

ABOUT THIS WORK

This work is part of the Lifescape Project's [Rewilding Law Innovation Lab](#), through which we share practical learning from working with projects on the ground to overcome potential legal barriers or maximise positive legal impact for rewilding. We want other organisations and rewilding practitioners to adapt and reuse it, so the impact of our legal innovation is upscaled. We work to identify opportunities for wider legal and policy reform that could better support rewilding at scale. Our aim is not only to help projects navigate existing systems, but to help shape legal systems better equipped for the environmental challenges of the future.

Rewilding needs law that can keep up – find out about our [Rewilding Law Innovation Lab](#) on our [website](#).



AT A GLANCE

Collaboration in practice. This case study is part of a collaboration between [The Lifescape Project](#), [Rewilding Europe](#), and [Rewilding Spain](#). It builds on systemic issues identified in various rewilding landscapes and developed in the [Rewilding Law Hub](#) legal guidance notes. It shares practical learnings from work on the ground to understand how existing legal frameworks can support rewilding, where legal barriers remain, and where targeted legal change may be needed.

What is being explored? We are working to test how far the current legal framework can accommodate large herbivores living in genuinely wild or semi-wild conditions in designated rewilding areas. The case study focuses on horses, Tauros, and European bison roaming in rewilding areas managed by Rewilding Spain in the Iberian Highlands, Castilla-La Mancha, and on the practical routes available to reduce the impact of livestock rules designed for conventional farming.

Why does it matter? Large herbivores drive ecological processes, such as grazing, disturbance and nutrient cycling, on which functioning ecosystems depend. Many of the wild animals that filled this ecological niche are extinct or no longer present in Europe (such as auroch and tarpan). Although ecological proxies can be used in their place, EU and Spanish law classify many of these proxies as production animals/livestock, making them subject to registration, identification, movement and disease-control rules designed for farming, not for free-ranging conservation herds. This current regime restricts the potential ecological role that these animals can play and creates safe and healthy and animal welfare concerns. Making the most of existing opportunities to relax this normal regime and exploring opportunities for broader legal change is important to allow large herbivores to fulfil their vital ecological potential in functioning ecosystems.

Main lesson. Real progress is possible under current law, but only species by species, and largely through administrative discretion that has to be re-established each time. Equines can be recognised as living in semi-wild conditions, unlocking meaningful regulatory relief, and this has now been achieved in practice. Bovines such as Tauros remain more tightly bound to livestock rules, and European bison sit in an emerging middle ground which is tied to the discussion of whether they are native to Spain. That is workable, but it offers little certainty. The question this work raises, and the conversation it is meant to start, is whether a new durable, function-based legal category for non-native animals used for these purposes would give them a legal home of their own, instead of relief negotiated on a case-by-case basis.

THE CHALLENGE IN BRIEF

Across Europe, rewilding practitioners want to bring large herbivores back as free-ranging animals and keep colliding with a legal framework that treats these animals as farmed livestock. This note looks at how far Spanish law can already accommodate the use of large herbivores living in wild or semi-wild conditions in designated areas of Castilla-La Mancha (Spain) identifies the conditions that are still missing and the legal reforms needed. The species involved are equines (including Przewalski, Pottoka, and Serrano horses), Tauros (a bovine bred as an ecological substitute for the extinct aurochs), and European bison.

The core difficulty is one of classification. Under EU law, equines and cattle are “kept animals” and they are regulated through the frameworks built for farming: registration, identification, movement controls, disease control health, and welfare. In Spain, the animals in the Iberian Highlands are registered in the Registro General de Explotaciones Ganaderas (REGA), the register of livestock holdings. This means that the livestock framework applies to them in practice, even where they live in semi-wild conditions however the framework is applied in a much more relaxed manner. The label is not inherent to the animal, it follows from the registration.

Spain also has a decentralised system: the State sets the main frameworks in compliance with EU law, and the autonomous regions develop and apply them, provided that they do not conflict with State law. Rewilding herds therefore sit at the intersection of EU law, national law, and regional implementation.

