OPEN LETTER

Switzerland's December 2023 - January 2024 wolf cull

To Federal Counsellor Albert Rösti and the Standing Committee of the Bern Convention

28th November 2023 - We, the undersigned, are extremely concerned about the upcoming cull which would allow Switzerland to reduce Swiss wolf numbers by up to 70%, as well as by the recent amendment to Switzerland's national legislation that undermines wolf protection and provides a legal framework for cantons to extirpate entire packs down to a set quota on a preventative basis, regardless of whether or not they have caused serious damage to livestock or threatened humans.^{1,2}

These radical, unilateral measures don't just threaten Switzerland's fragile wolf population, they negatively impact the entire Western-Central Alps wolf population. The Convention's preamble specifically mentions the twin threats of species depletion and extinction.³ As an apex predator and keystone species, the wolf contributes to a richer animal and plant life. Preventative measures, such as electric fences and guardian dogs, are effective at reducing livestock predation and should be more widely implemented. There are better ways to coexist with this keystone species than random, large-scale killing and culling.⁴

Background

Native to Switzerland, the Grey wolf (*Canis lupus*) was hunted to extinction in the late 19th century, with the last individual shot in the Ticino in 1872. In the mid 1990s, wolves began to naturally recolonise parts of the country from Italy, with the first and arguably the most famous pack forming in 2012 in the Calanda region of the Canton of Grisons. Wolves have since been documented in 20 cantons, mostly in the Alps, but also in the Jura. The wolf has been protected since 1986 under the Federal Hunting Law.⁵

The Federal Office for the Environment (FOEN) put the number of Swiss wolves at 250 "mature individuals" in 2022. KORA, which monitors large predator populations on behalf of the Confederation, estimates there are currently 8 pairs of wolves and 31 packs, 9 of which are transboundary packs shared with France and Italy. Switzerland provides very suitable wolf habitats and half the country could theoretically sustain 50-100 packs. Swiss wolves form part of the larger Western-Central Alps population whose numbers are also increasing. Indeed, France and Italy's growing populations were the reason given by FOEN for the recent reclassification of the wolf from Endangered (EN) to Vulnerable (VU), despite the fact that a population of 250 should be classified as Endangered, based on the D classification criteria.

Swiss wolves continue to face significant threats from legal and illegal killing, collisions with road vehicles and trains, and their small, fragmented populations. This winter's cull and the recently amended legislation underpinning it would allow Switzerland to reduce the population by up to 70% and pack numbers to 12,¹⁰ threatening not just the species' survival in Switzerland, but also potentially impacting the wider Western-Central Alps population. The cantonal wolf kill quotas would allow packs to be reduced to below the 17 packs, required to ensure a "minimum viable population" for Swiss wolves as part of the larger Alpine population.¹¹

The new legislation divides Switzerland into 5 regions¹² and would allow pack numbers to be reduced to 3 each in the two designated "large regions", namely the "western Alps" which includes the Valais — the most important route taken by transient wolves from France and Italy — and the "southeast" which encompasses the Grisons. The Canton of Valais has already dispatched invitations for hunters to select the pack they wish to target and has announced that it wants to kill 34 wolves and eliminate 7 of its packs.

International Conventions matter

Switzerland ratified the Bern Convention in 1981. The Convention's aim is to "conserve wild flora and fauna and their natural habitats, especially those species and habitats whose conservation requires the co-operation of several States, and to promote such cooperation" giving particular emphasis to "endangered and vulnerable species". The wolf is listed in Annex II as a "strictly protected fauna species" which can only be regulated to "prevent serious damage" to livestock provided that there is "no other satisfactory solution" and that the measures will "not be detrimental to the survival of the population concerned" (Article 9). 14

Switzerland is also a Party to the Alpine Convention, ¹⁵ the first international treaty aiming to protect an entire mountain range through cooperation between eight Alpine nations and the EU, one of whose objectives is to "preserve Alpine fauna and flora, including their habitats". The Convention also recognises that "the Alps constitute an essential habitat and last refuge for many endangered species", and that, as such, countries share a responsibility for maintaining populations, including of large carnivores, by avoiding "black holes" and promoting a network of sub-population connectivity. ¹⁶

A Convention signed in 2006 between France, Italy and Switzerland stipulates that the wolf populations of all three countries must be considered a single and same Alpine population in the context of national legislation and international law,¹⁷ making it all the more important to implement conservation and management measures that are both coordinated and consistent.

