

## OPEN LETTER

### Switzerland's December 2023 - January 2024 wolf cull

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#### To Federal Counsellor Albert Rösti and the Standing Committee of the Bern Convention

**28th November 2023** - We, the undersigned, are extremely concerned about the upcoming cull which would allow Switzerland to reduce Swiss wolf numbers by up to 70%, as well as by the recent amendment to Switzerland's national legislation that undermines wolf protection and provides a legal framework for cantons to extirpate entire packs down to a set quota on a preventative basis, regardless of whether or not they have caused serious damage to livestock or threatened humans.<sup>1,2</sup>

These radical, unilateral measures don't just threaten Switzerland's fragile wolf population, they negatively impact the entire Western-Central Alps wolf population. The Convention's preamble specifically mentions the twin threats of species depletion and extinction.<sup>3</sup> As an apex predator and keystone species, the wolf contributes to a richer animal and plant life. Preventative measures, such as electric fences and guardian dogs, are effective at reducing livestock predation and should be more widely implemented. There are better ways to coexist with this keystone species than random, large-scale killing and culling.<sup>4</sup>

#### **Background**

Native to Switzerland, the Grey wolf (*Canis lupus*) was hunted to extinction in the late 19th century, with the last individual shot in the Ticino in 1872. In the mid 1990s, wolves began to naturally recolonise parts of the country from Italy, with the first and arguably the most famous pack forming in 2012 in the Calanda region of the Canton of Grisons. Wolves have since been documented in 20 cantons, mostly in the Alps, but also in the Jura. The wolf has been protected since 1986 under the Federal Hunting Law.<sup>5</sup>

The Federal Office for the Environment (FOEN) put the number of Swiss wolves at 250 "mature individuals" in 2022.<sup>6</sup> KORA, which monitors large predator populations on behalf of the Confederation, estimates there are currently 8 pairs of wolves and 31 packs, 9 of which are transboundary packs shared with France and Italy. Switzerland provides very suitable wolf habitats and half the country could theoretically sustain 50-100 packs.<sup>8</sup> Swiss wolves form part of the larger Western-Central Alps population whose numbers are also increasing. Indeed, France and Italy's growing populations were the reason given by FOEN for the recent re-classification of the wolf from Endangered (EN) to Vulnerable (VU), despite the fact that a population of 250 should be classified as Endangered, based on the D classification criteria.<sup>9</sup>

Swiss wolves continue to face significant threats from legal and illegal killing, collisions with road vehicles and trains, and their small, fragmented populations. This winter's cull and the recently

amended legislation underpinning it would allow Switzerland to reduce the population by up to 70% and pack numbers to 12,<sup>10</sup> threatening not just the species' survival in Switzerland, but also potentially impacting the wider Western-Central Alps population. The cantonal wolf kill quotas would allow packs to be reduced to below the 17 packs, required to ensure a "minimum viable population" for Swiss wolves as part of the larger Alpine population.<sup>11</sup>

The new legislation divides Switzerland into 5 regions<sup>12</sup> and would allow pack numbers to be reduced to 3 each in the two designated "large regions", namely the "western Alps" which includes the Valais — the most important route taken by transient wolves from France and Italy — and the "southeast" which encompasses the Grisons. The Canton of Valais has already dispatched invitations for hunters to select the pack they wish to target and has announced that it wants to kill 34 wolves and eliminate 7 of its packs.

### **International Conventions matter**

Switzerland ratified the Bern Convention in 1981. The Convention's aim is to "conserve wild flora and fauna and their natural habitats, especially those species and habitats whose conservation requires the co-operation of several States, and to promote such cooperation" giving particular emphasis to "endangered and vulnerable species".<sup>13</sup> The wolf is listed in Annex II as a "strictly protected fauna species" which can only be regulated to "prevent serious damage" to livestock provided that there is "no other satisfactory solution" and that the measures will "not be detrimental to the survival of the population concerned" (Article 9).<sup>14</sup>

Switzerland is also a Party to the Alpine Convention,<sup>15</sup> the first international treaty aiming to protect an entire mountain range through cooperation between eight Alpine nations and the EU, one of whose objectives is to "preserve Alpine fauna and flora, including their habitats". The Convention also recognises that "the Alps constitute an essential habitat and last refuge for many endangered species", and that, as such, countries share a responsibility for maintaining populations, including of large carnivores, by avoiding "black holes" and promoting a network of sub-population connectivity.<sup>16</sup>

A Convention signed in 2006 between France, Italy and Switzerland 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,<sup>17</sup> making it all the more important to implement conservation and management measures that are both coordinated and consistent.

