

CONSULTATION 2023/24
PARTIAL REVISION OF THE ORDINANCE ON HUNTING AND THE PROTECTION OF
WILD MAMMALS AND BIRDS INITIATED BY THE FEDERAL DEPARTMENT OF THE
ENVIRONMENT, TRANSPORT, ENERGY AND COMMUNICATIONS (DETEC) OF
SWITZERLAND

To the Federal Office for the Environment

We are extremely concerned at the recent project of modification¹ to Switzerland's Federal Hunting Ordinance,² which seriously weakens the protection afforded to the wolf, ibex and beaver and further singles out the brown bear, lynx, otter, golden eagle and golden jackal as "conflict species".

Long persecuted, at times to extinction, these species have started their comeback across both Switzerland and the rest of Europe thanks to changes in public attitude and legislation as well as to cross-border cooperation. Their populations are for the most part still fragile however and the regulatory measures outlined in the project of modification of the Ordinance would, if adopted, undermine decades of critical and dedicated wildlife conservation progress at a time when our biodiversity needs bolstering and protecting. Nature conservation laws in general should be understood and applied against the backdrop of European and global policy goals endorsed by Switzerland to restore³ and give nature more space, halt species extinction and work towards coexistence with wildlife instead of conflict, in compliance with international and European regulation.

Lethal control should be used only as an exception and last resort, in very specific contexts. There are better ways to coexist with these iconic, native and let us not forget—protected—species than shooting and culling.

We are also extremely concerned that this project would, if adopted, allow the shooting of species strictly protected under the Bern Convention—species whose conservation status still needs consolidating. The project would, if adopted, allow the proactive and reactive killing of wolves for eight months each year, thereby endangering their population and risking potentially more, not less, livestock predation, as research clearly indicates is likely to happen due to indirect and collateral effects on wolf pack behaviour and functioning. It would also, if adopted, allow the culling of entire herds of ibex, regardless of whether or not there is the justification of major damage having occurred. It would, if adopted, allow the reactive shooting of beaver. We further question the citing of other protected species whose populations in Switzerland are still fragile.

We therefore:

- stress the absolute need to implement, in addressing the wolf issue, adaptive livestock protocols and measures, drawing on tried and tested methods and urge the State Party to work towards this goal;
- urge the State Party to desist from taking any final decision, prior to reporting to the Permanent Secretary of the Bern Convention, that downgrades wolf, ibex and beaver protection and that would negatively impact their conservation status. This should apply in any part of the Swiss territory where these species are distributed or potentially present or which formed part of these species' historical range, bearing in mind that preserving a "minimum viable population" as requested by the Bureau of the Convention cannot be seen as a satisfactory response to the necessity of preserving these species on a sustainable basis related to scientific assessment of long-term carrying capacity, and that efforts at "preserving" must be assessed at the sub-population level and not at the meta-population level;

¹ [Ordonnance sur la chasse et la protection des mammifères et oiseaux sauvages](#) (OChP) Modification du...

² [Ordonnance sur la chasse et la protection des mammifères et oiseaux sauvages](#) (OChP) du 29 février 1988

³ [On nature restoration and amending Regulation \(EU\) 2022/869](#), Regulation (EU) 2024/... of the European Parliament and of the council of the European Union

- urge the Swiss Government to facilitate an open, unbiased public consultation on the Ordinance and to allow Swiss citizens to participate effectively in its elaboration, based on Articles 3 and 6 of the Aarhus Convention.

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Background and implications

The project of modification of the Ordinance that the Swiss parliament “partially” passed in December 2022 is broad in scope,⁴ but while it singles out a number of protected species, it centres on the “preventative” and “reactive” regulation of wolves. It was “partially implemented” in December 2023 and January 2024 to allow the proactive culling of entire wolf packs which—in addition to existing reactive shooting measures—resulted in the elimination of 45 wolves in just two months. It will be “partially” implemented yet again from 1 September 2024 to 31 January 2025 under the guise of a second wolf cull and, if adopted, the Amended Ordinance will come into full force on 1 February 2025.

Wildlife management should be integral and science-based and strive for genetically diverse, healthy, stable populations, all the more so when protected species are involved. Yet the project of modification singles out protected species whose populations in Switzerland are largely fragmented and which have only just recovered (ibex and beaver), are still fragile (lynx, golden eagle and wolves), or are vanishingly rare (otters and bears). Shooting and culling not only reduce a population’s numbers and weaken its gene pool, they can also lead to changes in behaviour and dispersal propensity, putting the animals at further risk.

1. The implications for wolves

The project of modification of the Ordinance allows wolves (*Canis lupus*)—listed as Vulnerable (VU) on Switzerland’s Red List⁵, as a “protected species” under national law⁶ and as a “strictly protected fauna species” under Appendix II⁷ of the Bern Convention—to be legally shot for eight months of the year, both “preventatively” from 1 September to 31 January each year and “reactively” throughout the summer from 1 June to 31 August. Cantons would also be allowed to shoot lone wolves that “represent a danger to humans”, a deliberately emotive phrase with vanishingly little evidence to support it, and to extirpate entire packs down to a minimum of 12, in contradiction to the minimum viable population of 20 packs originally set by the Federal Office for the Environment (FOEN). The latter figure has itself been described as “speculative”⁸ by the IUCN/SSC Canid Specialist Group, the world’s leading expert body on wolves.

The need to curb the boom in wolf numbers⁹ is repeatedly cited as a justification for the revised legislation. In 2023, 232 live wolves¹⁰ were “detected” in Switzerland and at the time of writing¹¹ the country hosts 35 packs, 11 of which are transboundary with France and Italy, according to KORA, which monitors the populations of large carnivores in Switzerland. Yet despite Switzerland’s wolf population making up just 1.4% of the European wolf population and 16% of the Alpine population (based of wolf populations of 21,500 for Europe and 1,900 for the Alps¹²), the project of modification of the Ordinance allows over two-thirds of the extant wolf packs on Swiss territory to be eliminated.

⁴ [Révision de l’ordonnance sur la chasse : le Conseil fédéral ouvre la procédure de consultation](#), Berne, 27.03.2024

⁵ [Liste rouge des mammifères \(hors chauves-souris\)](#), 2022, FOEN

⁶ [Rapport explicatif relatif à la révision de l’ordonnance sur la chasse](#) (OChP ; RS 922.01) du 1er février 2025

⁷ [Convention on the Conservation of European Wildlife and Natural Habitats](#), Appendix II — Strictly protected fauna species

⁸ [Wolf Management Plans of Switzerland](#), 2023, Letter to FOEN, IUCN/SSC Canid Specialist Group

⁹ [Rapport explicatif relatif à la révision de l’ordonnance sur la chasse \(OChP, RS 922.01\) — partie 1 « Régulation de loups et de bouquetins »](#), du 1 novembre 2023, FOEN

¹⁰ [Long-term evolution of the number of detected individuals and packs](#), KORA

¹¹ [Distribution](#), Wolf packs in Switzerland, as posted on 4 June 2024

¹² [Assessment of the conservation status of the Wolf \(*Canis lupus*\) in Europe](#), 2022, Council of Europe

These are dangerously low population targets, especially given the abundance of suitable habitats in Switzerland which could, from a bio-environmental perspective, in theory sustain 50-100 packs.¹³

The FOEN's argument that, because "over 115 wolf cubs were born in Switzerland in 2023 versus 50 wolves eliminated" the population is "not endangered and will continue to thrive in the coming years and to disperse across the Alps"¹⁴ is simplistic. Wolf cub mortality figures are hard to come by but, according to Peter Dettling¹⁵ who studied Switzerland's first wolf pack, of the 46 cubs born between 2012 and 2018, only about one-fifth survived for the first two years and almost 85% of known deaths were caused by humans. Indeed, the vast majority of the wolves shot both reactively and proactively to date in Switzerland have been juveniles.

The bar has also been greatly lowered with regard to when "problem" wolves can be shot and, in the case of "reactive" regulation, damage to livestock is now considered "important" if a wolf kills six sheep or goats in four months (down from 35 sheep in four months, or 25 sheep in one month under the original "Swiss wolf concept") or if it kills or seriously injures one cow, horse or new world camelid, kept in "protected" conditions. A wolf that kills a single "protected" cow, equid or camelid, therefore dooms the entire pack, with shooting taking place for five months of the year, over several years.

