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Introduction	2
1. Primarily manage protected areas for biodiversity	3
2. Ensure quick and effective largescale nature restoration as of 2021	5
3. Make the CAP compatible with nature objectives and long-term food production	6
4. Tackle the cumulative impacts of human activities on oceans	7
5. Make the EU Forest Strategy coherent with the objectives of the EU Biodiversity Strategy	8
6. Ensure renewable energy is compatible with biodiversity protection	9
7. Enable speedy and efficient implementation and enforcement of the Strategy	10
8. Ensure sufficient funding to implement this Strategy in the long-term	11
9. Call on the EU to continue its leadership role on biodiversity at global level	12
Annex	13

## Introduction

We overall welcome the EU Biodiversity Strategy for 2030 as an ambitious and science-based blueprint to address the biodiversity and climate crises over the next 10 years as a fundamental part of the European Green Deal.

Adopted during the height of the COVID-19 pandemic, this strategy acknowledges the necessity to base the long-term policies on science in order to enhance our resilience to future crises. The Biodiversity Strategy needs to become the central effort for the truly green and sustainable post-crisis recovery and its delivery should be strongly linked with the implementation of an ambitious Farm to Fork Strategy.

The Strategy seems bold on paper but also contains commitments that will crucially need to be refined with concrete targets and clear guidance to ensure the Strategy is effectively implemented by Member States and other relevant stakeholders on the ground.

The clock is ticking and we have a very short window of opportunity to make a lasting change. The IPBES '2019 Global Assessment Report on Biodiversity and Ecosystem Services' highlights that nature is humanity's most important life-supporting 'safety net', and yet, the current response to biodiversity loss is insufficient as 1,000,000 species are already threatened with extinction. Scientists tell us that only a deeply transformative change across economic, social, political and technological factors can reverse nature decline.

The European Parliament has a key role to play in calling for this strategy to be implemented quickly and efficiently to bring about the change that is needed to ensure the survival of humanity and the resilience of our planet. In its own initiative report on the EU Biodiversity Strategy for 2030, the Parliament should highlight the following actions as priorities for the Commission to take:

- 1. Primarily manage protected areas for biodiversity
- 2. Ensure quick and effective large-scale nature restoration as of 2021
- 3. Make the CAP compatible with nature objectives and long-term food production
- 4. Tackle the cumulative impacts of human activities on oceans
- 5. Make the EU Forest Strategy coherent with the objectives of the EU Biodiversity Strategy
- 6. Ensure renewable energy is compatible with biodiversity protection
- 7. Enable speedy and efficient implementation and enforcement of the Strategy
- 8. Ensure sufficient funding to implement this Strategy in the long-term
- 9. Call on the EU to continue its leadership role on biodiversity at global level

# 1. Primarily manage protected areas for biodiversity

The Parliament should welcome the Commission's commitment to protect 30% of the EU's land and sea. To do so, clear guidance should be delivered to Member States to designate these areas with science-based criteria that consider the cumulative impacts of activities in the area and require an ecosystem-based approach to management.

Additional designations should as a priority focus on the completion of the Natura 2000 network. The level of protection under Natura 2000 sites should act as a minimum basis to formulate the ambition of these guidance criteria.

Moreover, too many protected areas in Europe are not managed effectively and are nothing more than 'paper parks'. The Parliament must call on the Commission to ensure that protected areas are primarily managed for biodiversity and reiterate the importance of effective monitoring and controls.

1. https://www.wwf.eu/wwf\_news/media\_centre/?uNewsID=352796



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To give nature the chance to recover, some areas must also be freed from most human extractive activities. The Parliament should strongly support the Commission's proposal to strictly protect 1/3rd of the protected areas, meaning 10% of the EU's land and sea area. This target should apply at Member State level following clear criteria, at least aligned with the IUCN categories I and II:

- At sea, strict protection should be applied through no-take zones.
- For freshwater ecosystems, remaining free-flowing rivers need to be protected from damaging interventions such as infrastructure for hydropower or navigation.
- On land, strictly protected areas should be able to reach their maximum potential for nature and must exclude all extractive and habitat-altering activities like logging or fishing, unless necessary for conservation purposes in line with the ecological requirements of the site.