Against that backdrop, the legal routes to achieving wilder herds under this case study fall into three groups, which also frame the rest of this note:

- Achievable now: recognising equines as living in wild or semi-wild conditions, using the existing equine-holding category; and having European bison and Tauros in grazing conditions, already permitted by adjusting the type of registered holding.
- Dependent on authority discretion: a conservation centre (núcleo zoológico) status for European bison, and a route for mixed holding with horses and cattle.
- Requiring legal reform: a new and durable legal category for these animals setting out a specific legal regime applicable to these large herbivores species when used for natural grazing.

Why a wilder status matters

Ecological restoration is about restoring ecological function, not only physical habitat and large herbivores are not incidental to a restored ecosystem. Their grazing, browsing, trampling, and nutrient cycle are an important restoration mechanism, shaping vegetation, maintaining mosaics, and support food chains. Even the possibility of leaving carcasses on site plays a fundamental role: it feeds the scavengers and return nutrients to the system, including soil, improving its quality. Many of the wild animals that once filled this niche are extinct or absent from Europe, such as the aurochs and the tarpan, so rewilding uses ecological substitutes in their place.

A framework that can protect a habitat but cannot lawfully accommodate the animals that make it function is incomplete. Treated as production animals or livestock, free-ranging herds are subject to handling, identification, and movement rules designed for farms, the opposite of minimal intervention management that lets them do their ecological work.

Finding lawful routes to a wilder status is therefore not a technicality, it is what makes rewilding with large herbivores possible at all.



Why the current legal regime restricts nature restoration

Generally treated as livestock, free-ranging herds carry the full farm rulebook: ownership regimes, individual identification and registration, movement controls and area requirements, routine handling and health checks, disease control, vigilance and welfare rules, and rules on disposal of carcasses. A rulebook that may make sense for animals intended to go for human consumption, runs against the natural behaviour of these animals, the social structures of the herds, and their natural capacity to fight off predators.

From a health and safety perspective, applying routine handling requirements to large animals such as European bison or Przewalski's horses also introduces risks for veterinarians, herd managers and technicians who must carry them out – risks that minimal intervention management would largely avoid. There is a parallel welfare tension: the gathering, restraint, and individual health checks the framework requires can generate stress for animals intended to live as naturally as possible. Both illustrate the same mismatch: obligations designed for intensively managed stock are being applied to free-ranging herds.

Each of these legal obligations works against minimal, or ideally non-intervention and free management that lets the animals do the ecological job that their now extinct wild ancestors would have done. The handling and individual identification are precisely what wild animals are never subject to. Health obligations may have a negative impact on the well-being of the animals and can have a significant negative impact in other species and even ecosystems.

In addition, the removal of carcasses deprives scavengers of food they depend on. The movement control rules also sit awkwardly with animals that would ideally range freely in order to fulfil their vital ecological niche. The law is not hostile to rewilding so much as built for a different purpose, and that mismatch, not any single rule, is the obstacle we are trying to overcome through our work with Rewilding Spain.



Neil Aldridge/Rewilding Europe

What worked: wild or semi-wild status for horses

Following a process begun in September 2024, the regional authority in May 2026 recognised wild or semi-wild status for three of Rewilding Spain's equine holdings, relying on an established process that is recognised at an EU level and then filtered down to a regional level. This means that for the first time in the region of Castilla La Mancha, more than one hundred horses hold this status. This is not unprecedented nationally: several Spanish regions, including Castilla y León, Extremadura, Galicia and Madrid, have already recognised wild or semi-wild areas. The significance is that it is a first for the region of Castilla La Mancha.

Even more broadly, several EU member states have used this possibility and have seen their own areas recognised as wild or semi-wild for equines, for example in Denmark, France, Belgium, and the Netherlands.

A wild or semi-wild designation for equines is the clearest example of a route already being accepted in practice, and the one most worth setting out as a replicable process for other organisations to follow. The semi-wild route does not turn the horses into wildlife in the full legal sense. It keeps them within equine/livestock law, but under a lighter regime designed for populations living in wild or semi-wild conditions. This matters because it tells practitioners what they are actually applying for: a special category of equine holding, not a reclassification as wildlife.

