

Response to the public consultation on the inception impact assessment 'Protecting biodiversity: nature restoration targets under EU biodiversity strategy'

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The European Environmental Bureau (EEB), Europe's largest network of environmental citizens' organisations, supports the commitment by the European Commission to propose legal instrument setting binding EU nature restoration targets. This action has the political backing from both the Council and the European Parliament. Considering that the previous voluntary target to restore ecosystems has not been met, a legislative approach is needed. Other EU initiatives, including a reformed Common Agricultural Policy and implementation of the Farm to Fork Strategy, should also support nature restoration across the EU in addition to the action under the new legal instrument.

Please see the attached [paper](#) prepared by the EEB and the European Habitat Forum for detailed recommendations. The comments below respond to the points included in the inception impact assessment.

- **OBJECTIVES:** The primary objective of the legal instrument should be to reverse biodiversity loss, resulting in the large-scale restoration of ecosystem functioning, connectivity and resilience. As the supportive objective, the restoration law should contribute to climate change mitigation and adaptation.
- **BROAD ECOSYSTEM COVERAGE & URGENT ACTION:** We support the general objective of the initiative to restore ecosystems with the most potential to capture and store carbon and to prevent and reduce the impact of natural and human-made disasters. A quantifiable area-based target with additional qualitative criteria can provide broad coverage while also enabling the timely implementation of the targets. A requirement for Member States to draft restoration plans by a clear deadline can also contribute to the speedy implementation as it ensures that all relevant aspects have been considered from the start and sets out a clear trajectory for implementation.
- **FORMULATION OF THE TARGETS:** The legally binding restoration targets should be formulated as a clear and quantifiable area-based target to restore 15% of the EU's land and sea area by 2030 as well as a target to restore 15% of rivers into free-flowing rivers. Member States should be required to draft restoration plans in which they identify measures covering a diverse range of ecosystems within their territory.
- **MONITORING & REPORTING:** Monitoring and indicators for progress should build upon existing definitions and monitoring requirements under existing EU environmental legislation. Obligations stemming from the legal instrument setting restoration targets must be different and additional to obligations stemming from existing directives (e.g. the Nature Directives, WFD, MSFD) and should cover areas both within and outside the Natura 2000 network.
- **STEP-WISE APPROACH:** We welcome the policy option of a combined approach with a focused and effective restoration law as a first step and the option to add further binding targets once knowledge develops.

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- **NO DETERIORATION:** The long-term protection and improvement of the restored habitats needs to be ensured and should contribute to reaching other EU targets on e.g. new protected areas.
- **GUIDANCE & FINANCE:** The legal instrument should create an EU obligation to co-fund effective restoration and require Member States to match their restoration plans with an investment plan from both EU, national and private funding sources.
- **METHODOLOGY TO MAP, ASSESS & ACHIEVE GOOD CONDITION OF ECOSYSTEMS:** While such an EU-wide methodology has the potential to improve the condition of all ecosystems across the EU, this will be a significant task that should be carried out in addition, rather than through, the legal instrument setting legally binding restoration targets. To make significant progress in turning the tide of biodiversity loss by 2030, the restoration targets should be focused, quick and easy to implement and should lead to large-scale restoration to 'high-quality nature' on 15% of the EU's land and sea area, instead of aiming for incremental improvements in all ecosystems.

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