



Brussels, 29<sup>th</sup> April 2021

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To:

Frans Timmermans, Executive Vice-President of the European Commission,  
Valdis Dombrovskis, Executive Vice-President of the European Commission,  
Virginijus Sinkevičius, EU Commissioner for Environment, Oceans and Fisheries

**Subject: Lack of targeted biodiversity spending in the Italian National Recovery and Resilience Plan (NRRP)**

Dear Executive Vice-Presidents,

Dear Commissioner,

The corona pandemic is an enormous challenge for our society. Therefore, we have welcomed the political agreement of the EU legislators on the “Next Generation EU” package, including the Recovery and Resilience Facility (RRF). Now it must live up to its name and serve the well-being of both, the present and the future generations. Investments under the RRF therefore must be in line with the European Green Deal and its targets on climate and biodiversity, while respecting the “do-no-significant-harm” principle.

The Italian government has presented its final version for the national Recovery and Resilience Plan (RRP) earlier this week, which will now be sent to the European Commission for the final evaluation. This plan is not in line with the objectives of EU Biodiversity Strategy for 2030 as well as the environmental obligations under the EU regulation on the Recovery and Resilience Facility (RRF). It therefore would jeopardize the ambition of the overall Green Deal and severely hamper the chances to reach the EU biodiversity goals for 2030. We strongly urge you, to use the coming two months of the evaluation phase and the ongoing dialogue with the Italian government, to ask for improvements on the quantity and targeting of biodiversity spending and the implementation of the Do-no-significant-harm principle.

As it is presented now, the plan does not fulfil the obligation, set out in the EU regulation, to spend 37% of the national allocation for grants and loans on climate measures. The current expenditures foreseen for biodiversity-targeted investments only amount to 0,51%. To close this evident gap, special attention needs be given to one area of concern: the role of biodiversity investments in the draft plan. The EU regulation as well as the guidance documents provided by the EU Commission put the Member States into the obligation to include appropriate measures in their NRRPs. Yet the draft, as presented by the Italian government, includes very little investments in nature and ecosystems despite existing proposals on national level

([https://www.governo.it/sites/governo.it/files/PNRR\\_0.pdf](https://www.governo.it/sites/governo.it/files/PNRR_0.pdf)). Besides the low quantity, the proposed

measures do not sufficiently target the improvement of the Natura 2000 network in Italy, e.g. they completely ignore the areas of need, identified under the Prioritised Action Framework (PAFs), such as the restoration of wetlands hosting several habitats and species of community interest.

Another area, which gives us great concern is the implementation of the Do-no-significant harm principle, as it is defined in the RRF regulation. Many investments, proposed by the Italian government, will have a negative influence on natural habitats and therefore will lead us away from reaching the objectives of the EU Biodiversity Strategy. There are further attempts to weaken existing environmental tools such as the SEA and EIA, to ensure a speedy roll-out of the investments. Yet this reduced due diligence will increase the harm and pressure put on the natural environment and we strongly oppose any attempts by-pass established approval procedures.

An example: in the proposal of Piemonte Region for the NRRP, there are a series of projects included in the Plan called "Avvicinare le Montagne" for the development of a district for winter and summer sports, even within a SPA/SAC; on February 2018, the SEA procedure for "Avvicinare le Montagne" was opened but since then everything has stopped at the Scoping phase due to some environmental criticalities that have emerged.

There is still time to ensure that the joint efforts of the EU and its Member States will lead to a green and just transition, building on the potential of nature positive investments. It is crucial that the EU Commission uses the evaluation phase of the RRFs to ensure their alignment with the European Green Deal. We also stand ready for a personal exchange with you at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ariel Brunner', written in a cursive style.

Ariel Brunner, Interim Director and Senior Head of Policy, Birdlife Europe and Central Asia