As a Contracting Party, Switzerland is bound to uphold the aims and Articles of all these Conventions. Instead it has repeatedly and increasingly sought to weaken the wolf's protection at both the European and national levels, culminating in this winter's cull. By its unilateral actions, Switzerland isn't just threatening the survival of its own already fragile wolf population, it is in effect outsourcing the responsibility of wolf conservation to its neighbours.

Facts matter

Proponents of the cull have painted the wolf as a blood-thirsty predator that wantonly kills livestock and poses a threat to humans ("cattle today, children tomorrow"¹⁸), but KORA hasn't recorded a single "intrusive" or aggressive wolf in Switzerland since the species' natural recolonisation in 1995¹⁹ and the Swiss wolf Management Plan already allows for wolves that develop "problematic" behaviour towards humans to be shot.²⁰

Conflicts do arise from attacks on livestock that target mostly sheep (over 90%), some goats (6-8%), and only rarely cattle, horses and camelids. However most attacks involve herds left unprotected on summer pastures. Large carnivores, mostly wolves, account for just 6% of sheep mortality during summer grazing on Swiss mountain pastures. Disease and accidents are responsible for most livestock deaths.²¹

Switzerland has long and fully exploited the flexibility of Article 9 of the Bern Convention to remove stock-raiding wolves that cause "serious damage", and far more wolves have been legally shot (54 individuals, i.e. 42%) than have died in traffic collisions (38) or been poached (11) in the last 25 years²². There is therefore no need for a downlisting of the wolf's protected status nor a need for the cull.

Science matters

The supposed aim of this winter's cull is to reduce livestock predation and, in the words of the Federal Council, to "make the wolf fearful again"²³. However less wolves don't necessarily mean less damage which, in Switzerland, is subject to numerous variables such as farm structures, livestock protection measures, prey density and traditional husbandry practices.²⁴ Livestock predation can actually increase after a wolf cull,²⁵ possibly due to impacts on demographic, territorial, and social structure of wolf populations. This can in turn lead to higher reproduction rates and possible changes in animal behaviour, including hunting habits thereby risking defeating the cull's supposed purpose. A 2020 study showed that "lethal control and translocation were less effective than other measures" such as ropes hung with coloured flags (visual warning) and guardian dogs, at reducing livestock predation.²⁶

Indeed, preventative measures such as guardian dogs, electric fences and human presence have proved remarkably successful at reducing wolf damage in Switzerland, as testified by OPPAL,²⁷ an organisation which aims to improve cohabitation between human activities and large carnivores. The number of livestock killed by wolves in Switzerland in 2023 decreased by 29% compared to the previous year (850 vs 1,200), despite an increase in wolf numbers.

Regulating the wolf population is unlikely to prevent livestock kills as long as herd protection remains inadequate, and legalising and condoning the killing of protected species has been shown to increase the risk of poaching.²⁹ Moreover, the anti-wolf rhetoric underpinning the cull doesn't just risk undermining support for wolves, it also seriously subverts the role of science in their management.

Public opinion matters

According to a 2019 survey by Pro Natura,³⁰ Switzerland's oldest nature conservation organisation, 79% of Swiss people do not want wolves killed when farmers fail to protect their livestock. Electric/solar fences have shown particular promise. They are expensive, but subsidies are available. The FOEN has set aside CHF 3.7 million for livestock protection measures.³¹ Today, sheep and goat farming in hilly and mountainous regions is threatened by globalisation and is no longer profitable, so it is often only practised as a side-line occupation. Many farmers refuse to use deterrents, and so the predation continues. The wolf is made a scapegoat in a debate that is symbolic of wider societal divisions such as the urban vs rural split or right vs left-wing politics. Switzerland's high socio-economic standard is inversely proportional to its tolerance for wolf-livestock conflicts.