Livestock predation affects mostly sheep in Switzerland, but the official criteria used to determine whether a flock is in fact "protected" or indeed "protectable" are themselves highly questionable. Pastures containing flocks of 60 sheep or over are deemed to be "not reasonably protectable", for example, which clearly has nothing to do with the terrain. The canton of Schwyz has classified 85% of its Alpine pastures as "not reasonably protectable" based on these contentious and obscure criteria and sheep are left to graze deemed "protected on paper" but not in reality. The project of modification of the Ordinance nevertheless allows wolf packs that target such sheep to be eradicated.

While livestock predation is subject to multiple factors including wild prey density and traditional husbandry practices, it correlates most strongly with the non-implementation of protection measures. Unprotected animals can in turn lead to conditioning and "problematic" wolves. Indeed, wolves are generalist-opportunistic predators that adapt their feeding strategies depending on their prey's availability and vulnerability.¹⁶ But while domestic livestock are easy targets, wolves generally prefer¹⁷ to feed on wild prey.¹⁸ This is the case in Switzerland too, where the preliminary results of a study on the prey spectrum of Swiss wolves indicate that wild prey made up 83% of their diet, with sheep accounting for 11.3%, bovids for 3.1% and equines for just 0.2%.¹⁹ It should further be noted that just because a wolf consumed a particular prey, this does not necessarily mean that it killed it.

Switzerland's location at the heart of Europe makes it a vital corridor for species dispersal and genetic exchange across the Alpine arc. As a Party to the Alpine Convention—the first international treaty with the aim of protecting an entire mountain range through cooperation between eight Alpine nations and the EU—Switzerland has joint responsibility for promoting a network of sub-population connectivity.²⁰ In the case

¹³ [Does the wolf even have space in densely populated Switzerland?](#) FAQs, KORA

¹⁴ [Gestion provisoire/future du loup \(Suisse\)](#), 2023, T-PVS/File(2024)30, Bern Convention, Council of Europe

¹⁵ [Peter A. Dettling](#), private communication

¹⁶ [Grey wolf \(Canis lupus\) predation on livestock in relation to prey availability](#), 2020, A. Janeiro-Otero et al.

¹⁷ [Wolves prefer to feed on the wild side](#), 2021, University of Göttingen

¹⁸ [What drives wolf preference towards wild ungulates? Insights from a multi-prey system in the Slovak Carpathians](#), 2022, N.F. Guimarães et al.

¹⁹ [The food spectrum of wolves in Switzerland](#), 2024, KORA

²⁰ [Guidelines for Population Level Management Plans for Large Carnivores](#), 2008, Urs Breitenmoser, KORA & Large Carnivore Initiative for Europe on behalf of the European Commission

of wolves, the Valais is the most important route taken by transient wolves from France and Italy, with 19% of the canton considered ideal wolf habitat at elevations of 900-1,800 m;²¹ yet the canton was given the green light to eliminate 7 of its 12 packs. And more could follow. The new legislation divides Switzerland into five purely arbitrary regions²² and allows wolf packs to be reduced to three each in the two designated “large regions”—namely, the “western Alps” which includes the Valais and the “southeast” which encompasses the Grisons—and to two packs in each of the “smaller regions”, meaning the Jura, northeast Switzerland and central Switzerland. In other words, the cantons of Valais and Bern as well as the pre-Alps of the canton of Vaud which make up the “western Alps” could legally host just three packs between them.

The culling of protected species not only reduces genetic diversity, putting further pressure on the population concerned, it has also been shown to increase the risks of poaching²³ and retaliatory killing. Wolves in Switzerland already face significant threats from deliberate and accidental killing by humans. Of the 187 wolf fatalities recorded since 1998, 59% (111) were from legal shooting, 7% (13) from illegal killing and 24% (44) from traffic collisions.²⁴ Yet 23 packs, five of which are transboundary, are currently subject to authorised reactive and proactive regulations (seven have been given a reprieve pending an appeal), with 12 packs targeted for complete elimination and 16 threatened with the shooting of up to two-thirds of their cubs.²⁵ The fact that five packs are targeted with both elimination and cub regulation is testament to the doggedness with which the authorities are dealing with the country’s “wolf problem”.

Wolves in Switzerland are increasingly being treated not as a protected species but as vermin. This no longer looks like a wolf cull, however irrational, to appease livestock owners. It is beginning to resemble an all-out assault on keystone wildlife species generally.

2. The implications for ibex

The project of modification of the Ordinance also allows for the “proactive regulation” of ibex (*Capra ibex*), protected under both federal law and Appendix III of the Bern Convention.²⁶ Ibex were reintroduced to Switzerland in 1911 and today number some 15,000 individuals.²⁷ Despite being the only ungulate to be protected by federal law, around 1,100 are legally shot each year by hunters²⁸ in the Grisons and Valais. Under the project of modification of the Ordinance however, cantons will be able to apply to the FOEN to cull entire herds (killing at least 50% of females, or more if the population needs to be reduced) in autumn and winter on the basis of wholly unscientific arguments that include the need to prevent “potential” damage to “forests and agriculture”, as well as to prevent damage to other animal species or even to other individuals within the same herd. For this purpose, shooting permits will be made valid for a maximum of four years.

Culling adult females runs the risk that any dependent kid dies or loses its fitness and shooting ibex in late autumn coincides with the rut, potentially disrupting reproduction.²⁹ And while Switzerland currently hosts the largest population of Alpine ibex, the species’ overall geographic range has not increased in recent years

²¹ [A wolf Habitat Suitability Prediction Study in Valais \(Switzerland\)](#), 2001, C. Glenz et al.

²² [Plan Loup](#), Aide à l’exécution de l’OFEV relative à la gestion du loup en Suisse. État 2023, FOEN, see Annex 2, p. 21

²³ [Wolf Culling May Lead to More Poaching](#), M. Woo, 2016, Inside Science online

²⁴ [Known dead wolves in Switzerland since 1998](#), (status: 30.04.2024), KORA

²⁵ [Packs in Switzerland](#), regulations authorised, KORA

²⁶ [Convention on the Conservation of European Wildlife and Natural Habitats](#), Appendix III — Protected fauna species

²⁷ [Mammals of Switzerland](#), Alpine ibex, Federal Hunting Statistics, FOEN

²⁸ [Bouquetin, 2013 à 2022, Chasse, Toute la Suisse](#), Statistiques de chasse, FOEN

²⁹ [European Ungulates and Their Management in the 21st Century](#), 2010, M. Apollonio et al.

and concerns persist about its conservation status.³⁰ Moreover, it should be remembered that ibex were eradicated from Switzerland in the nineteenth century as well as from France, and that it was only thanks to conservation efforts made by Italy that the species survived at all. The resulting population bottleneck however “is among the most dramatic recorded for any successfully restored species”³¹ and a lack of genetic diversity can make a species more vulnerable to disease and parasite loads.

It would also appear that the canton of Valais is considering issuing hunting permits to wealthy foreign hunters once more. This practice, which netted the canton some CHF 650,000 a year and saw foreign hunters pay up to CHF 20,000 per ibex, was stopped in 2021 following a public outcry.³² Quite apart from the legal and moral implications of hunting a protected species for recreation, trophy hunting targets the strongest, fittest (mainly male) individuals, further weakening the genetic integrity of herds.

3. The implications for beaver

The project of modification of the Ordinance also targets beaver (*Castor fiber*)³³, protected under federal law and Appendix III of the Bern Convention. Three different subspecies (*C.f. fiber*; *C.f. galliae* and *C.f. orientoeuropeus*) were reintroduced to Switzerland in the 1950s and a plan³⁴ was drawn up to help manage them. Now numbering some 3,500 individuals, they are no longer considered endangered and the cantons can shoot individual animals if they cause “important damage”, without specifying what this means, or if they “represent a danger to humans”, again a wholly unscientific argument. In the case of beaver families, targeted individuals can be trapped from 16 March to 31 July, before being euthanised, although lactating females are to be protected during this time.

Beaver suffer from low levels of genetic diversity and high levels of inbreeding³⁵ in Switzerland. Their increasing numbers are however leading to inevitable conflicts with humans. But while shooting “problem” beaver is the cheapest solution (under CHF 2,000 per beaver³⁶), it is not a long-term one as vacant territories, lodges and dams are immediately claimed by other individuals. Preventative measures such as protecting tree trunks with wire mesh and water flow control devices that mitigate the flooding of roads, crops and other infrastructure are effective and should be promoted as an alternative to shooting, as indeed should translocation, which would also help improve genetic flow.