As a Contracting Party, Switzerland is bound to uphold the aims and Articles of all these Conventions. Instead it has repeatedly and increasingly sought to weaken the wolf's protection at both the European and national levels, culminating in this winter's cull. By its unilateral actions, Switzerland isn't just threatening the survival of its own already fragile wolf population, it is in effect outsourcing the responsibility of wolf conservation to its neighbours.

### **Facts matter**

Proponents of the cull have painted the wolf as a blood-thirsty predator that wantonly kills livestock and poses a threat to humans ("cattle today, children tomorrow"<sup>18</sup>), but KORA hasn't recorded a single "intrusive" or aggressive wolf in Switzerland since the species' natural recolonisation in 1995<sup>19</sup> and the Swiss wolf Management Plan already allows for wolves that develop "problematic" behaviour towards humans to be shot.<sup>20</sup>

Conflicts do arise from attacks on livestock that target mostly sheep (over 90%), some goats (6-8%), and only rarely cattle, horses and camelids. However most attacks involve herds left unprotected on summer pastures. Large carnivores, mostly wolves, account for just 6% of sheep mortality during summer grazing on Swiss mountain pastures. Disease and accidents are responsible for most livestock deaths.<sup>21</sup>

Switzerland has long and fully exploited the flexibility of Article 9 of the Bern Convention to remove stock-raiding wolves that cause “serious damage”, and far more wolves have been legally shot (54 individuals, i.e. 42%) than have died in traffic collisions (38) or been poached (11) in the last 25 years<sup>22</sup>. There is therefore no need for a downlisting of the wolf’s protected status nor a need for the cull.

### **Science matters**

The supposed aim of this winter’s cull is to reduce livestock predation and, in the words of the Federal Council, to “make the wolf fearful again”<sup>23</sup>. However less wolves don’t necessarily mean less damage which, in Switzerland, is subject to numerous variables such as farm structures, livestock protection measures, prey density and traditional husbandry practices.<sup>24</sup> Livestock predation can actually increase after a wolf cull,<sup>25</sup> possibly due to impacts on demographic, territorial, and social structure of wolf populations. This can in turn lead to higher reproduction rates and possible changes in animal behaviour, including hunting habits thereby risking defeating the cull’s supposed purpose. A 2020 study showed that “lethal control and translocation were less effective than other measures” such as ropes hung with coloured flags (visual warning) and guardian dogs, at reducing livestock predation.<sup>26</sup>

Indeed, preventative measures such as guardian dogs, electric fences and human presence have proved remarkably successful at reducing wolf damage in Switzerland, as testified by OPPAL,<sup>27</sup> an organisation which aims to improve cohabitation between human activities and large carnivores. The number of livestock killed by wolves in Switzerland in 2023 decreased by 29% compared to the previous year (850 vs 1,200), despite an increase in wolf numbers.

Regulating the wolf population is unlikely to prevent livestock kills as long as herd protection remains inadequate, and legalising and condoning the killing of protected species has been shown to increase the risk of poaching.<sup>29</sup> Moreover, the anti-wolf rhetoric underpinning the cull doesn’t just risk undermining support for wolves, it also seriously subverts the role of science in their management.

### **Public opinion matters**

According to a 2019 survey by Pro Natura,<sup>30</sup> Switzerland’s oldest nature conservation organisation, 79% of Swiss people do not want wolves killed when farmers fail to protect their livestock. Electric/solar fences have shown particular promise. They are expensive, but subsidies are available. The FOEN has set aside CHF 3.7 million for livestock protection measures.<sup>31</sup> Today, sheep and goat farming in hilly and mountainous regions is threatened by globalisation and is no longer profitable, so it is often only practised as a side-line occupation. Many farmers refuse to use deterrents, and so the predation continues. The wolf is made a scapegoat in a debate that is symbolic of wider societal divisions such as the urban vs rural split or right vs left-wing politics. Switzerland’s high socio-economic standard is inversely proportional to its tolerance for wolf-livestock conflicts.

However, in 2020, the Swiss public voted in a national referendum against an amendment to the law which would have made it easier to kill wolves. Two years later, undeterred by the public vote, parliament passed a new version of the 2020 law that had been rejected by the electorate. It provides the latest legal framework to set canton-level wolf quotas to regulate entire packs “proactively” instead of “reactively” as of 1 December 2023.

