



STICHTING Het Nationale park
De Hoge Veluwe

European Commission
For the attention of the President of the European Commission
Mrs. Ursula von der Leyen

By e-mail: EC-WOLF-DATA-COLLECTION@ec.europa.eu

datum:	ONS kenmerk:	ONDERWERP:
21 september 2023	181242	Wolf data collection by the European Commission

Dear President,

On the 4th of September 2023, the European Commission published a press release with the title: "*Wolves in Europe: Commission urges local authorities to make full use of existing derogations and collect data for conservation status review*". The press release announces that the European Commission is launching a new phase in its work on addressing the challenges related to the return of wolves. For this reason, the Commission is inviting local communities, scientists and all interested parties to submit up-to-date data by 22 September 2023 on wolf populations and their impacts. They are invited to use the following email address: EC-WOLF-DATA-COLLECTION@ec.europa.eu.

We, Dutch independent foundation *Stichting Het Nationale Park De Hoge Veluwe*¹ (the 'Foundation'), would like to take advantage of this opportunity to respond. The Foundation is the private owner and manager of the Hoge Veluwe National Park (the 'Park'), in the province of Gelderland near the cities of Ede, Wageningen, Arnhem and Apeldoorn in the Netherlands. The Park comprises 5,400 hectares of woods, grass lands, inland dunes, sand heaths and peat bogs and is fenced entirely. The Park's different landscapes are home to a wide and unique variety of plant and animal species.

Not only conflicts with livestock, local farming communities and hunting communities, the wolf also has detrimental effect on protected natural habitats and species

¹ Stichting Het Nationale Park De Hoge Veluwe, having its registered office and principal place of business at Apeldoornseweg 250, (7351TA) in Hoenderloo, registered in the register of the Chamber of Commerce under number 41151066.



Please be referred to the correspondence in this regard in **Annex 1**. We would especially like to refer to our letter of today, in which we – amongst others – make clear that the presence of wolves does not only lead to conflicts with people, livestock, local farming and hunting communities, but also has a detrimental effect on natural habitats and the protected species that are dependent on these natural habitats.

Gathering information

We are currently still gathering data on the wolf and its impact and will send you updated information as soon as possible. With the wolf only having established itself in the Park since 2021, the definite effects of the presence of the wolf on the various natural habitats will not be clearly visible for several years. But despite its short presence, the wolf is already having major effects on the presence of grazers in the park. The mouflon population has declined from 340 to 30 individuals in that short period. We use the mouflon as natural grazer for the management of protected 'open' natural habitats in the Park. These natural habitats are essential for the overall biodiversity and several protected species (please be referred to our letters in Annex 1). In this letter, we will share the information we have collected so far. We expect to send updated information soon.

THE NATIONAL PARK

The Foundation has been confronted with the introduction of wolves into the Park in late 2021, causing rapidly decreasing numbers of wildlife and deterioration of Natura 2000 protected natural habitats.

The Park is a national park unique to the Netherlands. That uniqueness is easily understood and explained by its genesis. The Park was founded by the wealthy couple Anton Kröller and Helene Kröller-Müller, who bought the land on the Veluwe between 1909 and 1921 to create a place where art could be displayed for the public and to create private hunting grounds. In 1917, the Kröller-Müller couple owned no less than 6,800 hectares. This made the couple the most important large landowner on the Veluwe, after the Royal Family. The estate 'De Hooze Veluwe' was fenced off and Anton Kröller had red deer, wild boar and mouflon released there for hunting purposes. Helene Kröller-Müller concentrated on art (Kröller-Müller Museum).

Around 1935, the Foundation acquired ownership of the Park and it became a National Park. The aim of the Foundation was and is *"to acquire, manage and maintain a Dutch national park and cultural centre on the Veluwe, in the first place by acquiring and as such preserving and caring for the estate "De Hooze Veluwe"*. In the tradition of its founders, the estate was to be preserved as a natural monument and opened to the public. The Foundation and its organs - the Management Board, the Supervisory Board and the Advisory Board - are independent of the Dutch State.