The Parliament should echo its call for legally binding protected areas targets formulated through its resolution on the Conference of the Parties of the Convention for Biological Diversity (CBD COP15) in January 2020 by advocating for the 10% strict protection target to be integrated in a restoration law.



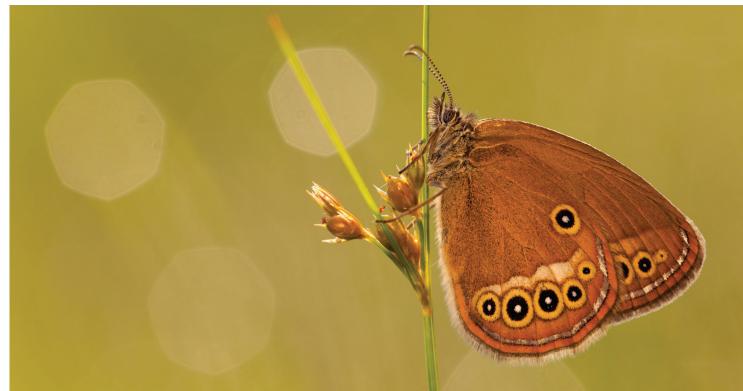
Atlantic Puffin Fratercula arctica ©Hari Nandakumar, Unsplash

# 2. Ensure quick and effective large-scale nature restoration as of 2021

Science shows that the natural state of nearly all ecosystems in Europe is degraded and in addition to protecting nature, large-scale nature restoration is needed.

The Parliament must call on the Commission to propose a European legislation on restoration in 2021 that can be implemented quickly and will deliver significant results for biodiversity, as well as climate mitigation and adaptation. The restoration measures should lead to permanent improvements and significant management changes with the aim of restoring resilient natural ecosystems.

Parliament is well placed to call on the Commission to ask the Member States to restore at least 15% of their respective territory, as part of a binding requirement in this restoration law. The Commission's commitment to restore at least 25,000 km of rivers into free-flowing rivers is also crucial for freshwaters ecosystems and the Parliament should ask for this target to be included in such legislation.



False Ringlet Coenonympha oedippus ©Jeroen Mentens

## 3. Make the CAP compatible with nature objectives and long-term food production

A Court of Auditors report from June 2020 clearly demonstrates that the so-called 'biodiversity' funding under under the Common Agricultural Policy (CAP) has not succeeded in halting the decline of farmland biodiversity despite it being its primary objective. 77% of funds the Commission currently claims to be spent on biodiversity are actually CAP funds that have been widely demonstrated to be doing more harm than good.

The Parliament must welcome the Commission's ambitious commitments to reduce the impact of agriculture on the environment and call on these important targets to be translated into the revised CAP. For instance, the 50% pesticides reduction target needs to be integrated in the announced revision of the Sustainable Use of Pesticides Directive to make this target legally binding. The commitment to bring 10% of agricultural area under high-diversity landscape features is also essential to leave space for nature on farmland, should be implemented at farm-level on all types of agricultural land and be a basis for farm subsidies in the CAP.

In its report, the Parliament should also remind the Commission that sustainable farming should go hand in hand with the restoration of farm landscape elements and other pro-biodiversity measures. Long-term production is only possible if we stop soil degradation and allow ecosystem services such as pollination and natural pest control to come back.

Meat and dairy consumption and biofuel production from dedicated crops are a main driver of intensification of land-use and of the continued increase of the EU's global footprint. This should be addressed by the Parliament in its call for change of the current intensive agricultural model by asking for robust policies to reduce consumption and waste.



# 4. Tackle the cumulative impacts of human activities on oceans

The Parliament should stress in its report that an ecosystem-based approach to management should take into account the cumulative environmental impacts of all activities happening at sea. The Parliament should also welcome the Commission's 'zero tolerance' position towards illegal practices but should call for this principle to apply to all degradations of marine ecosystems, including e.g. bycatch.

Moreover, the proposed action plan to conserve fisheries resources and to protect marine ecosystems by 2021 must contribute to restoring populations of species and habitats at sea and include fishermen and women as key parts of the solution. Healthy seas are the only way to secure their activities in the long-term. The Parliament should specify in its report that the action plan should eliminate highly destructive gears and that fishing actors should be supported to do so.