The recent amendment to the Ordinance (OChP) which legalises the upcoming cull,<sup>32</sup> marks the culmination of over 60 motions in parliament and 17 years attempting to weaken the wolf’s protection on both the European and national stages. Moreover it came into force on 1st November without a legal and proper consultation process.

The cull is not science-based and has everything to do with political grandstanding and vilification. It risks further polarisation and further inflaming tensions.

### **Nature matters**

We are currently experiencing a mass extinction of species. The wolf plays a vital role in maintaining the balance of ecosystems and its return to Switzerland is a rare success story in a country with some of the highest percentages of threatened species in the OECD.<sup>33</sup>

Decades of progress could be undone this winter and beyond.

### **Signatories**

1. AAE-Association animal équité, Switzerland
2. Aktionsgemeinschaft Schweizer Tierversuchsgegner, Switzerland
3. Aletra Communications Sagl, Switzerland
4. Animal Rights Switzerland
5. Association Middleway, Switzerland
6. Avenir Loup Lynx Jura, Switzerland
7. Berner Tierschutz, Switzerland
8. David Bittner, Switzerland
9. Fair Carbon, Switzerland
10. Fondation Segré, Switzerland
11. Fondation SOS Chats Noirraigue, Switzerland
12. GEONOX GmbH, Switzerland
13. Gruppe Wolf Schweiz, Switzerland
14. Himalayan Wolves Project Switzerland
15. IG Pro Mittellandwald, Switzerland
16. IG Berner Wald, Switzerland
17. IG Wild beim Wild, Switzerland
18. Naturfreunde Schweiz, Switzerland
19. PETA Schweiz, Switzerland
20. ppp-movement, Switzerland
21. Pro Natura, Switzerland
22. Society for the Protection of Wolves (SPW), Switzerland
23. Stream Foundation, Switzerland

24. Schweizer Tierschutz STS, Switzerland
25. Stiftung für das Tier im Recht (TIR), Switzerland
26. Verein CHWOLF, Switzerland
27. Waldexkursionen, Switzerland
28. Wolfs-Hirten, Switzerland
29. Zoologische Gesellschaft Zürich, Switzerland
30. Zürcher Tierschutz, Switzerland
31. Ecoflix, International
32. Foundation Conservation Carpathia, International
33. Global Rewilding Alliance, International
34. International Conservation & Biodiversity Team (ICBT)
35. International Fund for Animal Welfare (IFAW)
36. IUCN SSC Canid Specialist Group, International
37. Save the Earth international, International
38. Eurogroup for Animals, Europe
39. European Wilderness Society, Europe
40. EuroNatur, Europe
41. European Young Rewilders, Europe
42. Humane Society International/Europe, European Union
43. Terra 1530, Europe
44. The European Nature Trust, Europe
45. Wild Europe Foundation, Europe
46. Amigos do Protocolo de Kyoto, South America
47. Naturschutzbund Österreich, Austria
48. Biomass Action Group, Australia
49. Environment East Gippsland Inc., Victoria, Australia
50. First Friends of Dandenong Creek, Australia
51. Wilderness Australia
52. The Wolf Conservation Association, Belgium
53. BALKANI Wildlife Society, Bulgaria
54. Mountains and People Association of Bulgarian Mountain Leaders and Mountain Guides, Bulgaria
55. Nature Nova Scotia, Canada
56. Wilderness Committee, Canada
57. Green Squad, Croatia
58. Hnutí DUHA - Friends of the Earth Czech Republic
59. Institute of Vertebrate Biology CAS Brno, Czech Republic
60. Aube Nouvelle pour la Femme et le Développement (ANFD), Democratic Republic of Congo
61. Groupe Academia RDC, Democratic Republic of Congo
62. Danmarks Vilde Natur, Denmark
63. Endelave Natur og Miljø, Denmark
64. Foreningen Danmarks Vilde Natur, Denmark
65. Min egen, Denmark