Nowadays, the Park is still privately owned by the Foundation. This makes the Park, at least in terms of its size, unique in the Netherlands: the Park is the largest consecutive actively managed nature reserve in private ownership in the Netherlands. Unlike its name might suggest - National Park - the Park is emphatically privately owned. The Park is gated and charges entrance fees to its visitors. The Foundation is pretty much entirely dependent on visitor-related income to manage the Park. Furthermore, the Park receives a subsidy for nature management from the Subsidy System for Nature and Landscape (SNL) and some subsidies for specific actions, such as forest and nature restoration projects.

The independent position and the explicit mandate to the Foundation to 'look after' the Park in the tradition of its founders has led to the creation of a mix of landscapes and vulnerable biodiversity that is unique for the Netherlands in a relatively limited area. Examples include the European protected habitat types Species-rich *Nardus* grasslands (H6230), Dry sand heaths with *Calluna* and *Genista* (H2310) and Inland dunes with open *Corynephorus* and *Agrostis* grasslands (H2330). A wide variety of vegetation and landscapes automatically results in a wide variety of fauna. Based on scientific studies and evaluations and its own ideas, the Foundation pursues an active management policy. In the Dutch context, this means intervening in the landscape. Managing landscapes means removing vegetation where necessary to preserve the open character and the present development stages and differences in the vegetation. In this way, the biodiversity present is maintained. Much of the management is carried out naturally by the wild grazers present in the Park: such as deer, roe deer, mouflon and wild boar.

Current nitrogen deposition has the effect of accelerating natural succession of open habitat types, in particular in the form of accelerated clumping with Scottish pine. Among other things, the mouflon eats this Scottish pine. It is a natural grazer. In locations within the Park where the mouflon is mainly found, the storage of Scottish pine is kept in check by its presence. Since the 1970s, the 'pine shearers' of the Association *Vrijwilligers van De Hoge Veluwe* actively remove Scottish pines in the open areas where the mouflon is less active to prevent dense growth. If they don't, the open habitats will grow dense very quickly, resulting in the disappearance of Dry sand heaths with *Calluna* and *Genista* (H2310) and Inland dunes with open *Corynephorus* and *Agrostis* grasslands (H2330) and relatively one-sided pine forests replacing them. One-sided means: with few different types of flora and fauna. Since 1980, the Park has been (small-scale) ploughing, mowing and burning the heathlands to prevent grassing (overgrowth of heather plants by grasses).

Due to its unique way of management, the Park has an unprecedented diversity of landscapes and flora and fauna, and high wildlife visibility. Especially the consistent management since the Park's establishment plays a crucial role in this. Throughout those years of consistent management, vulnerable habitat types have been given the chance to develop to their full potential. Because of its high



biodiversity, the Park is appreciated by its visitors and, with a visitor count of 625,000 (2019), has become one of the biggest tourist attractions in the Netherlands. Thus, ecology and economy go hand in hand: the paying visitor appreciates the diverse landscapes and wildlife visibility, which in turn can be preserved through entrance revenues. Biodiversity (the core business) within the Park is thus not only unique for the Netherlands, but also constitutes the Park's business model.

NATURA 2000 AND THE SIGNIFICANCE OF THE PARK

The Park covers 5,400 hectares and is located on the Veluwe, which covers 91,200 hectares. The Park thus covers about five per cent of the entire area of the Veluwe. Most of the Veluwe, about 88,370 hectares, has been designated as a Natura 2000 site under the European Habitats and Birds Directives². This designation covers almost exclusively forest and nature. Land in agricultural use and buildings and farmyards are mostly excluded from the designation. The Veluwe Designation Decree³ designates 18 habitat types (or ecosystems) that are essential to the natural wealth of the Veluwe. The habitat type Species-rich *Nardus* grasslands (H6230), which occurs to a large extent within the Park, has been designated as a priority habitat type in the Habitat Directive. This means that these habitat types are particularly vulnerable and threatened, meaning that it is necessary to protect them as a matter of urgency. The Gedeputeerde Staten van Gelderland (Provincial Executive of Gelderland) have included the conservation measures and appropriate measures necessary for the management of the Natura 2000 area the Veluwe in the Natura 2000 Veluwe Management Plan (057) (the 'Veluwe Management Plan')⁴.