Overfishing is the primary threat to marine ecosystems. The Parliament should request the Commission and Member States to show courage by committing to a reduction of fish consumption. In addition, the Parliament should remind the Commission that aquaculture can be highly impactful to the marine environment and advocate for closed-circle aquaculture and extensive nature-based farming systems.

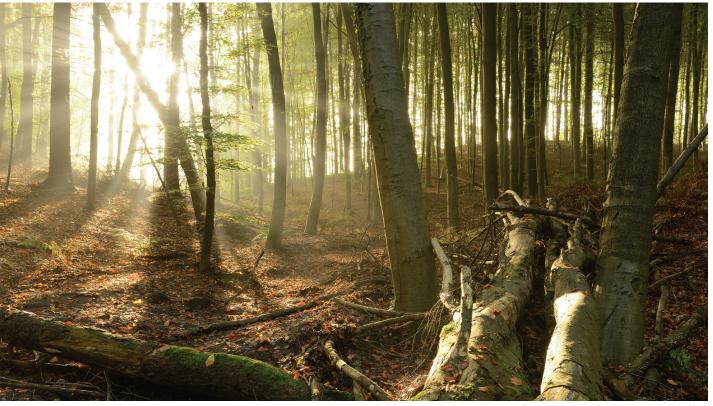


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# 5. Make the EU Forest Strategy coherent with the objectives of the EU Biodiversity Strategy

The European Parliament should emphasize that the upcoming EU Forest Strategy needs to be fully in line with the EU Biodiversity Strategy. The Parliament should ensure that the sustainability criteria on forest biomass for energy in the Renewable Energy Directive are made much more robust, as they currently incentivise types of bioenergy that increase emissions dramatically compared to fossil fuels. Land should not be used for dedicated bioenergy feedstock and trees should not be harvested for energy.

Forest protection and forest restoration are both necessary to bring back the ecological functions we need to, inter alia, prevent floods and create stable and resilient carbon stocks. Natural and assisted regeneration of native forests and other ecosystems is the most effective, cost-effective and resilient strategy to pursue. The Parliament should clarify that tree planting does not cover all the functions of forest restoration and is not always appropriate so it should always follow the best scientific advice, be used in support of nature restoration rather than to establish monoculture plantations and should mainly be focused in urban and peri-urban areas, agroforestry and landscape elements on farmland.



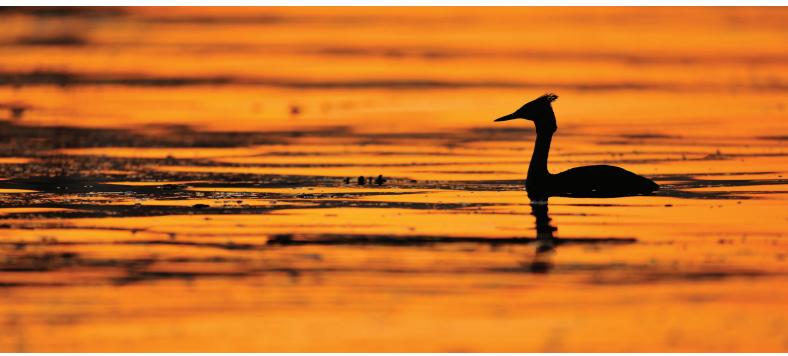
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# 6. Ensure renewable energy is compatible with biodiversity protection

The Parliament must stress the necessity for Member States to undertake sensitivity mapping to understand the impacts of energy infrastructure on species protected under the Birds and Habitats Directives before developing renewable energy parks:

- Especially in relation to offshore wind, as a first principle future marine renewable energy developments should not be placed within Marine Protected Areas (MPAs) or other ecologically valuable areas for sensitive species and habitats and those that act as refuge from climate change;
- Instead of creating and investing in new hydropower, in the EU there is the need to refurbish already existing power plants to reduce the damage on freshwater ecosystems;
- Renewable energy installations on urban or industrial buildings and energy savings should be the priority.

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# 7. Enable speedy and efficient implementation and enforcement of the Strategy

The proper implementation of EU environmental legislation by Member States and its enforcement by the Commission is a long standing serious challenge.