The legal foundation sits at two levels and understanding it is what makes the route transferable to other regions and projects. At the EU level, regulations expressly recognise that some horse populations live in wild or semi-wild conditions in defined areas and need tailored treatment: member states may exempt such defined populations from the ordinary identification requirements, but – and this is the decisive condition – only whilst the animals remain effectively separated from any domestic use. Spanish law gives effect to this through its rules on equine holdings, which include a specific category of wild or semi-wild holdings: defined populations of equids living in wild or semi-wild conditions in certain areas, including protected and other natural areas and mountain areas, provided the animals do not leave those areas.

For recognised holdings, the framework provides relief from a number of rules built for the conventional domestic keeping of horses. The single most important relief is on identification, others concern siting and infrastructure, as summarised in the table.

OBLIGATION	CONVENTIONAL EQUINE HOLDING	RECOGNISED WILD OR SEMI-WILD HOLDING
Individual identification	Every animal microchipped and passported. Each foal must be identified and registered within 12 months after birth, and, in any event, before it leaves its holding of birth.	Not required for the defined population whilst outside domestic use and human control and so long as they do not leave the defined area.
Perimeter fencing / enclosed site	Required	Not required, natural barriers such as water or terrain can contain the herd instead.
Cleaning and disinfection systems	Required	Not required
Isolation space for animals suspected of disease	Required	May be exempt from having a specific enclosed space for animals suspected to be carrying infectious diseases.
Dedicated infrastructure for manure-management	Required	Not required
Minimum siting distances (200 m from other holdings; 100 m from railways/motorways; 25 m from other public ways)	Required	Not automatic exemption, but the authority may waive them on justified grounds (health, welfare, geography) and pastures are excluded from the 200 m rule.
Water supply and animal-handling facilities	Required	Required. Only small capacity holdings are exempt (it may be possible to have simultaneous REGA in the same holding).

These are not paperwork savings: they are what makes minimal intervention management lawful. The identification derogation is the keystone: a free-ranging herd is meant to live without routine handling. Microchipping and passporting every animal soon after birth would force exactly the gathering, restraint, and human contact that wild living animals must ideally avoid.

Removing the fencing requirements gives the herd freedom to move and shift with the seasons, grazing a moving mosaic rather than a paddock. It is this type of free movement which permits the disturbance at the heart of the horses' ecological function. Lifting the farm infrastructure duties strips out obligations premised on housed, intensively managed stock that make no sense for animals living out in natural pasture.

The regime stops treating the herd as production or livestock long enough for it to behave and function as a wild grazer. In addition, it represents significant savings on the financial burden that managing herds, according to the conventional framework, carries.

Two lessons are worth carrying forward:

- First, on resistance. Legally, the wild or semi-wild regime is not optional for the region. It rests on binding rules – EU requirements given effect through State legislation that applies across Spain – so a region must apply the regime even where its own regulations are silent on the category. Silence is not a lawful ground for refusal. In practice, though, this is where practitioners can expect friction: the recognition here was initially met with reluctance precisely because the regional rules did not mention the exemption. That refusal had no legal basis, but it was a real obstacle on the ground. The way through was to anchor the request in the binding State-wide regime. As practical reinforcement, practitioners can point to other regions that already recognise such areas.
- Second, on scope. The regime is a lighter status within equine law, so the obligations snap back if those conditions cease to exist. Practitioners should map the conditions carefully against how their particular herd is actually managed.

Replicating the equine route

This is a tool other that organisations can use, and the most replicable part of our in the Iberian Highlands. The semi-wild equine status is not a Spanish peculiarity: it gives effect to an EU scheme, so equivalent derogations for defined wild or semi-wild equine populations exist across EU member states. The core argument, that the regime is directly applicable State/EU law a regional authority must apply, even where its own rules are silent, should transfer well beyond this case.