The Park occupies a central location on the Veluwe, between Hoenderloo, Otterloo and the north of Arnhem. Although the Park covers "only" five per cent of the entire Veluwe, its relative importance for the conservation of the protected Natura 2000 habitat types is high. More than half (58%) of the priority habitat type Species-rich *Nardus* grasslands (H6230) lies within the Park and 38% of the habitat type Inland dunes with open *Corynephorus* and *Agrostis* grasslands (H2330) lies within the Park. Also for habitat type Dry sand heaths with *Calluna* and *Genista* (H2310), the part present within the Park makes up a considerable part of the total area, namely about 15%. It follows from this that the Park and the Foundation's management of the Species-rich *Nardus* grasslands (H6230), Dry sand heaths with *Calluna* and *Genista* (H2310) and Inland dunes with open

² Directive 2009/147/EC.

³ Decision of 11 June 2014 and the amendment decision of 29 September 2016 ('Veluwe Designation Decree').

⁴ Province Gelderland, *Beheerplan Natura 2000 Veluwe*, December 2017, p. 37, https://media.gelderland.nl/Natuurbeheerplan_N2000_Veluwe_maart_2018_886c0a375b.pdf

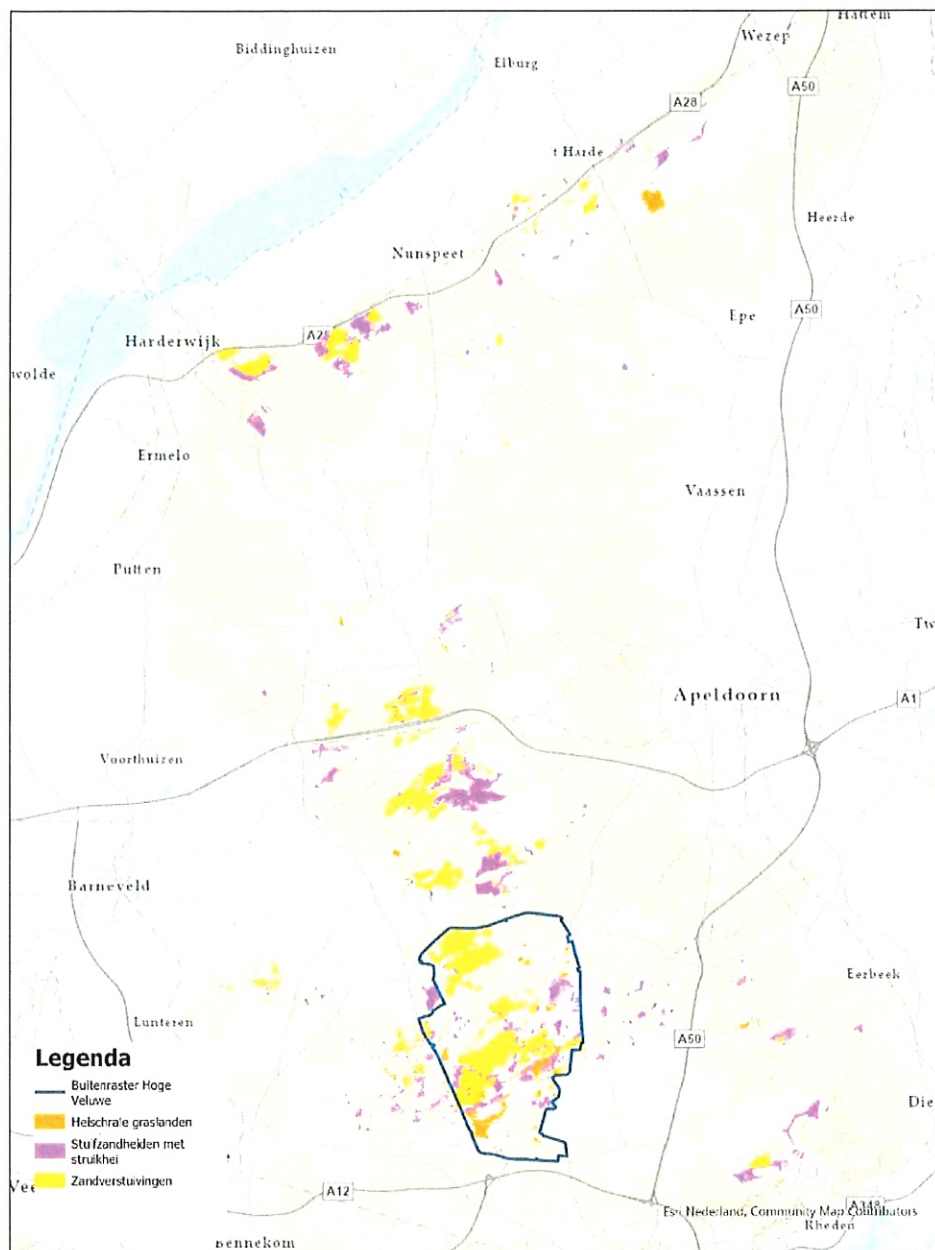


Corynephorus and Agrostis grasslands (H2330) are of disproportionate importance for the attainment of the conservation objectives as formulated in the Designation Decree Veluwe. Map 1 shows the location and size of the above-mentioned habitat types throughout the Veluwe. The figure clearly shows the high importance of the Park for these habitat types. The importance of protecting these habitat types has further increased significantly in recent times because of their nitrogen sensitivity.