66. Thomas Læssøe, Denmark
67. Tina Ljung, Denmark
68. Ulvetid, Denmark
69. Vild i Vejen, Denmark
70. VILD MED VILJE, Denmark
71. MTÜ Loomus, Estonia
72. Save Estonia's Forests, Estonia
73. Luontoliiton susiryhmä / The Wolf Action Group, Finland
74. Animal Cross, France
75. Association Le Klan du Loup, France
76. Association Protection des Animaux Sauvages (ASPAS), France
77. ASPA Vosges, France
78. AVES France
79. Baleine Sous Gravillon, France
80. Boules Epiques, France
81. Bretagne Vivante, France
82. CAP loup, France
83. Crow Life, France
84. Ecodomaine La Forestrie, France
85. Education Ethique Animale, France
86. FERUS (Ours-Loup-Lynx Conservation), France
87. France Nature Environnement
88. FNE AURA, Auvergne-Rhône-Alpes, France
89. Focale pour le Sauvage, France
90. Fondation Brigitte Bardot, France
91. HUMANIMO, France
92. Ligue pour la Protection des Oiseaux (LPO), France
93. One Voice, France
94. PÔLE GRANDS PREDATEURS, France
95. SFEPM - Société Française pour l'Etude et la Protection des Mammifères, France
96. Société Nationale de Protection de la Nature (SNPN), France
97. Wildya, France
98. Yasmina Haroune, France
99. BUND Hessen, Germany
100. BUND Naturschutz in Bayern e.V., Germany
101. Centre for Economics and Ecosystem Management, Germany
102. Deutscher Tierschutzbund e.V., Germany
103. Forum Ökologie & Papier, Germany
104. Pro Wildlife, Germany
105. ROBIN WOOD, Germany
106. Wohllebens Waldakademie, Germany
107. AbibiNsroma Foundation, Ghana
108. Free World Foundation, Ghana
109. ARCHELON, Greece

110. CALLISTO, Wildlife and Nature Conservation Society, Greece
111. Hellenic Ornithological Society/BirdLife Greece
112. Hellenic Society for the Protection of Nature (HSPN), Greece
113. iSea, Environmental Organisation for the preservation of the aquatic ecosystems,  
Greece
114. Mamagea Environmental Organisation, Greece
115. Society for the Protection of Biodiversity Thrace
116. Association For Promotion Sustainable Development, India
117. Koarp, Iraq
118. Compassionate Conservation Middle East, Israel
119. Eliante, Italy
120. Green Impact, Italy
121. Io non ho paura del lupo APS, Italy
122. The great daughter GREDA, Kenya
123. Animal Rights Association B.and T., Latvia
124. Inese Lukšo, Latvia
125. Jelena MirnajA, Latvia
126. Kemer National Park Fund, Latvia
127. Latvijas ainavas / wildlife conservation NGO, Latvia
128. Puse Latvijas, Latvia
129. Riga Animal Save, Latvia
130. Sofi Charity Foundation, Latvia
131. Zootēka, Latvia
132. Comité Schone Lucht, Netherlands
133. Leefmilieu, Netherlands
134. Rewilding Academy, Netherlands
135. Rewilding Europe, Netherlands
136. Scientists 4 Future - Wageningen, Netherlands
137. Maxbio Glow, Norway
138. NOAH - for animal rights, Norway
139. Community Initiatives for Development in Pakistan-CIDP, Pakistan
140. Mission Awareness Foundation, Pakistan
141. Teraz Lasy, Poland
142. CIÊNCIA NATURA, Portugal
143. Plataforma Lobo-ibérico em Portugal
144. Agent Green, Romania
145. Association 2Celsius, Romania
146. CETM Albamont, Romania
147. Earth Thrive, Serbia
148. Aegis Foundation, Slovakia
149. PRALES, Slovakia
150. WOLF Forest Protection Movement, Slovakia
151. Animal Angels Slovenja, Slovenia

152. Dinaricum Society - Society for Conservation and Sustainable Development of the Dinarics, Slovenia
153. Društvo za zaščito živali Novo mesto, Slovenia
154. LAJKA, Society for the Protection of Animals, Slovenia
155. Mačje tačke, Slovenia
156. Society for the Protection of Animals Ljubjana, Slovenia
157. Terra Anima, Society for Deep Ecology, Slovenia
158. Eden to Addo Corridor Initiative, South Africa
159. Arbórea, Spain
160. Grupo Lobo Andalucia, Spain
161. Colla Ecologista l'Arrel, Spain
162. Lobo Park, Asociación, Spain
163. Voluntariado Censo Lobo en la Peninsula Iberica, Spain
164. BirdLife Sweden
165. Djurskyddet Sverige (Animal Protection Sweden)
166. Naturögat, Sweden
167. Stora Rovdjursgruppen, Sweden
168. Tanzania Climate Change Initiative, Tanzania
169. African Conservation Foundation, UK
170. Conservative Environment Network, UK
171. Ecoflix, UK
172. International Otter Survival Fund, UK
173. Knepp Wildland, UK
174. i-nature, UK
175. Tasting Freedom, UK
176. Westacre Woodland Management , UK
177. Wildland Research Institute, UK
178. Wildlife Network for Disease Surveillance, UK
179. Biofuelwatch, UK/USA
180. Angel Creek Forest Preserve, USA
181. Coastal Plain Conservation Group, USA
182. Earth Action, Inc., USA
183. Global Justice Ecology Project, USA
184. In Defense of Animals, USA
185. The ReWilding Institute, USA
186. Wild Heritage, USA/France