The checklist below explains the key steps that should be followed to achieve legal recognition of a defined population of horses as a wild or semi-wild equine holding.

CHECKLIST

1. **Confirm the animals genuinely live in wild or semi-wild conditions:** the horses should be effectively separated from domestic use, and not dependent on human control for survival and reproduction. This is the condition the whole regime turns on; if it is not met, the route does not apply.
2. **Check whether the holding is equine only or mixed.** The status is an equine category. If cattle share the ground, the cattle remain under cattle rules (see “What current law can't yet do”).
3. **Start from existing REGA registration.** The horses will already be registered as a livestock holding. The request changes that holding's category, it does not create a new one.
4. **Apply to the regional livestock authority** to change the holding to the wild or semi-wild equine category.

5. **Anchor the request in State and EU law:** the regime derives from State regulation applicable across Spain and gives effect to an EU scheme, meaning that regions are under an obligation to give effect to it. Cite other regions that already recognise such areas. Practitioners should be aware that, even with anchoring the request in State and EU law, a refusal may be possible based on regional regulations.

6. **On recognition, treat the area formally as a wild or semi-wild horse area** and make sure the recognition is reported up the chain: the region notifies the central government, which, as the member state, then informs the EU Commission of the defined area.

7. **Maintain the conditions.** The relief is temporary. If animals are brought into domestic use or human control, the default regime applies again.

8. **On timing:** plan for a multi-stage effort, not a quick administrative change. Rewilding Spain's process ran through 20 months, from first steps in September 2024 to recognition by the regional government in May 2026. It will take longer until the process is finished, when the recognition is reported to the competent central authority, which, as the member state, keeps the EU Commission and the public informed of the defined area.

What the current law can't do

We are continuing to explore three other routes to achieving a wild-living status for Rewilding Spain's large herbivores. Together they mark the edge of what current law can do, and they are where the next practical progress, or the case for reform, will be made.

Mixed holdings of horses and cattle

In natural conditions, different species share the same territory. If rewilding initiatives want to restore natural processes, it is important that horses and cattle are able to co-exist in the same areas with both species living in a wild or semi-wild manner.

The semi-wild status secured so far is only available for horses, and the law does not contemplate a joint declaration for a holding that also contains cattle. A practical frontier remains where a single holding covers both equines and bovines on the same REGA. The wild or semi-wild regime is, by its terms, an equine category, and the current rules do not provide for a joint declaration that would extend wild or semi-wild status to the cattle on a mixed holding. This leaves a genuine gap: a project running horses and cattle together over the same ground cannot simply place the whole holding under the same wild or semi-wild regime. The question is still being worked through, including through engagement with authorities. Whichever route is taken, resolving it would break new ground as there is, as yet, no established practice in Spain for this.

Behind this issue sits the deeper gap: even once the horses get their wild or semi-wild status, there is still no equivalent wild or semi-wild regime for cattle, which keeps the full cattle rulebook (identification and ear-tagging, tuberculosis testing, movement controls) in place, even though they live exactly as the horses do. To fix this would require the kind of function-based status discussed below. A status which is defined by how animals live, rather than by species-specific categories, would avoid precisely this kind of impasse.



Daniel Allen/Rewilding Europe

Tauros – a dedicated regime based on ecological function

Tauros are the hardest case because they are classified legally as cattle and lack a distinct legal identity, despite having been bred to be as close as possible to the extinct auroch and, therefore, displaying many “wilder” characteristics compared to more traditional breeds of domestic cattle. As production animals, they have to comply with an intrusive legal regime involving registration, defined areas, identification, movement controls, and regular health checks. These requirements work against free-ranging animals.

There are very few derogations for cattle, and both Spanish and regional rules are anchored in EU regulation, so the room for manoeuvre under current law is limited.

As a first step, Tauros (and other cattle used in natural grazing) should be held under a grazing REGA (REGA de pastos) rather than the standard production registration. This allows freer movement over larger areas, though even that requires significant human intervention.