Neither is shooting humane. Beaver are monogamous and killing individuals disrupts families. The beaver’s crepuscular habits also make it harder to ensure a clean kill and shooting individuals over water risks bullets ricocheting or being slowed down, thereby increasing the risk of wounding and drowning.

4. The implications for other “conflict species”

Other protected species singled out in the project of modification include the brown bear (*Ursus arctos*),³⁷ lynx (*Lynx lynx*),³⁸ otter (*Lutra lutra*) and golden eagle (*Aquila chrysaetos*). While these species are protected under federal law and cannot be hunted, they can be shot in “exceptional” cases with the consent of the FOEN and without the FOEN’s prior approval in the case of brown bears that “pose a threat to humans”.

³⁰ [Distribution, status, and recent population dynamics of Alpine ibex *Capra ibex* in Europe](#), 2020, A. Brambilla et al.

³¹ [Purging of highly deleterious mutations through severe bottlenecks in Alpine ibex](#), 2020, C. Grossen et al.

³² [Porte entrouverte pour les chasseurs étrangers de bouquetins en Valais](#), 16 juin 2023, RTS

³³ [Le castor](#), FOEN

³⁴ [Plan Castor Suisse, Aide à l’exécution de l’OFEV relative à la gestion du castor en Suisse](#), 2016, FOEN

³⁵ [Genetic monitoring of Eurasian beaver in Switzerland and implications for the species](#), 2016, S. Minnig et al.

³⁶ [Biber entfernen](#), [infofauna](#) online

³⁷ [Ours brun](#), FOEN

³⁸ [Le lynx](#), FOEN

Labelling protected species as “conflict species” risks influencing and shaping public perception, paving the way for a further weakening of the legislation.

This is all the more concerning in view of the fragility of the populations concerned. Otters are listed as Critically Endangered (CR) and their presence has only been detected very occasionally along just five Swiss rivers.³⁹ The golden eagle is considered Near Threatened (NT),⁴⁰ with an estimated 350-360 pairs.⁴¹ Brown bears are only sporadically encountered and are considered Regionally Extinct (RE) due to a lack of reproduction. And although the Alpine population as a whole is threatened due to its small size, this did not prevent the legal shooting under existing legislation of two “problem” bears in 2008 and in 2013. Golden jackals (*Canis aureus*) have only recently and very sporadically been detected in Switzerland, being first recorded on camera traps in 2011.⁴² They are not considered established on Swiss territory and are not mentioned or protected under federal law.

The lynx was successfully reintroduced to Switzerland in 1971 and is listed in Appendix III of the Bern Convention and as Endangered (EN) on the country’s Red List. In 2018 the FOEN estimated the population to number some 300 individuals,⁴³ with around 200 found in the Alps, making Switzerland a stronghold of the Alpine lynx population. The country therefore bears a heavy responsibility for the conservation and protection of this large cat. Yet calls for lynx “regulation” are increasing, with several motions⁴⁴ having been submitted to parliament over the years.

4 reasons the change in legislation should be opposed

1. It infringes Switzerland’s legal commitments both national and international

The project of modification of the Ordinance is not only objectionable from a conservation point of view, in that it targets protected species whose populations are still fragile, it could infringe Switzerland’s national and international commitments and obligations. With regard to the latter, it should be noted that **international law takes precedence in principle over Swiss law with regard to conflict resolution**⁴⁵ and that no legal incompatibilities can be accepted between Swiss and international laws. The general provisions of the Federal Constitution⁴⁶ further stipulate that “**The Confederation and the Cantons shall respect international law**”.

Focusing on the wolf, as the species most at risk from the project of modification of the Ordinance therefore, it could be argued that proactive regulation and reducing a protected species shared with neighbouring countries to below its minimum viable population may contravene a number of international conventions and treaties. These include the Bern Convention,⁴⁷ the Bonn Convention,⁴⁸ the Alpine

³⁹ [Situation en Suisse, Prolutra](#)

⁴⁰ [Liste rouge des oiseaux nicheurs](#), Espèces menacées en Suisse, 2021, FOEN

⁴¹ [Aigle royal, Vogelwarte](#)

⁴² [Profile Golden Jackal](#), KORA

⁴³ [Le lynx — le plus grand chat sauvage d’Europe](#), 2018, FOEN

⁴⁴ [Modifications de loi sur la chasse](#) (MCF 17.052), 2018, Année politique suisse

⁴⁵ [Guide de législation, Guide pour l’élaboration de la législation fédérale](#), 4ème Edition, 2019, [Federal Department of Justice and Police](#) (FDJP)

⁴⁶ [Federal Constitution of the Swiss Confederation](#), of 18 April 1999

⁴⁷ [Convention on the Conservation of European Wildlife and Natural Habitats](#), Bern 19.IX.1979, Council of Europe

⁴⁸ [Convention on the Conservation of Migratory Species of Wild Animals](#), CMS

Convention,⁴⁹ the ~~Italo-franco-suisse~~ collaborative protocol⁵⁰ and the Convention on Biological Diversity,⁵¹ most notably its Global Biodiversity Framework (GBF)⁵² 2030 targets 4, 14, 15 and 21.

Switzerland could also arguably be held liable under the Aarhus Convention⁵³ for denying Swiss citizens the right to participate effectively in the elaboration of the decision-making process to modify the current Swiss legal context. Moreover, wolves are deemed a species of conservation concern not just in the Bern Convention but also in CITES⁵⁴ and the Habitats Directive,⁵⁵ with the IUCN Red List⁵⁶ system used to assess their state of conservation, including at country level.

a. The Bern Convention

The 1979 Bern Convention on the Conservation of European Wildlife and Natural Habitats was signed in the Swiss capital and ratified by Switzerland in 1981.⁵⁷ As a Party to this Convention, Switzerland is obliged, *inter alia*, to prohibit any killing of wolves and to allow exceptions to this prohibition only when all of the three conditions stipulated in Article 9 of the Convention, are met, namely: when the killing of one or more wolves 1. “serves one of the purposes enumerated in Article 9—including ‘**to prevent serious damage to livestock**,’ in ‘**the interest of public safety**,’ and ‘**other overriding public interests**,’ and 2. ‘**there is no other satisfactory solution**’ to achieve the purpose in question, and 3. the killing “will not be detrimental to the survival of the population concerned.” In addition, Switzerland must ensure **a reasonable wolf population level**, protect wolf habitat, and outlaw particular means of killing (Art. 2-4, 6, 8, 9 and 11).

Switzerland’s overarching wolf policy outlined in the project of modification of the Ordinance does not appear to meet these criteria.

The term “**serious**” arguably does not apply to livestock damage in Switzerland. From 2020 to 2023, wolf predation averaged around 1,200 sheep per year (around 20% of the total mortality) and this figure drops to just 12 (0.2%) for larger livestock such as cattle.⁵⁸ To put these figures into context, some 4,000 to 6,000 sheep die each year as a result of falling rocks, disease, lightning strikes and other hazards. The same threats kill and maim cows and the Swiss Air-Rescue Rega has for years been airlifting an average of 1,100 injured or dead cows from Swiss mountain pastures each year and all without the influence of the wolf.⁵⁹ Moreover, the vast majority of attacks have thus far taken place on inadequately protected or unprotected flocks (accounting for 80% of attacks in the canton of Valais in 2023) and, as we have already outlined, the official criteria used to determine whether a flock is in fact “protected” or indeed “protectable” are themselves highly questionable.

