tailored to the specific context in which they are applied. Examples of good practices that have been collected are for example available on the Commission's website on large carnivores⁴ or relevant guidance elaborated under the LIFE Eurolargecarnivores project⁵. As regards the costs of predation, it is for Member States to ensure an adequate compensation of damages for the affected farmers. This type of public support for both prevention and compensation aims to help the concerned farmers to face the risk of predation on their livestock, to share the burden and costs of the conservation of large carnivores, making coexistence with protected wildlife easier, in

¹ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora

² [Guidelines for Population Level Management Plans for Large Carnivores - Environment - European Commission \(europa.eu\)](#)

³ [Wolvenschade melden en overzicht van de meest recente schademeldingen \(bij12.nl\)](#)

⁴ [Guidelines for Population Level Management Plans for Large Carnivores - Environment - European Commission \(europa.eu\)](#)

⁵ [EN Livestock protection brochure.pdf - Google Drive](#)

coherence with the integration principles and the objectives of both EU environment and agricultural policy.

The joint letter sent by Commissioner Sinkevičius and Commissioner Wojciechowski to all EU Ministers for Agriculture and Environment in November 2021⁶ provides a comprehensive picture of the possibilities and tools to address the conflicts associated to the conservation of large carnivores and also invites Member States to make the best use of the available national and EU funding sources to support solutions for coexistence. In this context, EU rules allow for co-financing of prevention and damage mitigation measures, for example as part of the CAP or through state aid. However, to our knowledge, the Netherlands have not made use of this financing opportunity under the CAP to date.

Regarding your question on “hunting [of wolves] for population management”, under Article 16 of the Habitats Directive, Member States may derogate from the strict protection regime that applies to the wolf under certain conditions namely in order “*to prevent serious damage, in particular to crops, livestock, forests, fisheries and water and other types of property*”. Member States are responsible to apply such derogations in line with the legal provisions of Habitats Directive. One of the conditions for granting derogations is to prove that there is no satisfactory alternative and the derogation is not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range. In October 2021, the Commission has published a guidance document⁷ on the strict protection of animal species of Community interest, which provides clarifications on the scope and conditions to make use of the derogations under Article 16 of the Habitats Directive. A dedicated annex on the wolf (Annex III) has been added to this guidance, with the specific aim to better explain the interpretation and implementation of the strict protection provisions as well as the possibilities for derogations when dealing with this species. Specific recommendations on how to address coexistence conflicts have also been provided, including on specific problem wolves you mention (also referred to as ‘bold wolves’).

You refer to the Resolution of the European Parliament of 24 November on the protection of livestock farming and large carnivores in Europe. On 7 March, the Commission sent a comprehensive reply to the European Parliament and has confirmed that *inter alia* it will carry out an in-depth analysis on wolf in 2023 based on all available scientific and technical data in order to assess whether further measures would be needed.

You refer to the fact that 4 out of the 12 Environmental ministers that have signed a letter to the Commission, asking to uphold the species’ protection status under the Habitats Directive, are from Member States where the wolf is listed in Annex V of that Directive. Two of these Member States, namely Spain and Slovakia, do however apply a strict legal protection regime to their wolf populations, and all 4 seem to have large wolf populations. In conclusion, there is on the one hand a need to ensure a balanced coexistence between humans and large carnivores and a key priority to achieve such a coexistence is to prevent and mitigate as much as possible the associated conflicts. On the other hand, it is important to adequately support farmers to address the challenge, and to implement appropriate practices to reduce the risks of predation. It is important that all available tools under the current legal and policy framework are exploited. The Commission is ready to further assist Member States facing coexistence conflicts as also pointed out in our reply to the EP resolution mentioned above.

Yours sincerely,

E-signed

Luisa SAMARELLI
Acting Head of Unit

⁶ [Letter from Commissioner Sinkevičius and Commissioner Wojciechowski.pdf \(europa.eu\)](#)

⁷ [Commission notice Guidance document on the strict protection of animal species of Community interest under the Habitats Directive - Publications Office of the EU \(europa.eu\)](#)