Without active management, the Species-rich *Nardus* grasslands (H6230), Dry sand heaths with *Calluna* and *Genista* (H2310) and Inland dunes with open *Corynephorus* and *Agrostis* grasslands (H2330) are overgrown with nitrogen-loving vegetation very quickly due to natural succession. Not only the protected habitat types may be lost as a consequence, but fauna dependent on these nature types, such as several (also) disturbance-sensitive Birds Directive species, will also disappear.



Veluwe - selectie habitattypen



Map 1 - selection of habitat types for the entire Veluwe and marking the Park with outer grid. Shapefile via National Georegister (Natura 2000, habitat types, Province of Gelderland), Dec 2022.

- The blue line is the fence around the borders of the Park;
- The orange areas represent the Species-rich *Nardus* grasslands (H6230);
- The pink areas represent the Dry sand heaths with *Calluna* and *Genista* (H2310);
- The yellow areas represent the Inland dunes with open *Corynephorus* and *Agrostis* grasslands (H2330).



To minimise the impact of management on the listed sensitive and (priority) protected habitat types, natural grazing is preferred in management. The mouflon is a highly suitable grazer of aforementioned habitat types. The diet of the mouflon contains a significant proportion of (nitrogen-loving) Scottish pine. With their grazing behaviour, mouflons naturally keep the Species-rich Nardus grasslands, Inland dunes with open Corynephorus and Agrostis grasslands, and Dry sand heaths with Calluna and Genista, free of this vegetation and ensure the desired variety in the vegetation.

