

# ***DOWNLISTING THE WOLF IN THE EU AND EUROPE***

***a deliberate departure of EU  
Politics  
from Scientific Evidence and  
the EU Legal Framework***

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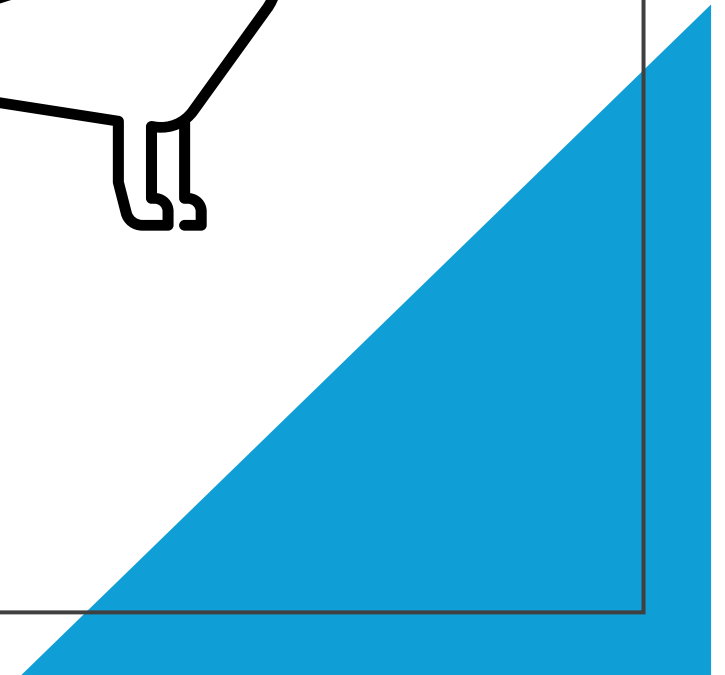
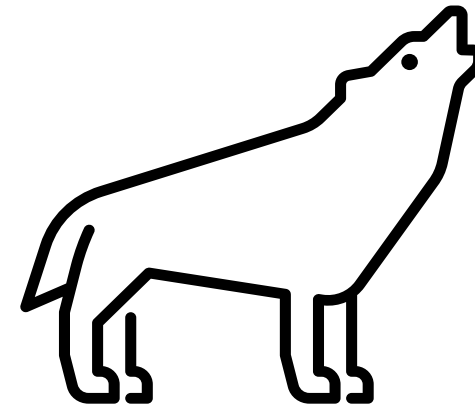
*Lifescape, Rewilding Law Group  
Webinar*

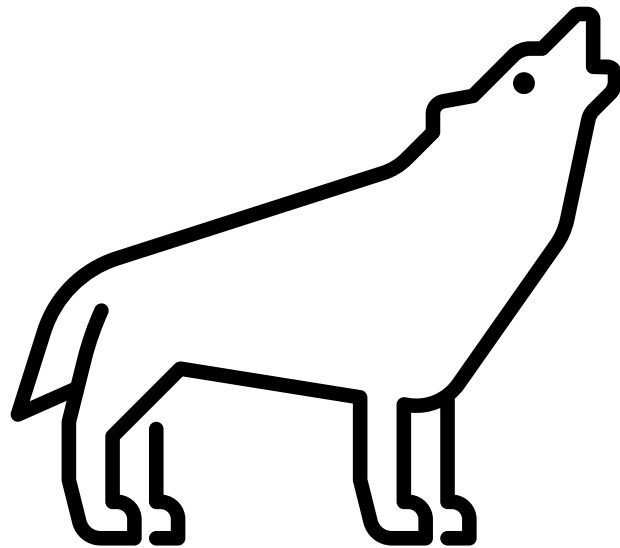
*1° December 2025*



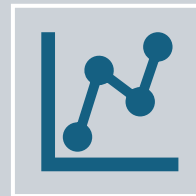
# the devil is in the references

**The European Commission (EC)  
science- base for downlisting is a  
single report ( non- peer reviewed and  
non academic) produced by a Brussels-  
based consultancy funded by the EC  
under a service contract.**





**A report produced for the European Commission by Blanco and Sundseth in December 2023**



**was used as a scientific benchmark to propose the downlisting at the Bern Convention and later on the same report was used as a basis for downlisting under the EU Habitat Directive**

# Democratic process? not really. A few missing bits.

Better regulation

Impact  
assessment

Stakeholder  
consultation

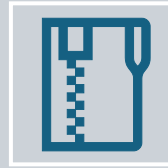
Urgent procedure  
at the European  
Parliament instead  
of ordinary

Vote with qualified  
majority instead of  
unanimity at  
Council

misrepresentation  
of data and  
interests

# The lack of legal requirements for the farming sector to apply preventive measures

- **Fences**
- **Electrification for the fences**
- **Human Guardian**
- **Guardian dogs**
- **Night recovery for the animals**