⁴⁹ [Wolf in the Alps: Recommendations for an internationally coordinated management](#), 2016, ISSN 1422-5123

⁵⁰ [Protocole de collaboration italo-franco-suisse pour la gestion du loup dans les Alpes](#), 2006

⁵¹ [The Convention of Biological Diversity](#)

⁵² [Convention on Biological Diversity, 2030 Targets](#), the Kunming-Montreal Global Biodiversity Framework

⁵³ [The Aarhus Convention](#), European Commission

⁵⁴ [CITES](#)

⁵⁵ [The Habitats Directive](#), EU measures to conserve Europe’s wild flora and fauna, European Commission

⁵⁶ [IUCN Red List of Threatened Species](#)

⁵⁷ [Chart of signatures and ratifications of Treaty 104](#), Council of Europe

⁵⁸ [Wolfs-Hirten](#), personal communication

⁵⁹ [Le Manifeste du Loup](#), 2022, Peter A. Dettling

More damningly still, DNA analysis of the 27 wolves⁶⁰ culled in the Valais last winter have revealed that not a single one of them had killed even one sheep.⁶¹

As for the danger posed to humans and **public safety**, wolves are among “the least dangerous species for their size and predatory potential”.⁶² The most comprehensive report to date investigating wolf attacks on humans found just 26 fatal wolf attacks throughout the world from 2002 to 2020, 14 of which were due to rabies and concluded that: “the risks associated with a wolf attack are above zero, but far too low to calculate”.⁶³ Not a single fatal wolf attack on a human has been recorded in Europe in the last 40 years⁶⁴ and “there have been no known cases of intrusive or aggressive wolves”⁶⁵ in Switzerland since their natural recolonisation of the country in 1995. Humans do not form part of a wolf’s normal prey and a healthy, wild wolf tends to avoid encounters with people. Factors that may increase the risk of an attack include rabies, habituation and provocation. Incidents of young wolves following hikers at a distance or a dog walker venturing too near a den triggering what was described as an aggressive response, have been documented in Switzerland but these are natural reactions that certainly do not warrant culling. It is also necessary to distinguish between the fear that a wolf may engender and the actual danger that it represents to humans. Wolves that develop problematic behaviour with the potential to endanger humans, can anyway be shot in line with the Swiss Wolf Management Plan.⁶⁶ Meanwhile, wolf cubs that pose no threat to either livestock or humans are regularly shot, often before they have reached six months of age.

Contrary to official claims,⁶⁷ non-lethal methods such as herd protection have been working and provide an alternative and “**satisfactory solution**” via which to mitigate livestock predation. Although 2022 was a higher outlier (the reasons for which are unclear) with regard to livestock predation, the years 2020, 2021 and 2023 were remarkably consistent, with 922, 951 and 991 livestock kills respectively.⁶⁸ In other words, livestock predation was stabilising despite the presence of more wolves. Indeed, the ratio of livestock killed per wolf in Switzerland had been steadily declining, from 42:1 in 2000 to 4:1 in 2023.⁶⁹ Guardian dogs, electric fences and human presence have all proved remarkably successful at reducing damage caused by wolves in Switzerland, as testified by the work carried out by OPPAL,⁷⁰ an organisation which aims to improve cohabitation between human activities and large carnivores. And although expensive, preventative measures are subsidised. The FOEN has set aside CHF 3.7 million for livestock protection measures,⁷¹ with additional compensation for livestock predation amounting to around CHF 300,000 annually. It is important that such financial aid continue, not least because 79% of Swiss people do not want wolves killed if farmers do not protect their livestock, according to a 2019 survey.⁷²

⁶⁰ [Known dead wolves in Switzerland since 1998](#), (status: 30.04.2024), KORA

⁶¹ [Les loups abattus cet hiver en Valais n’avaient tué aucun mouton](#), 2024, Blick

⁶² [The situation of the wolf \(Canis lupus\) in the European union](#), An In-depth Analysis, 2023, European Commission

⁶³ [Wolf attacks on humans: an update for 2002-2020](#), 2021, NINA Report

⁶⁴ [The situation of the wolf \(Canis lupus\) in the European union](#), An In-depth Analysis, 2023, European Commission

⁶⁵ [Encounters and danger](#), Profile Wolf, KORA

⁶⁶ [Plan Loup](#), Aide à l’exécution de l’OFEV relative à la gestion du loup en Suisse. État 2023, FOEN

⁶⁷ [Rapport explicatif relatif à la révision de l’ordonnance sur la chasse \(OChP, RS 922.01\) — partie 1 « Régulation de loups et de bouquetins »](#), du 1 novembre 2023, FOEN

⁶⁸ [Depredation](#), Wolf, KORA

⁶⁹ [Gestion du loup: moins de précipitation et une meilleure protection des troupeaux](#), 2024, WWF

⁷⁰ [OPPAL](#), Improvement of the cohabitation between human activities and large carnivores, online

⁷¹ [Coûts et financement](#), Protection des troupeaux, Programme National de Protection des Troupeaux, [AGRIDEA](#)

⁷² [Mehrheit will Schweizer Wölfe leben lassen](#), 2019, Tages-Anzeiger online

In a sudden and unintelligible reversal of policy however, the government announced in January that it was terminating the FOEN's livestock guardian dog program and withdrawing federal funding.⁷³

Reducing packs down to 12 would be **detrimental to the survival of the species** simply because this figure is well below the minimum genetically viable population of 20 packs, itself a questionable figure. Creating a population "black hole"⁷⁴ is incompatible with Switzerland's legal obligations, both domestic and international, to maintain a healthy, viable wolf population.

Indeed, Article 2 of the Bern Convention requires Parties to ensure, *inter alia*, that population levels correspond to ecological requirements, namely: "The Contracting Parties shall take requisite measures to maintain the population of wild flora and fauna at, or adapt it to, a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements and the needs of subspecies, varieties or forms at risk locally". Although this provision does not specify a precise figure, it can be assumed, in the case of the wolf, to be well above the minimum viable number of packs needed to ensure the survival of the species. Moreover, this is formulated not just as an obligation, but in a manner indicating that conservation interests trump economic and recreational interests in the case of conflict.

Wolves in Switzerland form part of the Western-Central Alps population, itself listed as Vulnerable (VU),⁷⁵ and almost a third of the country's 35 extant packs are transboundary with Italy and France, both of whose wolf populations are considerably larger than that of Switzerland. Indeed, this was the reason given by the FOEN for declassifying the wolf from Endangered (EN) to VU on Switzerland's Red List despite the fact that the country hosted 250 wolves at the time, which should have seen the population classified as EN.⁷⁶

The guidelines for two or more countries sharing a population of large carnivores clearly mandate that "All segments of a population should have stable or positive trends, and not just the population as a whole".⁷⁷ A legal report commissioned by the Bern Convention's Standing Committee underlines that "national responsibilities are underpinned by general obligations for international cooperation under the Convention and customary international law. They cannot be delegated because a species or habitat is thriving beyond national boundaries (where the Party concerned has no legal or management powers). For wolves, this means that even if the portion of a population found across an international boundary is secure, this does not justify a derogation if the population on national territory is not viable or where other satisfactory solutions can be found. This approach is supported by all Convention policy documents addressing wolves, which combine recommendations for sub-regional cooperation with individual country-specific actions adapted to national circumstances".⁷⁸ Moreover, the 2006 ~~Italo-franco-suisse~~ collaborative protocol 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,⁷⁹ making it all the more important to implement conservation and management measures that are both coordinated and consistent as opposed to arbitrary and unilateral.

⁷³ [La Confédération met fin au programme d'élevage des chiens de troupeaux](#), 2024, 20 Minutes

⁷⁴ [Guidelines for Population Level Management Plans for Large Carnivores](#), 2008, Urs Breitenmoser, KORA & Large Carnivore Initiative for Europe on behalf of the European Commission

⁷⁵ [The situation of the wolf \(Canis lupus\) in the European union](#), An In-depth Analysis, 2023, European Commission

⁷⁶ [Guidelines for Population Level Management Plans for Large Carnivores](#), 2008, Urs Breitenmoser, KORA & Large Carnivore Initiative for Europe on behalf of the European Commission

⁷⁷ [Guidelines for Population Level Management Plans for Large Carnivores](#), 2008, Urs Breitenmoser, KORA & Large Carnivore Initiative for Europe on behalf of the European Commission

⁷⁸ [Legal Report on the possible need to amend Appendix II of the Convention for the wolf](#), 2005, Council of Europe

⁷⁹ [Plan Loup](#), Aide à l'exécution de l'OFEV relative à la gestion du loup en Suisse. État 2023, FOEN, see 1.4, p. 5-6

If all countries interpreted the Bern Convention as Switzerland does, what would prevent them from reducing their wolf pack numbers down to some “purely arithmetic” and arbitrary double or even single digit figure?

b. The Vienna Convention on the Law of Treaties

Generally speaking, the Bern Convention’s “object and purpose” is to favour wildlife conservation. To interpret it any differently would seem to violate the 1969 Vienna Convention on the Law of Treaties (VCLT),⁸⁰ which Switzerland signed in 1990. This Convention’s principle rule is that a treaty “shall be interpreted in good faith in accordance with the ordinary meaning to be given to the terms of the treaty in their context and in the light of its object and purpose” (supra note 19, at art. 31(1)). The United Nations International Law Commission has further clarified⁸¹ this rule, stating that “When a treaty is open to two interpretations one of which does and the other does not enable the treaty to have appropriate effects, good faith and the objects and purposes of the treaty demand that the former interpretation should be adopted”. Parties must, at the very least, avoid any interpretation that “[l]eads to a result which is manifestly absurd or unreasonable” (25 Id. art. 32(b)).