We propose going further by creating a dedicated regime based not on breeds, but on ecological function. Tauros are the perfect example of such bovines, not because of how closely they resemble aurochs, but on the specific ecological function they perform as grazers. It would also draw on the existing special regime for bullfighting bulls (toros de lidia) as evidence that Spanish law can create a bespoke regime for a defined category of cattle.

Working with the lawyers on the legal avenues, we identified three legislative routes to such a regime:

- **A national popular legislative initiative**, which lets citizens put a draft law before the Congreso de los Diputados. However, the bar is high: at least 500,000 authenticated signatures from registered voters, collected within nine months (extendable by three) is needed, after which Congress is only obliged to take the proposal into consideration, not to enact it.
- **A regional initiative in Castilla-La Mancha**, before the Cortes de Castilla-La Mancha. The procedure bar is far lower: at least 20,000 authenticated signatures from registered voters, collected within three months, is required. Or as an alternative, the initiative could be started by six or more town councils, voting by absolute majority and together representing at least 20,000 electors, who can themselves introduce a bill. The real issue though is that an amendment to the regional legislation will have limited impact because it cannot contradict what is required at State or EU level, which is where many of the restrictions applicable to cattle stem from.
- **Engaging political parties** to promote a change of Law 42/2007 of 13 December 2007 on Natural Heritage and Biodiversity. Because this is Spain's core biodiversity law, it may be the most appropriate place to explore a change in status for equines and bovines performing solely ecological functions. This could open the door to a clearer, function-based category, allowing animal health and welfare controls to be adapted to natural grazing rather than applied as if they were conventional livestock.

In order to progress this, we would need to build the scientific evidence on the impact of bovines in the health of ecosystems when they are allowed to roam free and according to their natural role. Tauros are particularly suitable for this role. We would also need to start engaging with various autonomous regions to try and secure their support and to engage with stakeholders to understand their views on this approach. Establishing this more tailored regime would require further administrative and legislative work and it would require national-level engagement before it could be relied on.

European Bison: a conservation centre (núcleo zoológico)

European bison sit more favourably within legislation than Tauros. Although they may still be handled under livestock rules and considered as non-native in Spain, European bison are recognised under EU nature law as a species of community interest and as a wild species. This distinguishes them from ordinary cattle, including Tauros, and makes it possible to frame their management around ex situ conservation, breeding, and research rather than solely as livestock management.

Rewilding Spain has translocated a group of nine European bison which are grazing across 400 hectares in Castilla la Mancha. In practice, the animals are handled as livestock, which entails significant handling, monitoring, and sanitary controls. To allow management conditions closer to the species' wild behaviour and social structure, we are exploring authorisation as a conservation-centre (núcleo zoológico) for the conservation, breeding, and scientific study of a wild species. As núcleos zoológicos are a recognised category under Castilla-La Mancha law, the proposal would place the animals within an existing regulatory framework rather than to seek a novel legal status. That framework is time-limited, however. It runs as a scientific or research project (authorised for five years, renewable for a further five) within which the animals hold conservation-centre status, rather than a permanent status of their own. Even where it works, it secures a fixed, reviewable term, not a settled legal status for the herd.

Our position is that this framework could allow the competent authorities to consider adaptations or exemptions from certain bovine-health requirements, where justified by the conservation and research objectives of the project. This is an emerging but already-precedented pathway as another Spanish region granted a comparable conservation-centre authorisation for European bison several years ago, on the basis of the species' protected status and with the backing of recognised bison-conservation bodies. That precedent shows the route can work, but it also shows its limitations: such authorisations are granted on a case-by-case basis and subject to review.

They also come with substantial conditions including continuous monitoring and reporting, genetic-purity and disease-testing requirements, containment and escape-prevention obligations, measures to protect surrounding protected species and habitats, and restrictions on public access.