EU Agri policy (CAP) finances **preventive** and **compensatory** measures



Preventive measures are a pre-requisite for **co-existence**



**Lack of a legal obligation to use preventive measures despite the subsidies therefore**  
**Co-existence is a voluntary scheme.**

# Litigation: two Wolf Cases at the ECJ.

**Applicants:** Green Impact ETS (Rome, Italy), Earth ODV (Rome, Italy), Nagy Tavak és Vizes Élőhelyek Szövetsége (Győr, Hungary), LNDC Animal Protection APS (Milan, Italy), One Voice (Strasbourg, France)

+ Act of Interventions: dozens of other Associations in the EU;

**Defendants:**

European Parliament,  
Council of the European Union,  
European Commission

## Case T-634/24: Challenging Decision (EU) 2024/2669

- The case, registered as T-634/24, was submitted in Dec.2024 assigned to the Ninth Chamber, and published in the EU Official Journal on **17 February 2025**.
- ✓The challenge covers the proposal formally presented and the vote at the Standing Committee of BERN CONV on 3 December 2024, as well as all subsequent related acts.
- The action is based on two grounds: first, breach of Article 191(3) TFEU, Article 6(1) TEU and Article 37 of the Charter, due to lack of proper scientific assessment; second, violation of proportionality, precaution and best available science, with misuse of powers and inadequate reasoning, since the decision rests **on a political compromise lacking scientific basis**.



## Case T-563/25: Challenging Directive (EU) 2025/1237

- ✓ On 15 August 2025, the applicant NGOs lodged Case T-563/25 before the General Court, challenging Directive (EU) 2025/1237. **The case was published on 13 October 2025 in the Official Journal.**
- ✓ A request by Green Impact and al. was made to join the proceedings with Case T-634/24, and the defendant institutions raised no objections.
- ✓ The main plea highlights a serious procedural defect: the Directive was adopted under the ordinary legislative procedure (Article 192(1) TFEU), instead of the special procedure in Article 19(2) of the Habitats Directive, which requires unanimity in the Council. The misuse of legal basis also altered the form of the act, not suited for a Directive by rather for a Decision.
- ✓ Other pleas concern the denial of participatory rights under the Aarhus Regulation, inadequate reasoning, and failure to rely on updated as well as independent and state of the art scientific evidence.

Lawyers, Wolf Cases at the EUCJ.  
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# Thank you for the support

The logo for the Gallifrey Foundation consists of a dark blue rounded rectangle behind a light blue rounded rectangle. The text "Gallifrey Foundation" is centered in the light blue area.

**Gallifrey  
Foundation**

The logo for TENT - The European Nature Trust consists of a dark blue rounded rectangle behind a light blue rounded rectangle. The text "TENT - The European Nature Trust" is centered in the light blue area.

**TENT – The  
European  
Nature Trust**

# EU Member States Lex for 30+ years before downlisting

## Rule of law: but which one?

Lack of compliance with the EU Habitats Directive;

Ignore the rulings of the European Court of Justice;

Unreliable monitoring of wolves populations

Failure to rely on 'real' science.

Failure to monitor and prosecute illegal killing

European Commission and the EU infringement procedures: obscured in practice?

- **Inaction of the European Commission**
- **Ungrounded declarations:**
  - Wolves are now 'many' (*compare to when?*)
  - wolves attack humans (*no back-up data*)
  - Member States ask for 'management practices' (*not founded*)
  - Farming sector asks for controlling wolves (*a minority of the sector*)

# Lessons learnt - Member States legislation and Wolf under the EU Habitats Directive: clash with EU law

## Bad transposition



MS legislation (wrongly transposed) allowed ungrounded killing of wolves for decades despite strict protection;



Lack of knowledge and/or use of ECJ rulings by national authorities :

## Bad implementation

- Lack of internal processes for securing ‘good conservation status’;
- Lack of knowledge or acknowledgment of the role of wolves in the ecosystems ( ecological engineer);
- Lack of designation and management of protected areas;

# EU Member States' position **after** EU downlisting ( June 2025) *(18 months to traspose or keep strict protection)*

**Licence to  
Kill**

**Strictly  
protect**

**Middle way**



# Moving forward

## Bern Convention



Scrutiny: Introduce an independent scientific assessment of proposals before being considered for discussion and vote



Re-balance voting schemes: limit the power of the EU



Expand democratic participation

## European Union

- A much needed **fit - for purpose conservation law based on an ecosystem based approach** rather than a list of species (proved to be easily open to serve political interests).

# Thank you for your attention

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[www.greenimpact.it](http://www.greenimpact.it)

Web page, Wolf and EU Policy

<https://www.greenimpact.it/science-policy-and-laws-to-prevent-the-killing-of-wolves-in-europe/>