 <p>LUONTOLIITTO SUSIRYHMÄ</p>	 <p><b>GWS</b> www.gruppe-wolf.ch</p>	 <p>pro natura</p>
 <p>lo non ho paura del lupo</p>	 <p>biofuelwatch</p>	 <p>RIGA ANIMAL SAVE ANIMAL SAVE MOVEMENT</p>
 <p><b>GJEP</b> GLOBAL JUSTICE ECOLOGY PROJECT</p>	 <p>ZOOTĚKA</p>	 <p><b>EARTH ACTION</b> because the earth is not for sale</p>
 <p>SAVE ESTONIA'S FORESTS</p>	 <p>KG BERNER WALD</p>	 <p>WILD EUROPE</p>
 <p>Coastal Plain Conservation Group</p>	 <p>WILDBERITAGE</p>	 <p>PUSE LATVIJAS</p>







		
		
		
		
		
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 <p>FRANCE NATURE ENVIRONNEMENT</p>	 <p><b>FERUS</b> Ours-Loup-Lynx Conservation <a href="http://www.ferus.org">www.ferus.org</a></p>	 <p><b>SFEM</b> SOCIÉTÉ FRANÇAISE POUR L'ÉTUDE ET LA PROTECTION DES MAMMIFÈRES</p>
 <p><b>LPO</b> BIRDLIFE FRANCE</p> <p>Agir pour la biodiversité</p>	 <p>Centre for Ecnics and Ecosystem Management</p>	 <p><b>HUMANIMO</b> Être sensible</p>
<p><b>NOAH</b>   for dyrs rettigheter</p>	<p><b>euRONATUR</b></p>	 <p>TERRA ANIMA Društvo za poglobljeno ekologijo</p>

 <p>Canid Specialist Group</p>  <p>Part of IUCN</p>  <p>Species Survival Commission</p>	 <p>FOCALE pour le Sauvage</p>	 <p>ECODOMAINE</p>  <p>LA FORESTRIE</p>
 <p>CROW LIFE</p>	 <p>LOOMUS LOOMADE NIMEL</p>	 <p>WILD WILD</p>
 <p>SPW</p>	 <p>Wilderness Australia</p>	 <p>ESOGHRAVÁRSKE ZOSKUPENIE</p>
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 <p>AAE</p>	 <p>PETA SCHWEIZ</p>	 <p>FONDATION SEGRÉ</p>
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<p><b>STIFTUNG   FÜR DAS TIER IM RECHT</b></p>	<p><b>Animal Rights</b> Switzerland</p>	
 <p><b>INSTITUTE OF VERTEBRATE BIOLOGY</b> CZECH ACADEMY OF SCIENCES</p>	 <p><b>Bretagne Vivante</b> <i>Une voix pour la nature</i></p>	 <p><b>KNEPP</b> CASTLE ESTATE</p>
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 <p><b>SNPN</b> SOCIÉTÉ NATIONALE DE PROTECTION DE LA NATURE PROTÈGE LA NATURE DEPUIS 1854</p>	 <p>www.wwf-movement.org</p>	<p><b>GREEN SQUAD</b></p>
 <p><b>Himalayan Wolves</b> PROJECT</p>	 <p><b>DAVID BITTNER</b></p>	 <p><b>Save the Earth</b></p>



		
		
		
		
		

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 <p>WE ARE THE STRIVERS</p>	 <p>DINARICUM</p>	 <p>Callisto Wildlife and Nature Conservation Society</p>
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	 <p>BERNER TIERSCHUTZ</p>	 <p>Earth Thrive NATURE RIGHTS www.earth-thrive.org</p>

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