The conservation-centre route is therefore a credible pathway for European bison and a possible reference point for Tauros. However, the legal significance lies less in the creation of a new status than in the use of an existing conservation-centre framework for conservation and research purposes. Whether this ultimately results in departures from ordinary management of livestock requirements will depend on the specific authorisation granted and the conditions imposed by the competent authorities. Because discussions with the competent authorities are ongoing and some aspects remain confidential, only a high-level overview of the approach is provided here.

The bigger picture: why this will ultimately need legal change

A new legal category?

Everything above works within the existing system: derogations, special categories, case-by-case authorisations. That approach has real limits. Our work in Iberian Highlands shows that meaningful progress is possible under current law, but relief is granted species by species and authority by authority. It must be re-established each time and, even at its best, it operates within the livestock framework rather than offering an exit from it. Recognised herds of semi-wild horses remain on livestock holdings, just under lighter rules. Existing derogations can take rewilding only so far.

One particular issue, which isn't easily addressed by current exemptions and derogations, is that of carcasses. Carcasses feed scavengers and return nutrients to the system, yet the default rules require fallen stock to be collected and destroyed. Although we haven't explored it as part of this project to date, Spain permits a separate derogation that lets extensive livestock holdings inside a designated protection zone leave carcasses in situ for necrophagous species.

A free-ranging herd would be eligible to seek that authorisation, but only where its area is a designated zone and subject to a separate authorisation and detailed rules requiring carcasses to be recorded. This is a clear illustration of the central issue pointing towards the need for a new overarching legal category: certain relief exists, but as a patchwork of separate, conditional authorisations that no single status yet ties together. More broadly, this is an issue that the Lifescape Project is considering across multiple UK and European jurisdictions including those where even this type of derogation is not available, making the case for a new legal category even more important. You can read, for example, about our work in the UK to explore possibilities to leave carcasses on site.

Fully realising the ecological benefit of wild-living large herbivores being used as ecological proxies for their extinct ancestors will ultimately require a more fundamental change and a durable legal status of their own.

What this new category should be is not yet settled, and this note does not pretend otherwise. Further research is required. However, the unifying idea is some sort of "kept wild" status: a recognition that animals living in genuinely wild or semi-wild conditions should carry a specific and proportionate regime rather than the full farm regime. Such status would be defined by how the animals live and what they do, i.e. their ecological function, rather than by species. In principle, this could capture all issues at once: giving Tauros the legal identity they lack, formalising the equine flexibility that now depends on convincing the decision-maker and expanding it to cattle, and generalising the conservation rationale European bison already attract.

The questions such a status would have to answer are exactly what still needs working out:

- **Whether some animals should instead be recognised as wild.** A "kept wild" category would apply to animals still subject to some degree of human control over them. The question is whether this should be the case or whether the animals should instead be recognised as fully wild. This is a fundamental issue to be addressed because many of the animals that would fall into this category are non-wild species that are being used as ecological proxies for their now-extinct wild ancestors. This complicated ecological reality does not exist for all large herbivore species including, for example, the European bison which in many European countries is a native wild species. Such recognition does not yet exist in Spain, which complicates matters, but in the long run that recognition may be the ultimate goal.

- **What a proportionate health regime looks like.** There may still be a need to compromise and consider health considerations, so a lighter regime does not necessarily mean an unmanaged one. This could include issues such as monitoring, risk assessment, the ability to suspend an initiative, and the treatment of fallen stock and carcasses.
- **How to define an "ecological replacement" by function, in terms the law can apply.** Ecological guidance¹ already recognises the concept of animals being an "ecological replacement" where they are defined by the function they perform, not just how closely they resemble the extinct species that historically performed that function. The difficulty is legal: under Spanish law, categories of animals turn on what an animal is (species, breed, registration), not the role it plays, so a durable status would need a workable test for when an animal qualifies by function.
- **How such a status would sit with the rules on non-native species.** A functional substitute may be non-native by design, meaning that should those animals be released into the wild, the rules on introducing non-native species would be engaged. Under current rules, the release of non-native animals into the wild is strictly controlled and are only sometimes possible as an exemption. A "kept wild" regime would therefore have to operate as an authorised exception, and a special regime would need to apply.

