

**Convention on the Conservation of
European Wildlife
and Natural Habitats**



COMPLAINT FORM INSTRUCTIONS:

NB: Submitting a complaint to the Bern Convention is a serious accusation against the concerned Contracting Party(ies). Complaints must demonstrate a sufficient degree of seriousness or urgency related to species or habitats of European importance, and the complainant must demonstrate that the issue has already been raised at local and/or national level.

Complaint forms must be submitted in electronic word format, in English or French, and not exceed 3 pages, including the first administrative page. A maximum 5-page report can be attached. The Secretariat will request additional information on a case-by-case basis. Anonymous complaints are not admissible; however the Secretariat will take measures to keep the personal details of the complainant confidential.

Please, fill in this form and send it to the attention of:

Bern Convention Secretariat

Directorate of Democratic Participation

Council of Europe

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E-mail: Bern.convention@coe.int

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Date:	17 november 2023

1. Please state the reason of your complaint (refer also to the Contracting Party/ies involved and the Articles of the Convention which might be violated)

Planned cull in December 2023 - January 2024 to reduce Swiss wolf numbers by 70%

Contracting Party: **Switzerland** Articles: **1.1; 1.2; 2; 3.1; 6.a; 6.c and 9.1.**

This complaint is submitted on the basis that the wolf (*Canis lupus*) is a species native to Switzerland, listed as Vulnerable (VU) on the country's Red List and as a "strictly protected fauna species" under Annex II of the Bern Convention, and that Swiss wolves form part of the larger Western-Central Alps population. As a Contracting Party, Switzerland is bound to uphold the aims and Articles of the Convention. Instead it has repeatedly and increasingly sought to weaken the wolf's protection at both the European and national levels. National wolf protection legislation has been undermined to such an extent that a legal framework now exists 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. The cantonal wolf kill quotas have been set, not with the aim of promoting and preserving wolf numbers, but at a level which risks the species' extinction since the planned reduction of packs to a minimum of 12 is below the 17 pack figure required to ensure a "minimum viable population". This winter's cull is motivated solely by a politically-led goal to kill wolves (proponents have spoken of a "massacre") allegedly to reduce livestock predation despite the facts that deterrents such as electric fences and guardian dogs are proving effective and that wolf predation was down in 2023, compared to 2022. 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. Switzerland's unilateral decision to implement the cull will also negatively impact the entire Western-Central Alps wolf population which is considered a single population under a 2006 convention signed with France and Italy, making it all the more important to implement conservation and management measures that are both coordinated and consistent. Legalising and condoning the killing of protected species sets a dangerous precedent and research has shown that it also increases the risk of poaching. Finally, we are currently experiencing a mass species extinction. The Convention's preamble specifically mentions the twin threats of species depletion and extinction. The wolf contributes to a richer animal and plant life 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. Decades of progress could be undone this winter.

2. Which are the specific specie/s or habitat/s included in one of the Appendices of the Bern Convention that are potentially affected? (Please include here information about the geographical area and the population of the species concerned, if applicable)

Species affected: [1352](#) - Grey wolf (*Canis lupus*) - [Annex II](#) ("strictly protected fauna species"). Native to Switzerland, wolves were hunted to extinction in the late 19th century, with the last wolf shot in the Ticino in 1872. They have since naturally recolonised parts of the country, with the first wolves arriving from Italy in the mid 1990s. Packs only formed later however, with the canton of Grisons' Calanda pack being the first in 2012. Wolves have since been documented in 20 cantons, mostly in the Alps, but also in the Jura, where the first pack was established in 2019, with two more having formed since. Figures submitted to the [2022 Assessment of the conservation status of the Wolf \(Canis lupus\) in Europe](#) showed the Swiss population numbering a minimum of 153 individuals in 2021. The Federal Office for the Environment's (FOEN) latest [2022 "Liste rouge des mammifères"](#) puts the figure at 250 "mature individuals". [KORA](#), which monitors large predator populations on behalf of the Confederation and with the support of the cantons, estimates that [there are currently](#) 8 pairs of wolves and 31 packs ([defined](#) as a minimum of 3 individuals with at least one female holding a territory together for at least 12 months), 9 of which are transboundary packs shared with France and Italy.

Swiss wolves form part of the wider Western-Central Alps population, one of nine fragmented sub-populations that make up Europe's extant wolf meta-population, and thought to number some [1,900 individuals](#) (indicative total number) shared between Austria, France, Italy and Switzerland. Despite the steady increase in wolf numbers in all Alpine countries, the Western-Central Alps population as a whole is considered as [Red List category: Near Threatened \(NT\)](#) because of its fragmented populations, large dispersion ranges and increasing [wolf-dog hybridisation](#) which threatens its genomic integrity. In Switzerland, the wolf is considered a [medium national priority](#) and listed as [Vulnerable \(VU\)](#), despite its fragmented populations and low numbers. The [Federal Office for the Environment \(FOEN\)](#) justified the wolf's recent reclassification from Endangered (EN) to VU based on the fact that growing wolf populations in neighbouring France and Italy mitigated the risk of its imminent extinction.

3. What might be the negative effects for the specie/s or habitat/s concerned?

Despite the recovery of Swiss wolf populations, the species continues to face significant threats from legal and illegal killing, collisions with vehicles and trains, and fragmented populations. Exterminating 70% of the population and reducing pack numbers from 31 to 12 threatens not just the species' survival in Switzerland, it could have repercussions on the wider Western-Central Alps population. Switzerland's wolves are genetically valuable since the incidence of wolf-dog hybridisation is [insignificant](#) and the cull will increase the risk of inbreeding. It also risks triggering behavioural changes in the remaining wolves making them even more vulnerable both to legal killing and to [poaching](#), which has been shown to increase following the legalised hunting of protected species.

4. Do you know if potentially affected species or habitats also fall under the scope of other international Conventions, (for instance: RAMSAR, CMS, ACCOBAMS, Barcelona Convention, etc) or if the area has been identified as a NATURA 2000/Emerald Network, UNESCO site? Are there pending procedures within another international institution?

[EU Habitats Directive - Annex II & Annex IV](#) - only applicable to EU member states.

[CITES - Appendix II](#) (potentially endangered species).

[Alpine Convention](#), the first international treaty aiming to protect an entire mountain range through cooperation between Austria, France, Germany, Italy, Liechtenstein, Monaco, Slovenia, Switzerland and the EU, one of whose objectives is to "preserve Alpine fauna and flora, including their habitats".

5. Have you attempted to address this issue with the relevant local and national authorities? Please describe. Are there any pending procedures at national level regarding the object of your complaint?

In September this year, Groupe loup Suisse, Pro Natura, WWF and BirdLife all posted complaints against the plan to eradicate wolves across vast swathes of the country. We are not aware of any pending procedures at national level regarding the object of our complaint. However, the current [amendment](#) to the Ordinance ([OChP](#)) which now legalises these shootings, came into force on 1 November without a legal and proper consultation process.

6. Any other information (existence of an Environmental Impact Assessment (EIA), size of projects, maps of the area, etc) (for large files, please add a separate annex document, as mentioned in the above instructions)

Please see accompanying Annex.