However, in 2020, the Swiss public voted in a national referendum against an amendment to the law which would have made it easier to kill wolves. Two years later, undeterred by the public vote, parliament passed a new version of the 2020 law that had been rejected by the electorate. It provides the latest legal framework to set canton-level wolf quotas to regulate entire packs "proactively" instead of "reactively" as of 1 December 2023.

The recent amendment to the Ordinance (OChP) which legalises the upcoming cull,³² marks the culmination of over 60 motions in parliament and 17 years attempting to weaken the wolf's protection on both the European and national stages. Moreover it came into force on 1st November without a legal and proper consultation process.

The cull is not science-based and has everything to do with political grandstanding and vilification. It risks further polarisation and further inflaming tensions.

Nature matters

We are currently experiencing a mass extinction of species. The wolf plays a vital role in maintaining the balance of ecosystems and its return to Switzerland is a rare success story in a country with some of the highest percentages of threatened species in the OECD.³³

Decades of progress could be undone this winter and beyond.

Signatories

- 1. AAE-Association animal équité, Switzerland
- 2. Aktionsgemeinschaft Schweizer Tierversuchsgegner, Switzerland
- 3. Aletra Communications Sagl, Switzerland
- 4. Animal Rights Switzerland
- 5. Association Middleway, Switzerland
- 6. Avenir Loup Lynx Jura, Switzerland
- 7. Berner Tierschutz, Switzerland
- 8. David Bittner, Switzerland
- 9. Fair Carbon, Switzerland
- 10. Fondation Segré, Switzerland
- 11. Fondation SOS Chats Noiraigue, Switzerland
- 12. GEONOX GmbH, Switzerland
- 13. Gruppe Wolf Schweiz, Switzerland
- 14. Himalayan Wolves Project Switzerland
- 15. IG Pro Mittellandwald, Switzerland
- 16. IG Berner Wald, Switzerland
- 17. IG Wild beim Wild, Switzerland
- 18. Naturfreunde Schweiz. Switzerland
- 19. PETA Schweiz, Switzerland
- 20. ppp-movement, Switzerland
- 21. Pro Natura, Switzerland
- 22. Society for the Protection of Wolves (SPW), Switzerland
- 23. Stream Foundation, Switzerland
- 24. Schweizer Tierschutz STS, Switzerland
- 25. Stiftung für das Tier im Recht (TIR), Switzerland
- 26. Verein CHWOLF, Switzerland
- 27. Waldexkursionen, Switzerland
- 28. Wolfs-Hirten, Switzerland
- 29. Zoologische Gesellschaft Zürich, Switzerland

- 30. Zürcher Tierschutz. Switzerland
- 31. Ecoflix, International
- 32. Foundation Conservation Carpathia, International
- 33. Global Rewilding Alliance, International
- 34. International Conservation & Biodiversity Team (ICBT)
- 35. International Fund for Animal Welfare (IFAW)
- 36. IUCN SSC Canid Specialist Group, International
- 37. Save the Earth international, International
- 38. Eurogroup for Animals, Europe
- 39. European Wilderness Society, Europe
- 40. EuroNatur, Europe
- 41. European Young Rewilders, Europe
- 42. Humane Society International/Europe, European Union
- 43. Terra 1530, Europe
- 44. The European Nature Trust, Europe
- 45. Wild Europe Foundation, Europe
- 46. Amigos do Protocolo de Kyoto, South America
- 47. Naturschutzbund Österreich, Austria
- 48. Biomass Action Group, Australia
- 49. Environment East Gippsland Inc., Victoria, Australia
- 50. First Friends of Dandenong Creek, Australia
- Wilderness Australia
- 52. The Wolf Conservation Association, Belgium
- 53. BALKANI Wildlife Society, Bulgaria
- 54. Mountains and People Association of Bulgarian Mountain Leaders and Mountain Guides, Bulgaria
- 55. Nature Nova Scotia, Canada
- 56. Wilderness Committee, Canada
- 57. Green Squad, Croatia
- 58. Hnutí DUHA Friends of the Earth Czech Republic
- 59. Institute of Vertebrate Biology CAS Brno, Czech Republic
- Aube Nouvelle pour la Femme et le Développement (ANFD), Democratic Republic of Congo
- 61. Groupe Academia RDC, Democratic Republic of Congo
- 62. Danmarks Vilde Natur, Denmark
- 63. Endelave Natur og Miljø, Denmark
- 64. Foreningen Danmarks Vilde Natur, Denmark
- 65. Min egen, Denmark
- 66. Thomas Læssøe, Denmark
- 67. Tina Ljung, Denmark
- 68. Ulvetid, Denmark
- 69. Vild i Vejen, Denmark
- 70. VILD MED VILJE, Denmark
- 71. MTÜ Loomus, Estonia