It is both “manifestly absurd” and “unreasonable” to claim that culling wolves before they have caused any damage, down to levels that threaten their survival does not violate the international treaties drawn up to protect them. Equally absurd are the admissions and contradictions made by the FOEN in its rebuttal to CHWolf’s 2023 complaint⁸² under the Bern Convention, namely that the 2023-24 cull was implemented “because livestock attacks kept increasing” despite the simultaneous admission that there had been a “drop in livestock predation in 2023”; that the elimination of wolves in Switzerland is “a measure of last resort”, when up to two thirds of cubs are regularly shot to “educate” packs; and that the Federal Council’s “purely arithmetic” threshold of 12 packs trumps the 20-pack minimum “scientific recommendation” as long as the wolf population is preserved and maintained, but that “a scientific follow-up would obviously be welcome”.⁸³ The FOEN also continues to claim, again absurdly, that the wolf “remains a protected species”⁸⁴ in Switzerland.

Outsourcing the protection and management of wolf populations to other countries is a further example of the “manifestly absurd” interpretation proscribed by the VCLT. As indeed is shooting protected ibex to “prevent damage to mountain forests” or eliminating beaver that “represent a danger to humans”. Ibex live largely above the tree-line and red and roe deer, whose populations are much larger, are predominantly responsible for the over-browsing of forests. Wild beaver are not considered dangerous to humans: attacks are vanishingly rare even in countries with substantial populations and usually involve individuals infected with rabies. Meanwhile, wolves and other large predators that would both help reduce wild ungulate pressure on forests and “keep game stocks healthy” through the predation of weak and sick individuals are being targeted in Switzerland. Is this too not “manifestly absurd”?

c. The Global Biodiversity Framework (GBF)

The GBF’s 2030 targets 4 and 21, respectively, mandate State Parties to “effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence” and to “ensure that the best available data, information and knowledge are accessible to decision makers, practitioners and the public to guide effective and equitable governance, integrated and participatory management of biodiversity, and to strengthen communication, awareness-raising, education, monitoring, research and knowledge management”.

⁸⁰ [Vienna Convention on the Law of Treaties](#), 1969, United Nations Treaty Collection

⁸¹ [Yearbook of the International Law Commission](#), Vol. II, 1966, United Nations

⁸² [New wolf culling policy \(Switzerland\)](#), 2023/3, T-PVS/Files(2023)62, Bern Convention, Council of Europe

⁸³ [Gestion provisoire/future du loup \(Suisse\)](#), 2023, T-PVS/File(2024)30, Bern Convention, Council of Europe

⁸⁴ [Loup : le Conseil fédéral met en vigueur la régulation préventive des meutes](#), Berne, 01.11.2023, FOEN

Yet politicians and political parties repeatedly spread falsehoods about the wolf (see Section 3, page 16), including that the species was “reintroduced”⁸⁵ to Switzerland. They also greatly exaggerate the danger that wolves represent to humans, with sensationalistic warnings of the “cattle today, children tomorrow” ilk.⁸⁶ Not only are officials doing very little to counter these narratives of fear, some are actually exploiting them and perpetuating the myth of the bloodthirsty wolf. Indeed, the majority Swiss People’s Party regularly demonises the wolf and even launched an online video game⁸⁷ ahead of the recent cull featuring wolves with bloodshot eyes threatening bleating sheep, and screaming hikers and school children, urging players to get their “hands dirty” to “protect children, farmers and livestock from wolf attacks—at least virtually”, “while we wait for wolf regulation to become a reality”.

Coexistence, education and knowledge are not being prioritised. The debate surrounding the wolf is not science-based and has everything to do with political grandstanding and vilification, risking more polarisation and further inflaming tensions. Disinformation is not just disingenuous, it is dangerous. The anti-wolf rhetoric has grown so polarised and so toxic that even those who once spoke up for wolves now fear doing so.

d. National legislation

All protected species in Switzerland are governed and protected by the Federal Hunting Act of 1986,⁸⁸ with the Federal Hunting Ordinance of 1988 providing additional regulatory exceptions. Wolves, lynxes, bears and beaver are further protected and managed through individual national management plans.

Although the wolf has been protected in Switzerland since 1986, its return and re-establishment in the 1990s prompted Switzerland to repeatedly petition the Bureau of the Bern Convention to delist the wolf from Appendix II, “strictly protected fauna species”, to Appendix III, “protected fauna species—regulation is possible” in order to make it easier to kill wolves. When these tactics failed, the government chose to amend and weaken its own laws and policies and to give the cantons more say in wolf management, culminating in the current project of modification of the Ordinance. In 2020, meanwhile, the Swiss public voted in a national referendum⁸⁹ against an attempted amendment to the law that would have made it easier to kill wolves, beaver and a number of other species. Two years later and undeterred by this public vote, parliament passed the project of modification of the Ordinance anyway.

Articles 5.2 and 79 of the Federal Constitution clearly stipulate, respectively, that “State activities must be conducted in the public interest and be proportionate to the ends sought” and that “The Confederation shall lay down principles [...] on the preservation of the diversity of fish species, wild mammals and birds”.⁹⁰

Finally, is the Consultation itself actually legal? Allegations have surfaced⁹¹ that the revision to the Ordinance was enacted without a proper consultation process, thus potentially violating the country’s Consultation Law.⁹² Indeed, the decision was taken by lawmakers without public participation to “partially” implement the project of modification of the Ordinance to allow last winter’s wolf cull. The current Consultation is therefore being held **after** the fact and after 45 wolves⁹³ were shot “preventatively” and

⁸⁵ [Stopper maintenant le loup : l’UDC somme le Conseil d’Etat d’agir!](#) 2024 press release, Swiss People’s Party

⁸⁶ [Der Wolf hat keinen Platz in der Schweiz](#), 2010, R. Schmidt, NZZ online

⁸⁷ [Grâce à l’UDC, le loup est régulé - en ligne comme dans la réalité](#), 2023 press release, Swiss People’s Party

⁸⁸ [Loi fédérale sur la chasse et la protection des mammifères et oiseaux sauvages](#) (LChP); du 20 juin 1986

⁸⁹ [Votation sur la révision de la loi sur la chasse](#), du 27 septembre 2020

⁹⁰ [Federal Constitution of the Swiss Confederation](#), of 18 April 1999

⁹¹ [Änderungen der Jagdverordnung: Stellungnahme SP Schweiz](#), 5 September 2023

⁹² [Loi fédérale sur la procédure de consultation](#) (LCo), du 18 mars 2005

⁹³ [Known dead wolves in Switzerland since 1998](#), (status: 30.04.2024), KORA

“reactively” from December 2023 to January 2024. Furthermore, the government’s 27 March 2024 press release announcing the launch of the Consultation only mentions the 38 wolves shot “preventatively” and states that “the effects of the regulation will only be assessed during the upcoming summer pasturing of flocks. But one thing is sure: the regulation of wolf populations will become a permanent fixture”.⁹⁴ These statements could represent sufficient grounds for a judge to dismiss the Consultation as biased. Indeed, the latter statement begs the question as to why a Consultation is being held at all.

2. The presence of wolves and the other targeted species is beneficial

We are currently witnessing a sixth mass extinction event, this one driven by human activity. The loss of biodiversity affects us all. Greater complexity leads to greater resilience and healthier ecosystems, both vital in our warming world. Indeed, the twin crises of biodiversity loss and climate change are interrelated and interdependent. The benefits accrued from the natural world and its wildlife are incalculable but greatly undervalued and underreported, yet the ecosystem services that they provide don’t just enrich our economies, they enrich our cultures and lives.

The successful re-establishment of wolves and other protected species in Switzerland should be celebrated. These species, all native to Switzerland, were eradicated through persecution or overhunting. It is their decades-long absence that constitutes an anomaly, not their return and re-establishment. These success stories were made possible thanks to a better understanding of nature’s benefits and a growing awareness of the dangers that biodiversity loss poses to current and future generations. To this must also be added our growing appreciation of the intelligence, consciousness and emotional lives of animals. This is especially true of wolves which exhibit remarkable social intelligence.⁹⁵

Now is not the time to waver in our resolve to protect these species and other wildlife. The Bern Convention’s preamble⁹⁶ specifically mentions the twin threats of species depletion and extinction. Switzerland has some of the highest percentages of threatened species in the OECD,⁹⁷ with “a third of all species and half of all types of habitat”⁹⁸ under threat. A recent report by the Federal Council has put the cost of inaction in mitigating climate change and the resulting loss of ecosystem services at between CHF 10 billion and CHF 38 billion per year by 2050.⁹⁹

a. Ecosystem services

The loss of any species can have an impact on food chains and webs, but the decline of apex predators has led to ecosystem disruption across the planet including ecological domino effects triggered by changes at the end of food chains known as trophic cascades. While wolves in Europe cannot engender the trophic cascades described in America’s Yellowstone National Park and the ecological effects of large carnivores in general are attenuated by human actions,¹⁰⁰ they play essential roles nonetheless. Apex predators play vital stabilising and sanitary roles by targeting weak and sick individuals and by preventing prey populations from reproducing beyond the carrying capacity of their environments. Contrary to human hunters, they maintain this selection pressure all year round.

