



Swedish Society For Nature Conservation
WWF Sweden
Swedish Carnivore Association

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

31th of October 2014

Dear Commissioner Potočnik,

Once again, Sweden prepares for large-scale wolf hunting. After a decision from the Swedish Environmental Protection Agency yesterday we fear that this winter's wolf hunt will be the most extensive ever in modern times.

If the situation weren't so precarious, we would have hesitated to approach you again in this matter, Mr Commissioner, in the very last hours of your service in the Commission. Given your strong personal involvement in protecting the Swedish wolves, we felt that it was your right to be personally informed of recent events.

Yesterday, the Environmental Protection Agency decided to delegate the right to authorise license hunting for wolves to eight county administrations in Sweden. The decision is valid for three hunting seasons. The only limits concerning the numbers laid down in the decision is a minimum level of wolf groups that has to be excluded from hunting in each county. Altogether, the eight counties have to spare 27 wolf groups, equalling 270 individual wolves. In these counties, 36.5 reproducing wolf groups were found during the last monitoring report, equalling circa 360 wolves.

The remarkably small minimum level of wolves to be spared has been derived from the Swedish Government's controversial decision on favourable conservation status. The Government has decided that the wolf population has favourable conservation status at 270 ani-

mals, despite severe problems with inbreeding and isolation in the Scandinavian Peninsula. The decision was based on a population viability analysis, which completely disregarded all genetic aspects and therefore is invalid for determining favourable conservation status for wolves. The Environmental Protection Agency itself made it clear that the analysis was inadequate for these ends in a report to the Government in July 2012.¹

Nevertheless, in an interview yesterday in national radio Maria Ågren, General Director of the Swedish Environmental Protection Agency, said that the decision means that there is “an interval of 90 wolves, in which the county administrations could decide about hunting”.²

Although we find it implausible that the county administrations will use the entire allowance of 90 wolves (approximately 25 per cent of the Swedish wolf population), we find it highly probable that the hunting decisions altogether will strike distinctly higher numbers of wolves than previous license hunts, that have targeted between 16 and 30 wolves.

This time, we will not be able to stop the hunt by appealing to court, since the Hunting Ordinance explicitly says that the counties’ decisions can be appealed to the Environmental Protection Agency, only. Not further. Despite the Commissions Formal Notice (infringement case 2014/2178) about these shortcomings, no changes has been made to remedy this.

The Environmental Protection Agency’s decision yesterday was taken in a distinctly unpredictable legal situation, with several on-going trials in Swedish courts. The decisions to hunt wolves in 2013 and 2014 were temporarily stopped by the courts, after our appeals. The aforementioned infringement cases are still pending. Despite this, the Environmental Protection Agency decided to delegate the authority of wolf hunting during three years to county administrations that in some cases are under extreme local political pressure to decrease the wolf population.

In our opinion, the only responsible way for the Environmental Protection Agency as a competent authority must be to refrain from all decisions that can lead to large-scale hunting until the national legal trials are finished and the infringement cases cleared up.

Finally, a few words on the political situation in Sweden. As you probably are aware of, there has been a shift in government in Sweden this autumn. A coalition of Social Democrats and the Green Party was voted into power. Despite this, the same problematic carnivore policy seems to prevail. This can to a certain extent be explained by the fact that the carnivore policy was laid down in a Parliament decision in December 2013, including strong instructions facilitating a large-scale hunt for wolves controlled by the county administrations. If nothing changes, the Environmental Protection Agency perceives itself bound by this policy.

Since the new Swedish Government’s position in Parliament is weak, there is little or no hope that the Parliament’s position will be changed in the near future. Furthermore, the new Prime Minister Stefan Löfven (Social Democrat) promised a license hunt for wolves in television shortly before the elections.

Despite the situation in Parliament, though, it is in the Government’s power to stop the coming winter’s wolf hunt by taking a decision to temporarily stop the license hunt for wolves.

¹ Naturvårdsverket (2012). Regeringsuppdrag att presentera sårbarhetsanalyser för varg, björn, järv och lo – delredovisning varg. Skrivelse 2012-07-02, Ärenden: NV-05519-12.

² Sveriges Radio, ”Grönt ljus för licensjakt på varg i mellersta Sverige”, 30 October 2014. <http://sverigesradio.se/sida/artikel.aspx?programid=83&artikel=6004963>

This can be done by changing the Hunting Ordinance, without involving Parliament. This method was applied when the previous government faced the Commission's motivated opinion in August 2011 (infringement case 2010/4200).

We thank you, Mr Commissioner, for years of strong support for European wilderness and the rule of law. We hope that the Swedish Government will listen to you again in this matter.

Stockholm 31th October 2013

Yours sincerely,



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