The Parliament should acknowledge the Commission's intention to strengthen the governance framework for the implementation of the EU Biodiversity Strategy. However, we are running out of time to address the environmental crisis and the Commission must translate this new commitment into a yearly monitoring system of the implementation of the Strategy on the ground which could be enabled by the use of new technologies. The Parliament should also call on the Commission to handle infringement packages more effectively and more transparently, including through the regular follow-up of cases. To undertake these changes, capacity is crucial and concrete budget should be allocated to increase human resources in both the Commission's services and in the Member States.

Common Greenshank Tringa nebularia ©Yves Adams



# 8. Ensure sufficient funding to implement this Strategy in the long-term

The proposed 20bn€/year to be allocated to nature is the very minimum needed to start implementing the Biodiversity Strategy. However, this is not sufficient to implement the large-scale restoration that we desperately need. It is extremely worrying that the current 2021-2027 Multiannual Financial Framework (MFF) proposal and Recovery Package do not earmark funding for biodiversity. Instead, the Parliament should reiterate its call from the resolution on the CBD COP15 from January this year for at least 10% of the MFF to be allocated to biodiversity. To enable a green recovery, the national recovery plans should also not be spent on any activities that are harmful to biodiversity or that will increase emissions.

The Parliament should call for a minimum budget of 15bn€/year under the CAP to be set for biodiversity schemes, with proper ex ante and ex post monitoring for effectiveness. The conditionality on ecoschemes should also be strengthened, including through scientific monitoring. The Strategy will be only as good as farmers' ability to transition to a more nature-friendly way of farming which is why the CAP reform should clearly support these important actors in coherently implementing the Biodiversity and Farm to Fork Strategies.

Equally, funding must meet the Commission's commitment to protect and restore marine ecosystems. The Parliament must ensure that none of the money coming from the European Maritime and Fisheries Fund (EMFF) is used to finance harmful activities. Instead, 25% of the EMFF must be ring-fenced for nature protection and 25% for data collection and controls at sea. For aquaculture, the EMFF should only support aquaculture production through loans and guarantees and support aquaculture farmers in managing natural areas through diversified incomes.

# 9. Call on the EU to continue its leadership role on biodiversity at global level

The Parliament should recall the important role of the Commission in championing concrete and ambitious asks for the Global Biodiversity Framework at the CBD COP15. The Commission should put forward bold targets on species recovery, protected areas, large-scale nature restoration and on addressing agricultural and fisheries as main drivers of biodiversity loss. The Parliament should also demand the significant reduction of the EU's global ecological footprint, not least to enhance the credibility of the EU's role as a global leader on biodiversity.

The failure to achieve the Aichi targets is shameful. This time, we need a SMART and comprehensive monitoring framework that must be science-based, independent, transparent and include accountability and ratcheting mechanisms.

The Parliament should call on the Commission to adopt clear commitments on international resource mobilisation in order to meet the SDGs and the objectives of the Biodiversity Strategy. The NaturAfrica initiative should be a first important place to translate these commitments into action, alongside the "Larger than" initiatives.

More than ever, we know that our health is linked to our planet's health. That is why the Parliament should echo the ambition of the Biodiversity Strategy by calling for the right to a healthy environment to be added to the Universal Declaration of Human rights.



### **Annex**

## ANSWERS TO COMMON MYTHS AND QUESTIONS ON THE IMPLEMENTATION OF THE BIODIVERSITY STRATEGY

Following the publication of the EU Biodiversity Strategy, similar points have been raised in public debates and can easily be answered by looking into the strategy itself and existing (Better Regulation) provisions of the Commission.

#### I. As to the SMART targets in general



Answer: According to the Better Regulation Guidelines of the Commission, impact assessments are carried out for legislative proposals. The strategy as such is a Communication from the Commission and does not need an impact assessment. Moreover, it is important to note that all targets proposed are based on science and are realistic. An impact assessment will be done for the follow-up work on specific commitments for which legislative proposals will be developed, like for the legally binding restoration targets (or for instance, the adjustment of the Sustainable Use of Pesticides Directive, to implement the pesticides reduction target). Furthermore, the Commission in the EU Biodiversity Strategy itself already foresaw several technical follow-up processes to get more clarification on specific issues. Those processes guarantee participation of Member States and stakeholders, so that the best solution can be found in order to implement the commitments needed to tackle the biodiversity crisis.