- 72. Save Estonia's Forests, Estonia
- 73. Luontoliiton susiryhmä / The Wolf Action Group, Finland
- 74. Animal Cross, France
- 75. Association Le Klan du Loup, France
- 76. Association Protection des Animaux Sauvages (ASPAS), France
- 77. ASPA Vosges, France
- 78. AVES France
- 79. Baleine Sous Gravillon, France
- 80. Boules Epiques, France
- 81. Bretagne Vivante, France
- 82. CAP loup, France
- 83. Crow Life, France
- 84. Ecodomaine La Forestrie, France
- 85. Education Ethique Animale, France
- 86. FERUS (Ours-Loup-Lynx Conservation), France
- 87. France Nature Environnement
- 88. FNE AURA, Auvergne-Rhône-Alpes, France
- 89. Focale pour le Sauvage, France
- 90. Fondation Brigitte Bardot, France
- 91. HUMANIMO, France
- 92. Ligue pour la Protection des Oiseaux (LPO), France
- 93. One Voice, France
- 94. PÔLE GRANDS PREDATEURS, France
- 95. SFEPM Société Française pour l'Etude et la Protection des Mammifères, France
- 96. Société Nationale de Protection de la Nature (SNPN), France
- 97. Wildya, France
- 98. Yasmina Haroune, France
- 99. BUND Hessen, Germany
- 100. BUND Naturschutz in Bayern e.V., Germany
- 101. Centre for Econics and Ecosystem Management, Germany
- 102. Deutscher Tierschutzbund e.V., Germany
- 103. Forum Ökologie & Papier, Germany
- 104. Pro Wildlife, Germany
- 105. ROBIN WOOD, Germany
- 106. Wohllebens Waldakademie, Germany
- 107. AbibiNsroma Foundation, Ghana
- 108. Free World Foundation, Ghana
- 109. ARCHELON, Greece
- 110. CALLISTO, Wildlife and Nature Conservation Society, Greece
- 111. Hellenic Ornithological Society/BirdLife Greece
- 112. Hellenic Society for the Protection of Nature (HSPN), Greece
- 113. iSea, Environmental Organisation for the preservation of the aquatic ecosystems,

