Helsinki, April 23rd, 2025.

Large carnivores are strictly protected by the EU´s Habitats Directive 92/43/EEC and the hunting of these species is forbidden under Article 12. Any exception to this protection must be based on scientific evidence, taken as a last resort when there is no other alternative available and targeted to the identified individual(s) in order to resolve a specific problem.

As already established by The Supreme Administrative Court of Finland, the practice of using the exceptional hunting permits to limit or control the population numbers of a strictly protected species is against the purpose of the Habitats Directive which is to ensure that these species are maintained, or restored, to a favourable conservation status within the EU. This was also clearly stated by The European Commission in its reply to a Parliamentary Question back in 2022[1].

The so-called population management hunting of large carnivores is in fact indiscriminate killing that is not scientifically justified or in line with EU legislation.

The European Commission in its own in-depth analysis (2023) about the wolf situation in the European Union highlights the ineffectiveness of population management hunting as follows: *"***Indiscriminate killing (hunting) does not appear to reduce wolf attacks on livestock unless it is carried out on such a large scale that it actually reduces the density of the wolf population over large areas.***"* However, this type of hunting is not compatible with the objectives of the Habitats Directive.

Regarding the Finnish government´s proposal for amending Section 41 of the Hunting Act, there is no justification to claim that hunting of large carnivores is necessary for public safety reasons.

In the case of wolves, no Finnish citizen has died because of a wolf in the last 140 years. Only one bear has fatality attacked a human during the 20th century, when a jogger fell between a mother and her cubs. For the lynx and the wolverine, there are no recorded human deaths since Finland's independence.

In addition, the Habitats Directive Article 16(1)(c) already contemplates the possibility of removing individual animals that behave abnormally and are a cause of concern for public safety.

The Habitats Directive, which is the EU legislation, takes precedence over national legislation, and Member States must ensure that national legislation and administrative practices comply with EU law.

Population management hunting is indiscriminate killing that targets individual animals that haven't caused any harm. One example of this were the hunting permits granted to kill the entire Saunajärvi wolf pack in Kuhmo back in 2022. This was a wolf family of eight living in the wild causing no threat or harm to anyone. The Administrative Court of Northern Finland banned the execution of the permits.

The often-used claim that without hunting large carnivores become dangerous to humans does not stand up to scrutiny. **There is no scientific evidence to support the claim that wolves must be hunted to maintain their fear of humans[2].**

[1] https://www.europarl.europa.eu/doceo/document/P-9-2021-005412-ASW_EN.pdf
[2] https://www.researchgate.net/publication/345169080_How_to_deal_with_bold_wolves

During the 30 years that wolf has been protected in Finland, while wolf populations have recovered in many European countries, in Finland the wolf is still classified as critically endangered, fragmented in two sub-populations, with stagnated growth and showing signs of poor genetic viability. The reason for this that wolves are allowed by the authorities to be hunted both legally and illegally.

In regard to the setting of the reference values for the favourable conservation status, the European Commission's guidelines state that these values must be based on ecological and biological considerations and using the best available scientific expertise, not on political interests.

The Finnish wolf population is still critically endangered and therefore with an unfavourable conservation status. Governmental proposals are urgently needed to help the wolf reach a favourable conservation status, not to find justifications for them to be hunted.

The last reporting exercise under Article 17 of the Habitats Directive for the period 2013-2018 concluded that **only one of the seven biogeographical populations of the wolf in the EU has a favourable conservation status[3].**

The Court of Justice of the European Union has in fact confirmed that a protected species cannot be hunted when their conservation status is unfavourable at national level[4]. This means that even with the downlisting of the protection status for the wolf, the hunting for population management purposes will not be possible and therefore the systematic wolf eradication that takes place in the reindeer herding area is against the law.

The Ministry of Agriculture and Forestry sees large carnivores as a problem and a burden to specific interest groups, while in fact they are protected because they are essential to the health of nature and provide ecosystem services that benefit society as a whole.

A consequence of the low numbers of wolves and other large carnivores is the explosion in the deer populations. Annually there are an estimated 6,000 traffic accidents because of deer in Finland. The estimated annual damages to agriculture and forestry by the deer population are costing up to 120 million euros to Finnish society[5]. In addition to these damages, there has been a significant rise in tick-borne diseases.

It is the view of Luontoliitto is that this proposal from the Finnish government to allow the hunting of large carnivores for public security reasons lacks a scientific and legal basis and appears instead to be based on protecting the interests of groups that support hunting.

The majority of Finnish citizens do not hunt and polls show they in fact want wolves, bears and lynx to be protected and allowed to live in our landscapes[6].

There is a strong conflict of interest when the management of large carnivores is done by an institution that represents the interests of hunters.

Instead of finding legal loopholes to allow the hunting of large carnivores, efforts should be put on supporting educational programs for coexistence, promoting humane management methods, and funding *incentive compensation schemes* such as the one used for the Golden Eagle.

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[3] At EU level, only three of the nine wolf sub-populations are classified as “Least Concern” in the assessment conducted by the IUCN Large Carnivore Initiative for Europe in 2022, while the others are classified as “Near Threatened” or “Vulnerable.

[4] https://curia.europa.eu/jcms/upload/docs/application/pdf/2024-07/cp240118fi.pdf

[5] https://tapio.fi/wp-content/uploads/2023/10/SORKKA-raportti-08102023.pdf

[6] https://www.eurogroupforanimals.org/news/new-poll-shows-eu-citizens-stand-wolves

Coexistence with large carnivores is possible with the right tools and support from the authorities as it has already been shown in many European countries[7].

As a nature protection organization, Luontoliitto requests a transfer of competences for the protection of large carnivores to the Ministry of the Environment. A petition for this was signed by more than 5.000 people and delivered to the Finnish government in the recent days[8].

After many of the so-called population management hunting permits for large carnivores having been declared illegal by the Supreme Administrative Court of Finland and after thousands of large carnivores having been unnecessarily killed, there is a strong need for the management of large carnivores to be done by responsible authorities that take into account democratic and science-based policies for the interests of nature and all Finnish citizens.

In light of the ongoing loss of species and for the sake of the planet and future generations, Finland must ensure the protection of the wolf and all large carnivores by promoting a peaceful coexistence.

[7] More than 80 projects funded through the European Commission LIFE programme since 1992 have demonstrated the efficiency of coexistence measures such as livestock guarding dogs and fencing. These measures have proven more effective than culling large carnivores to protect livestock. Farmers across the EU should be appropriately supported to install and maintain such protection systems.

[8] https://luontoliitto.fi/kansalaiset-vaativat-petteri-orpon-hallitusta-siirtamaan-suurpetojen-suojelu-ymparistoministerion-vastuulle/