#### II. As to protected areas

### Will economic activities be excluded in protected areas?

Answer: No, with the 30% target for protected areas economic activities are not excluded in general. Economic activities (such as tourism, farming, etc.) are in general possible in protected areas both designated under Natura 2000 and under national categories. What is important to clarify is that the primary objective of protected areas is biodiversity conservation, so areas should be primarily managed for biodiversity. Provided that activities are not detrimental to achieving the conservation objectives, they will continue to be possible. Often, certain traditional practises are even needed for the proper management of certain habitat types.

On the other hand, it is also clear that stricter conditions, excluding all extractive and habitat altering activities, have to be in place for the (smaller, one third of the protected areas) category of strictly protected areas.

### What does "strictly protected area" mean?

Answer: The Commission announced in the Strategy that it will start in 2020 a technical follow-up process to define, together with Member States, new harmonised guidance containing criteria for strict protection (and also for the definition of the 30% generally protected area). Those processes already started (with stakeholders at EU level being involved), hence the needed clarification will be achieved in the foreseen (technical) processes. The draft technical document on this from the European Commission is expected in November.

#### III. As to the agricultural landscape



<u>Answer:</u> Studies from across Europe show that if a minimum of 10-14% of agricultural land were to be set aside for native vegetation, birds and other wildlife would recover. This is the minimum. At landscape-level, 26-33% may be required.



Answer: Studies suggest that intensification of farming and related loss of natural habitats and species are reducing crop yields, whereas restoration of space for nature can improve yields. Biodiverse landscape features are also positive for the climate because hedgerows and natural vegetation provide carbon sinks. Natural vegetation is also beneficial for water, hedgerows, prevention of soil erosion, flood risks, natural pest control, pollination, etc. Also, the EU does not have a food security problem, and did not have it during the Covid-19 pandemic. Instead, we are overproducing food, including meat and dairy. The EU's current production system produces a lot nowadays but undermines the ability to produce in the long-term, by depleting soil and destroying essential ecosystem services.

#### IV. As to nature restoration

## Why has there not been an impact assessment for the restoration target?

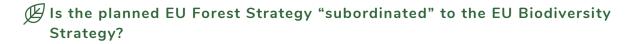
<u>Answer:</u> According to the Better Regulation Guidelines of the Commission, impact assessments are carried out for legislative proposals. The Strategy as such is a Communication from the Commission. It will carry out an impact assessment on the follow-up work of specific commitments, inter alia on the planned restoration targets.



Will Member States have to designate 15% of their land for restoration (the target NGOs are advocating for, respectively the number that is already now to be found in the EU Biodiversity Strategy 2020) on top of the target for 30% protected areas?

Answer: No, the restoration targets do not per se add on to the size of protected areas. The restoration agenda should trigger certain (active and passive) measures to bring back nature to the path of recovery. These restoration measures can happen in areas that then contribute to the network of protected areas (30% of EU's land and sea area).

#### V. As to protecting forests



Answer: There is no such thing as "subordination". Instead, the European Green Deal intends to achieve a holistic approach. According to the European Green Deal Communication, the planned EU Forest Strategy is one element of the European Green Deal, the EU Biodiversity Strategy is another element. In order to achieve coherence, the Green Deal Communication foresees that the Forest Strategy will "build on" the EU Biodiversity Strategy. The Biodiversity Strategy addresses forest related ecosystems with the much needed angle of protecting (and restoring) them, both for biodiversity and for climate reasons. The Biodiversity Strategy also foresees planting at least 3 billion additional trees in the EU by 2030, in full respect of ecological principles, in particular in urban areas. The EU Forest Strategy, which is a commitment in the Biodiversity Strategy itself, foreseen to be presented in Q1/2021, can build on these commitments and define further criteria, also with regards to sustainable use. The Commission has also started technical work to agree on definitions such as old growth forest, closer to nature forestry, etc.



Answer: Although the Treaties for the European Union make no provision for a common forest policy, there is a long history of EU measures supporting certain forest-related activities, coordinated with Member States mainly through the Standing Forestry Committee. However, forests are affected by a broad array of Community policies and initiatives arising from diverse EU sectoral policies (such as nature protection). Since the EU Biodiversity Strategy is looking at forests mainly in relation to the protection of biodiversity and in the context of climate change impacts and policies, the EU can legislate on environmental protection.

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Recommendations for the European Parliament