In the Netherlands, much importance is attached to the uniqueness and diversity of management styles of site managers. This is also endorsed in the Veluwe Management Plan:

"The Veluwe is vast and has a large number of terrain owners and managers. These owners and managers apply different principles and objectives for the management of their terrains. This results in different forms of management. These differences in management lead to a diversity in landscape and nature. This in turn translates into biodiversity. The province wishes to preserve this diversity in management style. Managers will be asked to implement a number of measures within the framework of Natura 2000 and PAS. Their own management style does not have to be changed for this." (p. 21)

Specifically with regard to (H6230) Species-rich Nardus grasslands:

"Grazing is particularly important for European dry heaths (H4030) and Species-rich Nardus grasslands (H6230). (...) It is up to the professionalism of the manager to choose that form of grazing and intensities that lead to the best target realisation." (p. 59)

The Park was designated as an example of successful nature management to conserve and protect biodiversity by the European Union-funded project Land Is For Ever in 2021 and rewarded with the *Belleuropa Award*.

Wolves population

Development of the wolf

Please be referred to paragraphs 3.1 – 3.4 of the report '*De wolf in Het Nationale Park De Hoge Veluwe: gunstige staat voor instandhouding?*' which is attached as **Annex 2**⁵. In this chapter, an overview until 2021 is provided of the different wolf (sub)populations as identified for:

- Europe; and

⁵ Annex 2 consists of an unofficial machine translation into English and the original Dutch version of the report.



- Netherlands / Veluwe.

Current population

The first wolf was encountered in the Park in the summer of 2021. A second wolf followed in autumn 2021. Five pups were born after the arrival of the second wolf.

The exact number of wolves that currently live within the Park is unknown. The Foundation has learned in the meantime the fence does not provide a barrier for the wolves at all; the wolves go in and out of the Park through several openings in the fence – the official entrances for visitors as well as entrances for wildlife such as badgers and foxes – and they also climb over the fence.

Impact of the presence of the wolf

Predation

The wolves decimated the mouflon population in the Park (from 340 to 30 individuals), and significant massacres were also caused among the other big game. A map of carcasses of wolf predation victims since 2021 has been attached as **Annex 3**. The orange dots represent the mouflon carcasses, the green dots the deer carcasses, the light blue dots the red game, the purple dots the wild boars, and the yellow dots are carcasses of unknown animals.⁶ Please take note of the fact that not every carcass is found or registered. The Foundation therefore deems the amount of killed animals by the wolf to be much higher in reality.

Detrimental effect on protected natural habitats

Please be referred to the correspondence attached in Annex 1 and chapter 2 of this letter which describe how the predation of the wolf causes several natural habitats to grow dense very quickly, resulting in the disappearance of the habitat types Species-rich Nardus grasslands (H6230), Inland dunes with open Corynephorus and Agrostis grasslands (H2330), and Dry sand heaths with Calluna and Genista (H2310) and relatively one-sided pine forests replacing them. This will consequently have the effect that several protected species dependent on these natural habitats will disappear as well. The letter of today, attached in Annex 1, also describes why sheared herds or other animals are not a suitable alternative for the mouflons to achieve the conservation objectives for the open protected habitats. Both because they will similarly be killed by the wolves and because they are not as effective as the mouflon.