⁹⁴ [Révision de l’ordonnance sur la chasse : le Conseil fédéral ouvre la procédure de consultation](#), Berne, 27.03.2024

⁹⁵ [Wolf social intelligence](#), 2012, J. M. Packard

⁹⁶ [Convention on the Conservation of European Wildlife and Natural Habitats](#), Bern 19.IX.1979, Council of Europe

⁹⁷ [OECD Environmental Performance Reviews: Switzerland 2017](#), OECD

⁹⁸ [Biodiversity: in brief](#), FOEN

⁹⁹ [Environment Switzerland 2022](#), Report of the Federal Council

¹⁰⁰ [Keep the wolf from the door: How to conserve wolves in Europe’s human-dominated landscapes?](#) 2019, D.P.J. Juijper et al.

By keeping deer on the move as well as reducing numbers, wolves also prevent damage to tree regeneration, enabling healthier more resilient forests with more species present. The result is often fewer open areas with lower temperatures, higher humidity and lesser wind currents, all more conducive to stable carbon storage and supportive of climate change mitigation, as well as fire alleviation. With most major conservation strategies, including the 2030 EU Biodiversity Strategy,¹⁰¹ now placing a key focus on strict protection and the protection of large natural habitat areas, the wolf has an important role to play. It should also be noted that large natural habitats can increasingly secure funding for landholders through private sector carbon markets as well as official grants.

Wolves, lynxes and bears also reduce golden jackal and other midsize carnivores' densities¹⁰² and provide carrion for scavengers.¹⁰³ By limiting population booms of wild ungulates and wild boar, they help reduce damage to agriculture and forestry. Wild boar cause some EUR 80 million of damage to agricultural crops in Europe annually¹⁰⁴ and selective over-browsing by red and roe deer as well as by chamois is a growing problem that is leading to a loss of forest diversity¹⁰⁵ across Switzerland. In France, deer predation by wolves has been shown to lead to annual reductions in the costs incurred due to ungulate-vehicle collisions of between EUR 4,500 and EUR 14,700 per wolf.¹⁰⁶

Disease control is another key ecosystem service greatly under-appreciated by society but set to become more important in coming years. Predators help slow the spread of zoonoses by removing sick game and scavenging infected carcasses. Wolves are particularly adept at reducing the transmission and prevalence of infections in multi-host systems of tuberculosis,¹⁰⁷ classical swine fever (CSF),¹⁰⁸ African swine fever (ASF)¹⁰⁹ and chronic wasting disease (CWD).¹¹⁰ CSF and ASF are transboundary viral diseases that infect pigs and cause substantial global socioeconomic consequences and losses.¹¹¹ CWD, which is slowly spreading through cervid populations in America and Scandinavia, is a fatal, incurable, highly contagious neurological disorder caused by prions, that leaves infected animals so lethargic and emaciated it has been dubbed "zombie deer disease". There is a very real fear that this fatal "mad cow"-type disease could one day jump to humans. Wolves have so far maintained immunity to the disease and their cursorial method of hunting allows them to identify and target weak and sick prey far better than any human hunter can. The vital role of predators in controlling diseases needs to be recognised when considering human-carnivore conflicts and the conservation of carnivore populations. We cull wolves at our peril.

Further ecosystem services are provided by the beaver. With eight million years of experience in hydrology, the beaver is one of Earth's best ecosystem engineers.¹¹² Their dams act like speed bumps, slowing the rate of water flow and thereby reducing the risks of flooding and erosion while raising the level of watercourses

¹⁰¹ [Biodiversity strategy for 2030](#), European Commission

¹⁰² [Consumption of Carnivores by Wolves: A Worldwide Analysis of Patterns and Drivers](#), 2020, I. Martins et al.

¹⁰³ [The situation of the wolf \(Canis lupus\) in the European union](#), An In-depth Analysis, 2023, European Commission

¹⁰⁴ [European Ungulates and Their Management in the 21st Century](#), 2010, M. Apollonio et al.

¹⁰⁵ [Ungulates browse the tree species we need for the future](#), 2023, WSL News

¹⁰⁶ [European Ungulates and Their Management in the 21st Century](#), 2010, M. Apollonio et al.

¹⁰⁷ [Wolves contribute to disease control in a multi-host system](#), 2019, E. Tanner et al.

¹⁰⁸ [The wolf in Slovakia](#), 2002, S. Find'o et al.

¹⁰⁹ [Evaluation of the Presence of ASFV in Wolf Feces Collected from Areas in Poland with ASFV Persistence](#), 2021, M. Szewczyk et al.

¹¹⁰ [Using Wolves as First Responders Against a Deadly Brain Disease](#), 2020, The New York Times

¹¹¹ [The global economic impact of ASF](#), Bulletin, World Organisation for Animal Health

¹¹² [Beaver: Nature's ecosystem engineers](#), 2020, R.E. Brazier

and soaking up water in the surrounding aquifers,¹¹³ increasing water reserves by up to 160%. Beaver ponds also contribute to ecological stability and resilience by boosting biodiversity in aquatic and wetland habitats, which in turn benefits surrounding crops thanks to greater numbers of pollinators and crop-pest predators. Moreover, water is up to 2.5°C cooler downriver of a beaver pond, which reduces thermal stress in fish and other wildlife. It is also purer, as beaver ponds act like filters, storing pollutants, nutrients and sediment. Managed wisely, beaver as a keystone species could provide low-cost, multi-faceted nature-based solutions for Switzerland, which is currently warming at twice the global average¹¹⁴ and is increasingly subjected to droughts, with significant impacts on its economy, society and ecology.

b. Wildlife tourism and education

Public debate, and indeed most research surrounding wolves and other large predators, invariably centres on the negative socio-economic impacts of livestock-wildlife and human-wildlife conflicts, with a noticeable bias towards wolves.¹¹⁵ But the presence of predators can bring substantial benefits in the form of commercial activities and wildlife tourism, generating direct income both through employment and tourist infrastructure.¹¹⁶ Their presence also leads to greater potential in education and research, not least into the natural value of wild places and the benefits of coexistence with large predators and their conservation.

Although wildlife tourism is currently only weakly developed in the Alps, it has enormous potential in Switzerland, particularly when set against the dramatic and picturesque Alpine backdrop. Nature-based tourism is growing and the wolf is considered the most charismatic of all Europe's terrestrial wildlife species.¹¹⁷ Its presence in Switzerland should be seen as an attribute and seized upon. Wolf-related touristic benefits were, in 2006, estimated to be worth over USD 35.5 million annually to Yellowstone National Park;¹¹⁸ today that figure is USD 40 million.

Italy's National Park of Abruzzo is currently engaged in a study to determine the direct benefits that the presence of wolves brings not just to the park but through spillover to the surrounding region. Acceptance of the wolf in local communities has grown with the realisation of its tourism benefits. New markets could also be explored and created, including "wolf-friendly" products made from livestock raised peacefully alongside wolves for example. Livestock farmers and their neighbours in local communities could diversify their income sources significantly by learning to live in harmony with the wolf.

Such initiatives need not be restricted to wolves. Beaver are also considered charismatic and are found in biodiverse landscapes, both traits that encourage wildlife tourism. They are already attracting attention and drawing in the crowds in Zurich.¹¹⁹ A 2007 study¹²⁰ found that a single beaver release site could potentially generate over £2 million a year for the local economy, tourism multiplier included.

¹¹³ [Journée internationale du castor : plutôt que des mégabassines, et si ces rongeurs étaient la solution ?](#) 2024, HuffPost

¹¹⁴ [Climate change](#), Federal Office of Meteorology and Climatology [MeteoSwiss](#)

¹¹⁵ [Why so negative? Exploring the socio-economic impacts of large carnivores from a European perspective](#), 2021, J. Rode et al.

