



Swedish Society For Nature Conservation
WWF Sweden
Swedish Carnivore Association

Janez Potočnik
European Commissioner for the Environment
European Commission
1049 Brussels
Belgium

Stockholm, 24 October 2012

Dear Commissioner Potočnik,

We are writing to you in the matter of an alarming development of the Swedish wolf policy. The Swedish Government is preparing a new licence hunt, eventually aiming to decimate the Swedish wolf population with about 40 per cent, from about 300 to 180. We have reasons to believe that the first decimating hunt will take place as early as this winter.

Thanks entirely to your involvement, Mr Commissioner, the Swedish government in August 2011 abolished the damaging licence hunt and abandoned the national ceiling of 210 wolves in Sweden. This allowed the wolf population to increase to today's number between 260 and 330 wolves in Scandinavia, according to the last census.¹ Our hope was that the Swedish government thereby was convinced about the necessity to comply with Union law.

This hope was turned to ashes last Friday. On the 19th of October, Swedish Environment Minister Lena Ek announced the Swedish Government's intention to keep the nation's wolf population restricted to maximum 180 individuals, only. The statement has been reiterated by the Minister in national radio and several newspapers. The Minister has also discussed the need for a licence hunt the coming winter.

Furthermore, the Swedish Environment Protection Agency (SEPA) has started to prepare for a decimation of the wolf population by assigning consultants to investigate the design of a new licence hunt. One of the tasks assigned is to analyse if the licence hunt can be constructed to achieve a lower population under a period when allegedly measures are carried through to strengthen the population's genetic status, which is strongly questionable from a scientific point of view and not practically plausible at all (see below).

¹ About 30 of these wolves live on the Norwegian side of the border.

Most likely, the Swedish Government will now try to convince you that it now has a solution making it possible to keep the wolf population on an artificially low level without jeopardizing the species' future. It will probably claim that a new management plan will safeguard the road to a favourable conservation status.

We strongly object to the Swedish Government's claims and actions, and want to draw your attention to the fact that all circumstances that you rightly pointed out in your letter to the former Swedish Minister of Environment in December 2010 still prevail.

- A national ceiling of 180 wolves can never be in conformity with the Habitat Directive's rules on favourable conservation status. A decimation of about 40 per cent of the population censused last winter will threaten the fragile population. Even in a hypothetical future with a wolf population in genetically perfect condition, such a limitation would seriously endanger the population, in particular in a long-term perspective, due to higher vulnerability to diseases, poaching, traffic accidents, nativity variation and other random events.
- The statement on 180 wolves is not founded on sound scientific ground and was recently expressly considered as unreasonable by the SEPA in the light of actual difficulties to realize the effective immigration needed. SEPA specifically stated this in its recent addition to the wolf management plan released 19th October.
- The Swedish Environmental Protection Agency itself proposed a minimum of 380 wolves in Sweden, just a few hours before being contradicted by the Environment Minister. SEPA's proposal is based on two absolute prerequisites: First, that 20 genetically unrelated wolves will be incorporated into the population as of 2014 (decided by Swedish Parliament). Secondly, that thereafter at least 3.5 genetically unrelated wolves migrate into the population per every five-year cycle.
- This should be seen in relation to the fact that in the previous three years, since the attempts to achieve genetic reinforcement were required by the Swedish parliament, not one single wolf has been added to the population. The Swedish government still hasn't been able to reinforce the Scandinavian wolf population with new wolves from abroad to improve the poor genetic status.
- The present rate of *effective* immigration is 5 wolves in total since 1983. This corresponds to a rate of 5 wolves in 29 years. The target set by SEPA must therefore be considered highly implausible.
- Furthermore, both SEPA's and Ms Ek's proposals are in stark contrast to the findings of an International Panel of experts on conservation biology employed by the latest Swedish Large Carnivore Inquiry, as well as to the recommendations of leading national scientists on population genetics. According to these scientists, an isolated population, to be long-term viable, must be in the order of several thousand animals, and preferably be shared between several countries. In a science-based scenario, providing other countries (Norway, Finland, Russian Karelia) take their fair area-based share, a figure of 700 wolves was presented for Sweden by the international expert panel referred to above. We will provide a more in depth analysis of these figures, as well as further suggestions for favourable conservation status for Swedish wolves, on November 6th when we meet with the Commission at DG XI.
- No wolf cubs from zoological parks have yet been transferred to wild wolf packs. According to representatives of the Swedish Association of Zoological Parks, Swedish parks today keep two breeding pairs that can produce offspring suitable for release into the wild. If present problems can be solved, it is estimated that genetic reinforcement with wolves from zoological parks – at the best – can be realized by 2016, assuming everything works perfectly according to plans. This will not, however, result in more than a rather insignificant reinforcement.

- The conservation status of the Swedish wolves is still unfavourable. The inbreeding coefficient is still too high, the population number too low and the population is still isolated and severely restricted to exist in only a part of the natural population range (the latter a problem that neither the minister nor the SEPA has dealt with at all).
- The ban on wolves in most of the northern half of the country has not been abolished, which means that most wolves appearing in this area are shot, and any attempts to form pairs and reproduce are effectively stopped.
- The decisions about a national ceiling of 180 wolves and a renewed license hunt on wolves have not been part of the discussions in the numerous consultations held by the government. Despite our participation in the new Swedish Wolf Committee and a number of stakeholder meetings organised by the Swedish authorities, no information whatsoever about a new set ceiling of 180 wolves had reached us before the Friday's statement. On the contrary, the Wolf Committee had a meeting on the 17th of October, when no information at all was given by the government.
- No acceptance for reinforcements of the wolf population among the hunter organizations has been achieved. On the contrary, the hunter organizations have abandoned the agreement with the Swedish Government. One of them has recently even suggested zero tolerance for wolves in nature.
- Any form of wolf hunting (other than protective hunting with reference to Article 16 1.b) must be seen in light of factual circumstances and in relation to that there is no effective and confirmed solution to the genetic isolation problem in place. The idea proposed by Ms Ek to employ a form of hunting with the purpose of cleansing of wolves with high inbreeding coefficients must be considered a high risk experiment, detrimental to the wolf population, in particular in absence of a proven strategy to connect the Swedish wolves with the Finnish wolves on a long term basis.

We urge you, Mr Commissioner, to require the Swedish Government to publicly commit itself to refrain from a new licence hunt on wolves and turn away from the recent declaration of a national limit of 180 wolves. An appropriate occasion for this could be the EU Environment Council meeting on Thursday, 25th of October.

Yours sincerely,

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