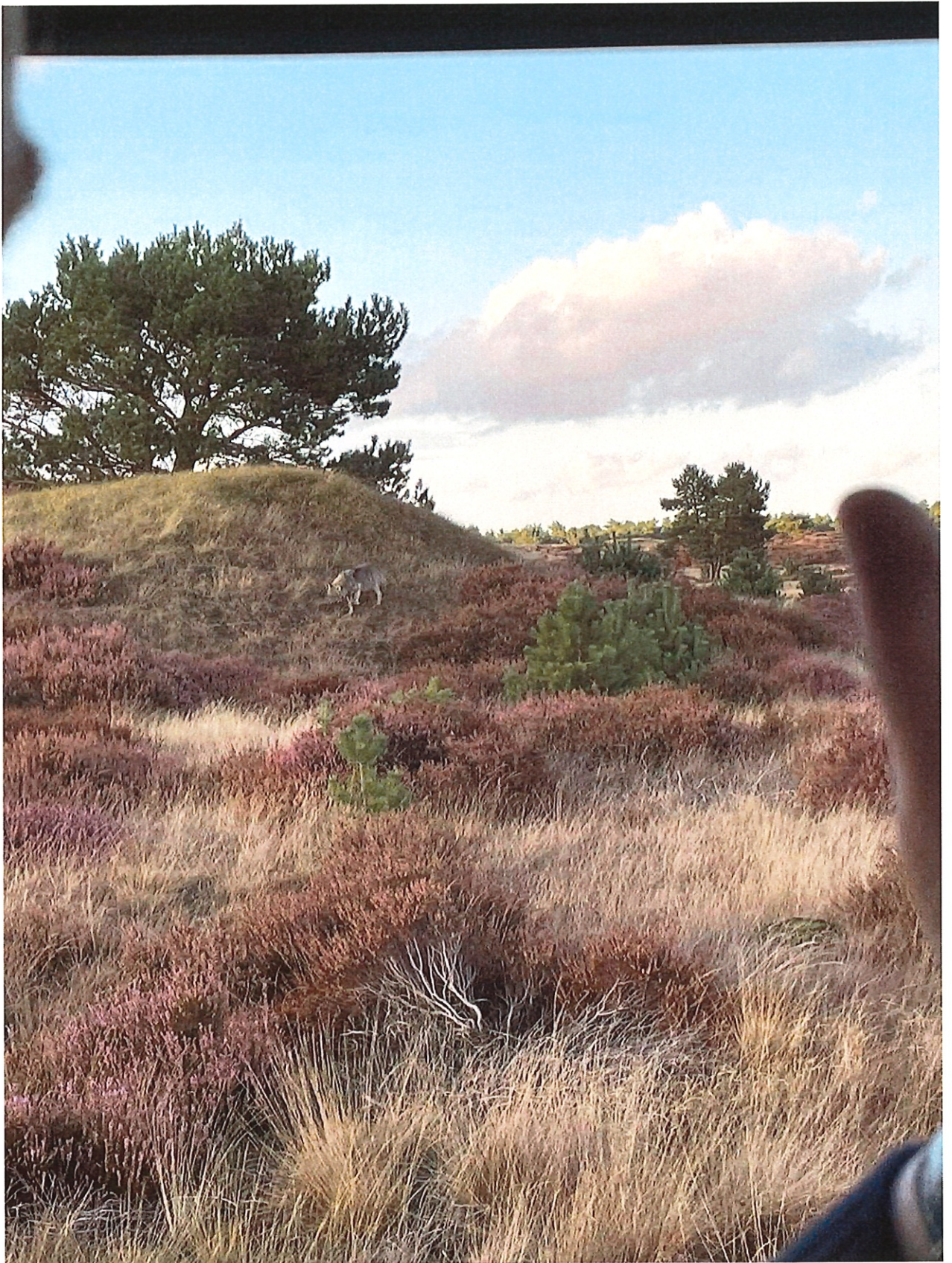
Close encounters

⁶ Determined visually on the basis of a throat bite and in some cases confirmed with DNA testing.



The presence of the wolf in densely populated Member States, such as the Netherlands, puts significant pressure on public health and safety as well. The wolves that reside in the Park are not people-shy. This leads to fearful situations, which fortunately have not led to an attack yet. We have included some examples of these close encounters. We remain at your disposal to provide you with more visual proof of these close encounters:









Concluding

The presence of the wolf in the Park puts significant pressure on other protected interests, including, in particular, conservation of Natura 2000 sites, nature management, property and public health and safety. Action at an EU level is therefore both appropriate and required. We look forward to learning the outcomes of this data collection and any actions proposed by the European Commission.

Please let us know if you have any further questions, we are more than willing to answer them in writing or orally.

Yours sincerely,

Seger van Voorst tot Voorst
Director-chairman of the Foundation