¹¹⁶ [Non-consumptive use of wolves in tourism: guidelines for responsible practices](#), 2022, I. Kavčič et al.

¹¹⁷ [The twenty most charismatic species](#), 2018, C. Albert et al.

¹¹⁸ [Wolf recovery in Yellowstone: Park Visitor Attitudes Expenditures and Economic Impacts](#), 2008, J.W. Duffield et al.

¹¹⁹ [Zurich's urban beavers are crowd-pleasers](#), 2022, F. Kleinschroth

¹²⁰ [Economic impacts of the beaver: Report for the Wild Britain Initiative](#), 2007, R. Campbell et al.

Germany's Harz Mountains National Park successfully reintroduced the lynx to its spruce and beech forests and has branded itself a lynx-tourist destination, generating revenues of EUR 72 million in 2016, with EUR 9.4 - 15.3 million attributable directly to the big cat.¹²¹

Similarly, white-tailed eagles generate up to GBP 8 million each year for Scotland's Isle of Mull, supporting up to 160 jobs and creating a minimum of GBP 2.1 million of local income.¹²²

Such projects could easily be replicated in Switzerland with any or indeed all of the species singled out under the modified Ordinance. The interest and income generated could in turn help boost tolerance of wolves and other "conflict species", in both local communities and international visitors, leading to less persecution and creating a virtuous circle of cumulative causation. The economy and the environment need not be seen as "non-overlapping magisteria" or as conflicting priorities. Indeed, it is becoming increasingly apparent that socio-economic growth must be achieved together with a responsible attitude towards wildlife and nature.

c. Cultural, social and intellectual arguments

Wild animals also provide non-material benefits in the form of cultural, intellectual and social assets. Multiple studies show that increased connectedness with nature boosts mental health and personal wellbeing.¹²³ Places conducive to wildlife are also great places for people. Wolves, beaver and bears in particular are important generators of culture, tradition and ethnography¹²⁴. It is no coincidence that some of humanity's first recorded art forms are bears, wolves and ibex painted on cave walls. The ibex also features, ironically, on the canton of Grisons' coat of arms.

The guidelines of the platform Wildlife and Society (WISO), which was set up by the X Alpine Convention in 2009 and to which Switzerland is a Party, advocate "the right of existence of all native wildlife-species" and recognise "their intrinsic value".¹²⁵ Most people do indeed assign value to the existence and preservation of wildlife and believe that society has a responsibility to pass on complete and healthy ecosystems to future generations.¹²⁶ Similarly, the recovery and legal protection of large carnivores remains a societal desire. The majority of rural inhabitants across 10 European countries want large carnivores protected according to a 2023 survey, with 68% of participants stating that they should be strictly protected and 72% agreeing that they have a right to co-exist with humans.¹²⁷

In Switzerland, although a third of the population surveyed in 2024 was in favour of preventative wolf culls, 46% rejected them.¹²⁸ The same survey also found that approval for the reintroduction and re-establishment of lynx and beaver stood at 47% each, rising to 76% for ibex, while the re-establishment of wolves was considered important by 32% of respondents. According to Felix Näscher, WISO's first President, "sustainable wildlife management has to be an expression of a will, how to deal with our wildlife species—

¹²¹ [The Economic Impact of Lynx in the Harz Mountains](#), 2016, AECOM

¹²² [The Economic Impact of White-tailed Eagles on the Isle of Mull](#), 2022, RSPB

¹²³ [Wildlife tourism in reintroduction projects: Exploring social and economic benefits of beaver in local settings](#), 2020, R.E. Auster et al.

¹²⁴ [Cultural dimension of wolves in the Iberian Peninsula: implications of ethnozoology in conservation biology](#), 2011, F. Alvarez et al.

¹²⁵ [Guidelines "Large Carnivores, Wild Ungulates and Society"](#), 2011, WISO

¹²⁶ [Social and ecological benefits of restored wolf populations](#), 2007, A. Weiss et al.

¹²⁷ [Understanding rural perspectives: A survey on attitudes towards large carnivores in rural communities](#), 2023

¹²⁸ [Third of Swiss support preventative wolf culls](#), 2024, Swissinfo

by taking into account, by balancing and by harmonising ecological, economical and socio-cultural interests: A decision of all stakeholders involved is required".¹²⁹

3. It is not science-based and deflects from the real difficulties Alpine farmers face

After all the efforts made to repair the historic wrongs done to wildlife and nature, and after all the funding and success of the federally led protected species reintroduction and recovery programmes, certain lobby groups and some politicians are seeking to change the law and turn back the clock. Of all the carnivores, the wolf is the most vilified, often portrayed as a bloodthirsty predator that wantonly kills livestock and poses a threat to humans. While the debate surrounding wolves has long been divisive and polarised, it is also increasingly subject to untruths and exaggerations that further lower public acceptance and stoke public fears while seriously subverting the role of science in this species' management.

It is therefore time to dispel certain remaining myths.

a. Myth: wolves "threaten and endanger agriculture"

Wolves do predate livestock and such attacks represent a source of conflict in most areas in which the two overlap. While there is no denying the fact that predation by wolves can have profound economic and emotional impacts on individual farmers, this emotive issue is also often seized upon and exaggerated. The FOEN's claim that "the growing wolf population is getting out of control. Without the possibility of regulation they threaten and endanger agriculture"¹³⁰ is pure hyperbole. Ridding the country of wolves will not get rid of the problems that Alpine farmers face. Swiss Alpine farming had been in decline long before the reappearance of the wolf, undermined by globalisation, depopulation, low agricultural profitability, a lack of innovative products and the loss of bio-cultural diversity. More frequent droughts, extreme weather conditions and stricter environmental regulations only add to the problems that livestock farmers face. Sheep and goat husbandry in Switzerland's mountainous regions is no longer profitable despite being heavily subsidised and is therefore often practised as a sideline. This, combined with a failure to promote functional coexistence and the widespread dissemination of falsehoods, makes farmers less likely or less willing to use deterrents.

And so the predation continues. The wolf is made a scapegoat and an already weakened pastoral activity is further stigmatised by pitting it directly against environmental protection, in a debate that is symbolic of wider societal divisions such as the urban versus rural split or that separating right from left-wing politics.

b. Myth: culling wolves reduces damage to livestock

Fewer wolves does not necessarily mean less damage.¹³¹ Multiple studies, including some conducted in Switzerland, show that reactive regulation aimed solely at decreasing livestock predation does not work and can actually prove less effective than livestock protection measures.¹³² Observations across several cantons in the last few years suggest that solitary and/or transient wolves, young, inexperienced wolves whose parents have been shot and wolves whose packs have been dissolved are more likely to target livestock. And while shooting solitary "problematic" wolves can lower predation in the short term, eliminating one of the breeding adults can also backfire if its replacement proves more "problematic", as happened with the Mont Tendre pack in the canton of Vaud's Jura mountains.

¹²⁹ [Lynx in the Alps: Recommendations for an internationally coordinated management](#), 2016, KORA Bericht Nr.71

¹³⁰ [Rapport explicatif relatif à la révision du l'ordonnance sur la chasse \(OChP, RS 922.01\) — partie 1 « Régulation de loups et de bouquetins »](#), du 1 novembre 2023, FOEN

¹³¹ [Does Wolf Management in Latvia Decrease Livestock Depredation? An Analysis of Available Data](#), 2023, J. Suba et al.

¹³² [The effectiveness of livestock protection measures against wolves \(Canis lupus\) and implications for their co-existence with humans](#), 2020, A. Bruns et al.

