***VIDES KONSULTATĪVĀ PADOME***

„Latvijas Dabas fonds”, ”Baltijas krasti”, „Pasaules Dabas fonds”, „Ķemeru Nacionālā parka fonds”, “Teiču dabas fonds”, „Latvijas Ornitoloģijas biedrība”, „Vides fakti”„ Vides aizsardzības klubs”,  „Latvijas Makšķernieku asociācija”, „Zaļā brīvība”, „Ekodizaina kompetences centrs”, „Latvijas Botāniķu biedrība”, „Latvijas Atkritumu saimniecības asociācija”, „Zero Waste Latvija”, „Latvijas Vides pārvaldības asociācija”, „Latvijas Permakultūras biedrība”, “Korporatīvās ilgtspējas un atbildības institūts”, „Baltijas Vides forums”, biedrība “Latvijas Bioloģiskās lauksaimniecības asociācija”, “Dzīvnieku brīvība”

**Rīga, Peldu iela 26/28, LV-1494**

23.02.2024.

Nr.1-5.

***Mr David CLARINVAL,*** *Chair of the EU AGROFISH Council*

*Deputy Prime Minister and Minister of Small Businesses,*

*Self-employment, Small and Medium-sized Enterprises, Agriculture, Belgium*

***Mr Janusz WOJCIECHOWSKI***

*European Commissioner for Agriculture*

***Mr Virginijus SINKEVIČIUS***

*European Commissioner for Environment,*

*Ocean and Fisheries*

***Ms Sari ESSAYAH***

*Minister for Agriculture and Forestry of Finland*

CC: [comm-rep-latvia@ec.europa.eu](mailto:comm-rep-latvia@ec.europa.eu)

***The Environmental Advisory Council of Latvia appeals to the Council of the European Union to reconsider the Latvian delegation's support for the Finnish initiative “The re-evaluation of the Annexes of Habitats Directive as regards certain Large Carnivore Populations” (ST 5478/24)¹, and represented by the Minister of Agriculture Mr Armands Krauze at the 23 January AGROFISH Council meeting in Brussels, as illegitimate.***

Regarding the item "Habitats Directive and Large Carnivore Populations" included in the meeting’s agenda under "Any other business", the representatives of Latvia supported the proposal put forward by the Finnish representatives “The re-evaluation of the Annexes of Habitats Directive as regards certain Large Carnivore Populations” (ST 5478/24)¹. We draw your attention to the fact that the approval of the initiative to review the Annexes in the Habitats Directive regarding the large carnivore populations was not coordinated and reconciled with the experts of the Latvian nature protection non-governmental organizations.

The decision to support the Finnish initiative as Latvia's national position was neither discussed nor agreed upon by the representative professional environmental protection group – the Environmental Advisory Council, acting as the main legal social partner of the Ministry of Environmental Protection and Regional Development of the Republic of Latvia (MEPRD).

Instigating any initiatives to amend the European Union Nature Directives is considered to be an issue of utmost importance for the EU nature conservation policy according to the environmental and wildlife NGOs, therefore the position taken by the Ministry of Agriculture of the Republic of Latvia in supporting another EU member state’s declaration must first be discussed at the institutional intergroup and agreed by the experts in nature protection.

National positions on environmental and nature protection issues should be coordinated according to the member state's established procedures. Unfortunately, the Environmental Advisory Council and the partner organizations have learned about Latvia joining the Finnish initiative (ST 5478/24) from the January 23 AGROFISH Council meeting’s agenda published on the website.2

Moreover it should be pointed out, that the Finnish practice of the protected species Canis lupus management has been repeatedly challenged at the Finnish national courts and the Court of Justice of the European Union (CJEU). The CJEU judgment of 10 October 2019 on the Finnish wolf case C‑674/17, (the so-called “Tapiola case”) is considered to be a key milestone for all the EU member states regarding the protected large carnivore species’ management in accordance with the Article 16 of the Habitats directive.

In light of the aforementioned, the Environment Advisory Council of twenty nationally elected, professional environment protection and nature conservation NGOs of Latvia as the legal social partner of MEPRD, urge to consider the position of Latvia joining the Finnish declaration (ST 5478/24)1 proposed at the January 23 AGROFISH Council with the aim to re-evaluate the large carnivore protection statuses in the Habitats Directive as illegitimate.

*¹ [The re-evaluation of the Annexes of Habitats Directive as regards certain Large Carnivore Populations. Note from the Finnish delegation, supported by Austrian, Czech, Greek, Italian, Latvian, Romanian, Slovak and Swedish delegations (ST 5478/24)]*

*2 https://data.consilium.europa.eu/doc/document/ST-5205-2024-INIT/en/pdf*

On behalf of 20 organization of the Environment Advisory Council ,

Sincerely yours,

Chairman of the Council Juris Jatnieks

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ŠIS DOKUMENTS IR PARAKSTĪTS AR DROŠU ELEKTRONISKO PARAKSTU UN SATUR LAIKA ZĪMOGU