Greece

114. Mamagea Environmental Organisation, Greece

- 115. Society for the Protection of Biodiversity Thrace
- 116. Association For Promotion Sustainable Development, India
- 117. Koarp, Iraq
- 118. Compassionate Conservation Middle East, Israel
- 119. Eliante, Italy
- 120. Green Impact, Italy
- 121. lo non ho paura del lupo APS, Italy
- 122. The great daughter GREDA, Kenya
- 123. Animal Rights Association B.and T., Latvia
- 124. Inese Lukšo, Latvia
- 125. Jelena MirnajA, Latvia
- 126. Kemeri National Park Fund, Latvia
- 127. Latvijas ainavas / wildlife conservation NGO, Latvia
- 128. Puse Latvijas, Latvia
- 129. Riga Animal Save, Latvia
- 130. Sofi Charity Foundation, Latvia
- 131. Zootēka, Latvia
- 132. Comité Schone Lucht, Netherlands
- 133. Leefmilieu, Netherlands
- 134. Rewilding Academy, Netherlands
- 135. Rewilding Europe, Netherlands
- 136. Scientists 4 Future Wageningen, Netherlands
- 137. Maxbio Glow, Norway
- 138. NOAH for animal rights, Norway
- 139. Community Initiatives for Development in Pakistan-CIDP, Pakistan
- 140. Mission Awareness Foundation, Pakistan
- 141. Teraz Lasy, Poland
- 142. CIÊNCIA NATURA, Portugal
- 143. Plataforma Lobo-ibérico em Portugal
- 144. Agent Green, Romania
- 145. Association 2Celsius, Romania
- 146. CETM Albamont, Romania
- 147. Earth Thrive, Serbia
- 148. Aevis Foundation, Slovakia
- 149. PRALES, Slovakia
- 150. WOLF Forest Protection Movement, Slovakia
- 151. Animal Angels Slovenja, Slovenia
- 152. Dinaricum Society Society for Conservation and Sustainable Development of the Dinarics, Slovenia
- 153. Društvo za zaščito živali Novo mesto, Slovenia
- 154. LAJKA, Society for the Protection of Animals, Slovenia
- 155. Mačje tačke, Slovenia
- 156. Society for the Protection of Animals Ljubjana, Slovenia
- 157. Terra Anima, Society for Deep Ecology, Slovenia

158.	Eden to Addo Corridor Initiative, South Africa
159.	Arbórea, Spain
160.	Grupo Lobo Andalucia, Spain
161.	Colla Ecologista l'Arrel, Spain
162.	Lobo Park, Asociación, Spain
163.	Voluntariado Censo Lobo en la Peninsula Iberica, Spain
164.	BirdLife Sweden
165.	Djurskyddet Sverige (Animal Protection Sweden)
166.	Naturögat, Sweden
167.	Stora Rovdjursgruppen, Sweden
168.	Tanzania Climate Change Initiative, Tanzania
169.	African Conservation Foundation, UK
170.	Conservative Environment Network, UK
171.	Ecoflix, UK
172.	International Otter Survival Fund, UK
173.	Knepp Wildland, UK
174.	i-nature, UK
175.	Tasting Freedom, UK
176.	Westacre Woodland Management , UK
177.	Wildland Research Institute, UK
178.	Wildlife Network for Disease Surveillance, UK
179.	Biofuelwatch, UK/USA
180.	Angel Creek Forest Preserve, USA
181.	Coastal Plain Conservation Group, USA
182.	Earth Action, Inc., USA
183.	Global Justice Ecology Project, USA
184.	In Defense of Animals, USA
185.	The ReWilding Institute, USA
186.	Wild Heritage, USA/France













































































CAP Loup

























(Endelave Natur og Miljø)

































<u>euronatur</u>











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Wildya







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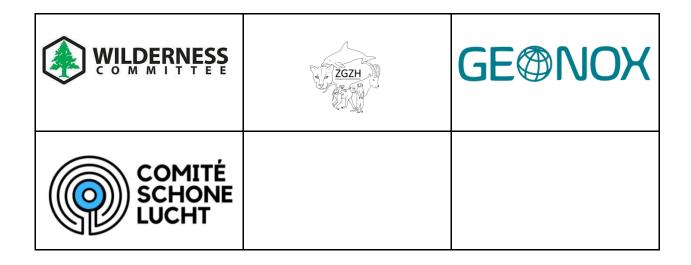






