



Position Paper

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The EU  
Biodiversity  
Strategy to 2030

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*Walsbergen, Linter, Vlaams-Brabant, Belgium ©Jeroen Mentens, Vilda*



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# Executive summary

As Greta Thunberg says, our house is on fire! Are we going to remain at the dining table, urging our children to simply eat a little faster in the hopes dinner will be done before we burn? This is the tragic analogy we are living as we face our planetary “fire”.

Nature and our climate, two sides of the same coin, are in crisis. Therefore our planet, our home, is in crisis. The science is unequivocal that we have a very small window in which to act if we are to save humanity and society from collapse.

The wealth, the power and influence, and the unbridled consumption of Europe obligate us to lead the fight in taking comprehensive and integrated measures across all sectors of our society to stand a fighting chance of survival.

This moment in time with new EU political leadership taking power has thankfully seen a seemingly strong commitment in language to finally act. Demands that they do so are loudly expressed around the globe by citizens, firstly youth, then their elders, all echoed by scientists of all stripes. But the actions they take must surpass photo opportunities, buzzwords and feel-good strategies which enable business-as-usual to masquerade as change.

Make no mistake! The scientists are indeed ringing a last chance tocsin to wake us from our slumber. Over one million species, more than ever in history, are threatened with extinction. Seventy-five percent of all land and almost half of all marine and water ecosystems have now been seriously and negatively altered by humans. In the EU alone, unsustainable intensification of agriculture and fisheries have left only 23% of protected species and 16% of protected habitats in good conservation, and therefore sustainable, status. These scientists tell us we have just 11 years for a 50% chance to limit global warming to the hoped for maximum of 1.5C, which is rapidly becoming impossible.

With these threats just the tip of the rapidly melting iceberg, we must act now. There is no time to delay, attempting the “realistically achievable” is a fool’s game that condemns us to failure.

The EU has a strong existing legal framework in place now, from the Birds & Habitats Directives, known as the “Nature Directives”, to the excellent Water Framework Directive, which provide an immediate way forward if they were to be properly enforced and implemented and the Natura 2000 sites fully protected. The lack of courage to do so over the past two decades however has led to the catastrophic loss of biodiversity we now see. We do not need to reinvent the wheel, we just need to inflate the tires properly. But the tool box is not complete. In particular, we are cruelly missing any hard-hitting policies to drive active large-scale ecosystem restoration and reduce the massive global footprint of our wasteful consumption.

BirdLife Europe and Central Asia has prepared the following integrated cross-sectoral roadmap – positions and measures designed to save our seas, our land, our water, our nature and its species, its biodiversity. Europe must assume a moral, political and economic global leadership position now. If these ideas were translated into the European Union’s strategy, and then acted upon, this would be a credible start to extinguishing the inferno that threatens to consume our home and all of us within it.



# Context

Nature is in crisis. And nature is intrinsically linked to humanity: people have a profound relationship to the ecosystems in which they live, as they provide the essence for our survival: fertile soils and seas, fresh water, a stable climate; all endow us with the basis with which we've developed our cultural systems. We know that the continued loss of species and degradation of habitats threatens our wellbeing and ultimately the survival of humanity. Humanity is, therefore, in crisis.

Recent landmark intergovernmental global reports<sup>1</sup> show that we are changing our planet beyond recognition. People are pushing the Earth to its limits and capacity to function. Seventy-five per cent of all land and almost half of all marine and water ecosystems have now been seriously altered by humans. The populations of many species are in freefall because of these impacts, with over one million species threatened with extinction, more than at any other time in human history.

In the European Union (EU) the picture is similar. Lack of enforcement and implementation of already existing legislation, and unlimited intensification of production means in agriculture and fisheries, have led to a scenario where only 23% of protected species and 16% of protected habitats are in a good conservation status.

Last year the world's leading climate scientists warned that we have only 11 years for a 50% chance to limit (global warming) to a maximum of 1.5 °C, above which we would see devastating impacts on people and biodiversity. Climate change is interwoven with, and exacerbates, this catastrophic loss of biodiversity. Nature is therefore key to help us mitigate and adapt to climate change. As these issues are intrinsically linked, they must be considered together.

Habitat degradation stemming from the way we manage our land and oceans is a major cause of biodiversity loss and a key driver of climate change<sup>2</sup>. Impacts of land use change include deforestation and peatland degradation, which alone are responsible for about 10-15% of total CO<sub>2</sub> emissions<sup>3</sup>. Nature is part of the solution to climate change, important habitats such as forests, meadows, kelp forests, coastal wetlands and peatlands, store and sequester carbon, and evidence shows that biodiverse ecosystems do this better, as well as provide other benefits for people. Protecting and restoring these areas could deliver one third of the emissions reductions and increased carbon storage needed to keep warming below 1.5°C, as well as returning space to nature and biodiversity<sup>4</sup>.