In the case of proactive regulation, livestock predation has been shown to actually increase following pack elimination, thereby defeating the cull's alleged purpose.¹³³ As the IUCN/SSC Canid Specialist Group explained in its 2023 letter to the Swiss government "The maintenance of stable wolf packs will result in less conflict overall than disrupted packs. The killing of wolves breaks up pack structures, disrupts population structure, and through enhancing the dispersal of individuals into recently vacated areas disrupts the wolf population and leads to more conflict". The solution is livestock protection, including both traditional methods such as electric fences, fladry (ropes hung with colourful flags), corrals, guardian dogs and the presence of shepherds, as well as innovative options including light and sound deterrent systems and Artificial Intelligence (AI)-based alert systems.

c. Myth: culling wolves makes them shy

Ahead of the 2023-24 wolf cull, the Federal Council expressed the hope that the upcoming proactive regulation measures would "make the wolf fearful again".¹³⁴ The claim that culling makes wolves shy is frequently made but according to the Canid Specialist Group¹³⁵ it is "unproven and unsubstantiated" and "misleads the public", because "[k]illing wolves in proximity to settlements will not by itself create more shyness in wolves that inhabit a landscape densely occupied by people and infrastructure". Wolves are highly adaptable to human presence. With permanent wolf ranges averaging a density of 90 persons/km² across Europe¹³⁶ they have to be. But it is they that are paying the price.

d. Myth: wolves threaten tourism and biodiversity

Of all the accusations levelled against the wolf, these are arguably the most ridiculous. Firstly, wolves do not threaten Switzerland's biodiversity.¹³⁷ Wolves, just like beaver, are keystone species that exert disproportionately large and positive effects on their surroundings relative to their abundance. They increase biodiversity. It could be argued that it is the herds of sheep and cows, many of which are kept as a hobby or secondary income, put out to graze in remote and thus often unprotected Alpine pastures, that are competing with and against wild fauna and flora. Such areas could and perhaps should be left for wildlife with minimal human intervention, thereby helping to maintain them naturally, as studies in Switzerland's sole National Park show is possible.

It has also been argued that wolves threaten Swiss tourism¹³⁸ both directly by threatening people and indirectly by killing the livestock that attract tourists to Switzerland's iconic Alpine pastures. As we have outlined above however, the presence of charismatic animal species, particularly large predators and especially wolves, could help boost tourism. Neither do wolves pose a "danger to hikers" or tourists in Switzerland, unlike cows whose attacks on humans, including tourists, have resulted in multiple deaths and serious injuries.

The authorities however prefer not to mention this. Nor do they keep a tally. It is so much easier to blame the wolf.

The path we are currently treading will likely lead to aggravation on all fronts rather than to sensible coexistence. The price of coexistence with wolves and other "conflict species" must be shared fairly across society. Yet negotiated compromises are all too often swept off the table because of trivialities or personal whims, making it increasingly difficult for the parties involved to work together. National referendums

¹³³ [Effects of Wolf Mortality on Livestock Depredations](#), 2014, R. B. Wielgus & K. A. Peebles

¹³⁴ [La chasse aux loups est ouverte cet hiver en Suisse](#), 2023, Le Matin online

¹³⁵ [Wolf Management Plans of Switzerland](#), 2023, Letter to FOEN, IUCN/SSC Canid Specialist Group

¹³⁶ [Assessment of the conservation status of the Wolf \(Canis lupus\) in Europe](#), 2022, Council of Europe

¹³⁷ [Maienfeld Declaration — Wolf Policy as a Problem for Nature Conservation](#), 2024

¹³⁸ [Le loup est une menace pour les éleveurs et pour le tourisme. Qu'entend faire la Confédération?](#) 2022, Assemblée fédérale

cannot be held *ad infinitum* and their outcomes should be respected. Laws should be robust and upheld and protected wildlife should be fully protected, both on paper and in the field.

The transition to more convivial human-wildlife interactions is still possible but it will require both solidarity and compromise as well as management strategies with clear, unbiased communication to foster trust and reduce the potential for conflict between parties.

4. It is deeply damaging to Switzerland's image

Switzerland is admired and respected around the world for its pragmatism, neutrality, modernism and striking natural beauty. It is, not without reason, the home of the Bern Convention, the headquarters of the United Nations Human Rights Council, the WWF and the WEF and the land of the Red Cross. At a time when nature and wildlife are under growing pressure and as one of the world's oldest democracies and most prosperous nations, Switzerland should lead the way in matters of nature restoration and coexistence.

Coexistence with wildlife is not always easy and can sometimes require sacrifices. Conflicts, when they arise, should be resolved through applicable nature legislation, guidelines and treaties, not through the law of the jungle. All wild fauna species including wolves have legal claims to existence. They also have moral ones. And they do have public support.

We must therefore work together to find ways to coexist both with each other and with other species, even "troublesome" ones.

We must, in the words of the Federal Constitution, "promote the common welfare" and "internal cohesion" and "lay down principles" for "the preservation of the diversity of fish species, wild mammals and birds."

If Switzerland cannot cope with and is unwilling to protect its wolves, beaver and ibex, can we really ask and expect the Global South to make way for its tigers, leopards, lions, pumas, bears, hippos and elephants, which are far more dangerous and cause far more damage? Are people really expected to believe that Switzerland, with all its wealth and resources, cannot find a way to cope with its large predators or with species it labels "conflict".

It is time to show solidarity with our wildlife.

It is time to show solidarity with livestock farmers.

It is time to restore the values that Switzerland embodies and for which it is respected the world over, as a peaceful, open-minded and collaborative nation.

Lucie Wuethrich, BSc, MSc, for WildEurope
27 June 2024

This petition is now closed. Thanks to all who signed.

1. The Gallifrey Foundation, Switzerland
2. Geonox, Switzerland
3. Health-and-Forest.org, Switzerland
4. IG Berner Wald, Switzerland
5. Nzatu Europe, Switzerland
6. Rewilder Weekly, Switzerland
7. Global Youth Biodiversity Network, Europe
8. Humane Society International, Europe
9. Vétérinaires pour la Biodiversité, Europe
10. Global Rewilding Alliance, International

11. Grey Corp LLC // WilzFoto LLC - Wildlife Conservation Advocacy and Visual Documentation, International
12. Centre4NI, Belgium
13. The Wolf Conservation Association Europe, Belgium
14. Vogelbescherming Vlaanderen, Belgium
15. Animal Alliance of Canada, Canada
16. Animal Protection Party of Canada, Canada
17. Nature Nova Scotia, Canada
18. WeHowl, Canada
19. Lipensko pro život, z.s., Czech Republic
20. Danmarks Vilde Natur, Denmark
21. Ulvetid, Denmark
22. ASPA-Vosges, France
23. AVES, France
24. CAP Loup, France
25. Fondation Brigitte Bardot, France
26. NOÉ, France
27. Pôle Grands Prédateurs, France
28. Rewilding France, France
29. Société Française pour l'Etude et la Protection des Mammifères (SFEPM), France
30. Deutscher Tierschutzbund e.V., Germany
31. Freundeskreis freilebender Wölfe e.V., Germany
32. Intalcon Foundation, Germany
33. Naturschutzbund Heidekreis, Lower Saxony, Germany
34. Ocean. Now!, Germany
35. Pro Wildlife e.V., Germany
36. Wildtierschutz Deutschland e.V., Germany
37. Action for wildlife, Greece
38. BiodiversityGR, Greece
39. Callisto — Wildlife and Nature Conservation Society, Greece
40. Society for the Protection of Prespa, Greece
41. Untapped Lab, Hong Kong
42. Leefmilieu, Netherlands
43. Rewilding Europe, Netherlands
44. Union of Nature Foundation, Netherlands
45. Fundacja Dziedzictwo Przyrodnicze, Poland
46. Teraz Lasy, Poland
47. Associação de Defesa do Paul de Tornada - PATO, Portugal
48. Palombar — Nature and Rural Heritage Conservation, Portugal
49. Portuguese Association for Biodiversity Conservation (FAPAS), Portugal
50. Alianță Pentru Combaterea Abuzurilor, Romania
51. Alpe Adra Green, Slovenia
52. Dinaricum Society – Society for Conservation and Sustainable Development of the Dinarics, Slovenia
53. Umanotera – The Slovenian Foundation for Sustainable Development, Slovenia
54. Asociación para la Conservación y Estudio del Lobo (ASCEL), Spain
55. Climate Justice Charter Movement, South Africa
56. Cooperative and Policy Alternative Centre (COPAC), South Africa
57. Wilderness Foundation Global, South Africa
58. Constructive Voices, UK
59. Peter Jeffs Holistic, Wiltshire, UK
60. The International Otter Survival Fund, UK

61. In Defense of Animals, USA
62. International Wildlife Coexistence Network, USA
63. The Rewilding Institute, USA
64. Protect Foundation, USA

NGOs that signed after the deadline

65. Society for Conservation Biology (SCB), Europe Region
66. Biodiversity Conservation Center, Czech Republic
67. Le Klan du Loup, France
68. Tendua pour la sauvegarde de la biodiversité, France
69. BUND Naturschutz in Bayern e. V., Germany
70. Federazione nazionale Pro Natura, Italy
71. Green Impact, Italy
72. Ecologistas en Accion, Spain
73. Red Ecologistas Malagueña, Spain
74. Born Free, UK
75. Katie Adamson Conservation Fund, USA