Stream Foundation





<u>References</u>

- 1 Loup : le Conseil fédéral met en vigueur la régulation préventive des meutes, Conseil fédéral
- 2 <u>Ordonnance sur la chasse et la protection des mammifères et oiseaux sauvages</u> (OChP), Fedlex, Confédération suisse
- 3 <u>Convention on the Conservation of European Wildlife and Natural Habitats</u>, Bern 19.IX.1979, Council of Europe, European Treaty Series N. 104
- 4 <u>Commission notice: Guidance document on the strict protection of animal species</u> of <u>Community interest under the Habitats Directive</u>, European Commission, Brussels, 2021, see p.103
- 5 <u>Loi fédérale</u> sur la chasse et la protection des mammifères et oiseaux sauvages (LChP), SR 922.0, Fedlex, Confédération suisse
- 6 Liste rouge des mammifères (hors chauves-souris), 2022, FOEN, No. UV-2202-F, p.37
- 7 KORA, Wolf distribution, Current evidence of packs and pairs in Switzerland
- 8 KORA, <u>FAQs</u>, Does the wolf even have space in densely populated Switzerland?
- 9 <u>Guidelines for Population Level Management Plans for Large Carnivores</u>, Urs Breitenmoser, KORA & Large Carnivore Initiative for Europe on behalf of European Commission, 2008
- 10 Rapport explicatif relatif à la révision de l'ordonnance sur la chasse (OChP, RS 922.01) partie 1 « Régulation de loups et de bouquetins », Confédération suisse, FOEN, 1 November 2023
- 11 <u>25 years of wolf presence in Switzerland: an interim assessment,</u> KORA, December 2020, ISSN 1422-5123, see 3.1 Livestock Predation, see p. 63

- 12 <u>Plan Loup</u>, Aide à l'exécution de l'OFEV relative à la gestion du loup en Suisse. État 2023, FOEN, see Annex 2, p. 21
- 13 <u>Convention on the Conservation of European Wildlife and Natural Habitats</u>, Bern, 19.IX.1979, Council of Europe, European Treaty Series No. 104
- 14 Annex II: strictly protected fauna species, European Environment Agency
- 15 The Alpine Convention, Framework Convention
- 16 <u>Guidelines for Population Level Management Plans for Large Carnivores</u>, Urs Breitenmoser, KORA & Large Carnivore Initiative for Europe on behalf of European Commission, 2008
- 17 <u>Plan Loup</u>, Aide à l'exécution de l'OFEV relative à la gestion du loup en Suisse. État 2023, FOEN, see 1.4, p. 5-6
- 18 Der Wolf hat keinen Platz in der Schweiz, 2010, R. Schmidt, NZZ online
- 19 KORA, Profile Wolf, Encounters and dangers
- 20 <u>Plan Loup</u>, Aide à l'exécution de l'OFEV relative à la gestion du loup en Suisse. État 2023, FOEN
- 21 <u>25 years of wolf presence in Switzerland: an interim assessment, KORA, December 2020, ISSN 1422-5123, see 3.1 Livestock Predation, p.19</u>
- 22 Study reveals extent of Swiss wolf poaching, 14 September 2023, Swissinfo
- 23 La chasse aux loups est ouverte cet hiver en Suisse, Eric Felley, Le Matin online, 1 November 2023
- 24 <u>Does Wolf Management in Latvia Decrease Livestock Depredation? An Analysis of Available Data</u>, J. Suba et al, 2023, Sustainability, 2023, 15(11)
- 25 Effects of Wolf Mortality on Livestock Depredations, R. B. Wielgus & K. A Peebles, PlosOne, 2014
- 26 <u>The effectiveness of livestock protection measures against wolves (Canis lupus) and implications for their co-existence with humans, A. Bruns et al, Global Ecology and Conservation, 2020, Volume 21</u>
- 27 OPPAL, Improvement of the cohabitation between human activities and large carnivores, online
- 28 Switzerland Grapples With the Return of Gray Wolves, C. Elliott, Sierra online
- 29 Wolf Culling May Lead to More Poaching, M. Woo, 2016, Inside Science online
- 30 Mehrheit will Schweizer Wölfe leben lassen, S. Häne, 2019, Tages-Anzeiger online
- 31 <u>Coûts et financement</u>, Protection des troupeaux, Programme National de Protection des Troupeaux, AGRIDEA online
- 32 <u>Ordonnance sur la chasse et la protection des mammifères et oiseaux sauvages</u> (OChP), SR 922.01, Fedlex, Confédération suisse