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The policy window: the Nature Restoration Regulation and the National Restoration Plan

The EU Nature Restoration Regulation (Regulation (EU) 2024/1991), in force since August 2024, requires Member States to restore degraded ecosystems towards good ecological status defined by functional integrity, an objective that, on the Regulation's own terms, cannot be met by restoring physical habitat alone. Its indicative restoration measures expressly contemplate allowing ecosystems to develop their own natural dynamics, which encompasses the recovery of herbivores and trophic chains. The Regulation, therefore, already supplies the legal rationale for recognising reintroduced large herbivores (native and functional substitutes alike) as restoration measures rather than mere livestock.

All Member States must prepare a National Restoration Plan, and this represents an important vehicle for these reforms. Spain's plan which is currently being prepared, coordinated by the Ministry for Ecological Transition, is built on existing national strategies and a public participation process is under way. Rewilding Spain is actively engaged in that process. The draft is due to the European Commission around September 2026. Because the plan must identify concrete measures by ecosystem type, it is a natural place to name rewilding through large herbivores as a restoration measure for grassland and forest ecosystems, and to catalyse the legal changes above. The plan cannot by itself amend laws, but it can establish the policy basis and the momentum for doing so.

There is a wider reason this work matters. Spain's public consultation on the National Restoration Plan revealed a blind spot: citizens consistently ranked farmed landscapes near the bottom of their restoration priorities. The Ministry's own reading is that people associate "nature restoration" with rivers, forests, and coasts, and see agricultural land more as productive space rather than an ecosystem in its own right, even though farmed land is the largest surface in Spain and a central target of the EU framework, which the consultation flags as a communication challenge the Plan must address.

This is precisely the gap that large herbivores and rewilding can help close. The public lens on livestock tends to be framed around intensive farming: indeed, where intensive farming is most visible, citizens are more likely to see it as a cause of degradation. Free ranging, natural grazing is a different thing altogether: extensively managed herbivores are not a productive burden on a landscape but an active restoration mechanism. Making that distinction, between intensive production and natural grazing, reframes grazing animals and the landscapes they shape as living infrastructure for ecological restoration, and a concrete, relatable example with which to address the very visibility gap the consultation identified.

Because the National Restoration Plan is being prepared now, its status and content may change – the latest status will be recorded in Ministry's published materials ([Ministry page on the National Restoration Plan](#)).

KEY LESSONS

This case study points to several lessons for rewilding with large herbivores, in Spain and in comparable European systems:

- **Administrative precedent already exists.** Wild or semi-wild status for horses and a conservation-centre route for European bison shows that current law can go a long way to accommodating free ranging herds for some species, and that institutional willingness to move forward is present.
- **Species need different routes.** Equines have the clearest pathway; European bison have an emerging, precedented route; Tauros and other cattle are the hardest because they lack a distinct legal identity and sit squarely within livestock law.
- **Progress currently depends on administrative discretion.** Much of what has been achieved rests on authority interpretation and case-by-case decisions, which is workable but fragile and must be re-established each time.

- **The best current route still does not remove the label.** Even herds of horses recognised under the semi-wild regime remain on livestock holdings. This demonstrates the importance of a new legal category, and a limit of working through the derogations alone.
- **There is a policy window now.** The preparation of Spain's National Restoration Plan, under the EU Nature Restoration Regulation, is a timely opportunity to recognise rewilding with large herbivores as a restoration measure and to start the processes of achieving the necessary legal changes.
- **Dead ends are data.** The routes that were set aside are as instructive for others as the successes.

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GET IN TOUCH IF YOU FIND SIMILAR ISSUES

If you are working with large herbivores and rewilding or you are running into the same obstacles in your jurisdiction, the Lifescape Project would like to hear from you. We're glad to share what we've learned and to learn from your experience.

Get in touch at stephanie.smith@lifescapeproject.org.

(Managing Lawyer- Rewilding Law)

or catarina.prata@lifescapeproject.org

(Senior Rewilding Lawyer)