Understanding the threats, we must act now. This is no longer a problem for the future. Waves of popular protests and momentum are sweeping across Europe and the world led by a groundswell of youth advocacy calling for action. We must listen to the science and listen to youth. Nature is in crisis: we face an acute climate emergency and ecological breakdown. Now is the time to act and be ambitious.

As such, we cannot expect action that is "realistically achievable" under business as usual. These are recommendations based on what is needed in order to save society from collapse – and lead to truly transformative change<sup>5</sup>.

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1 IPBES Global Assessment, 2019. <https://www.ipbes.net/global-assessment-report-biodiversity-ecosystem-services>

2 See BirdLife International's Nature-based Solutions position here: [www.birdlife.org/post2020](http://www.birdlife.org/post2020)

3 <https://www.ipcc.ch/srccl-report-download-page/>

4 <https://www.pnas.org/content/114/44/11645>

5 See BirdLife International's Transformative Change briefing here: [www.birdlife.org/post2020](http://www.birdlife.org/post2020)

# Why have we failed before?

Despite a strong legal framework in place – the EU’s Birds and Habitats Directive or “Nature Directives” – European efforts to curb and halt biodiversity loss in the last two decades have failed miserably. The thorough evaluation of these Directives in 2016 concluded they are fit for purpose. Enforcement is, however, weak at national levels, and many actions that break the law go unchecked, and unpunished.

The EU Biodiversity Strategy to 2020, adopted in 2011, aimed at halting biodiversity loss and the degradation of ecosystems, and set out the contribution of the EU to halting global biodiversity loss. Its six targets cover EU nature legislation, ecosystems and their services, agriculture and forestry, the marine environment, invasive alien species and global biodiversity loss. The targets are accompanied by detailed actions for the European Commission (EC) and the EU Member States (MS).

The latest assessment of the current Biodiversity Strategy to 2020 points out that, two years to the deadline, the EU is far from having halted biodiversity loss in its territory. There has been little progress in four of the six targets, and the situation of biodiversity in agricultural and forest ecosystems has worsened since 2010. The majority of actions also saw little progress or outright failure.

This is mainly due to poor strategy design, ambiguous targets, lack of national accountability and a lack of commitment to change the status quo that is destroying nature. Independent indicators are key to telling us the state of nature, and those were mainly absent in the previous strategies. In particular, the development of necessary new legislation as well as the financing and implementation or enforcement of existing legislation was poor. This suggests a lack of high-level political commitment.

Policy coherence with other sectors was generally lacking. In addition, those sectors in which biodiversity integration is essential, failed to take responsibility on delivering the objectives of the strategy. These included, for instance, the EU’s failure to address consumption patterns and phase out harmful subsidies<sup>2</sup>.



Valley of the river Scheldt  
©Yves Adams, Vilda

1 [https://www.birdlife.org/sites/default/files/attachments/eu\\_biodiversity\\_strategy\\_2020\\_birdlife\\_report.pdf](https://www.birdlife.org/sites/default/files/attachments/eu_biodiversity_strategy_2020_birdlife_report.pdf)

2 See BirdLife International’s Mainstreaming position here: [www.birdlife.org/post2020](http://www.birdlife.org/post2020)



# The European Green Deal: a once in a generation opportunity

Saving biodiversity is about saving species, their habitats, and their interactions. We need to put nature and natural carbon sinks on a path to recovery and ecosystems on a path to resilience if we are to be able to withstand the reality of current climate change projections. Political momentum is building in the EU. To deal with the ecological catastrophe that is upon us, the newly appointed College of Commissioners has received a set of mission letters that break radically with the paralysis of the past 15 years. New Commission President von der Leyen has promised to publish a European Green Deal in the first 100 days of the new Commission, of which a critical component will be the EU Biodiversity Strategy. The New Commission President has said that she wants the EU to lead globally in this area.

The upcoming Convention on Biological Diversity (CBD) COP 15 in Kunming, China, in October 2020 will deliver a global biodiversity framework post-2020. The EU, and its Member States (MS), are each party to the convention, and will need to deliver renewed National Biodiversity Strategic Action Plans (NBSAPs).

The EU and its MS are an important player in the discussions, as they vote as a block. Whatever ambition – or lack thereof – the EU puts down in the European Green Deal, and shares at CBD COP 15, is likely to encourage ambition from other global players, and will be the basis for what they will need to commit to do at home. The EU's credibility to lead on biodiversity action will depend on genuinely ambitious action at home.

The EU has a huge budget that could start funding the critical systemic change to a society that respects the rule of law and nature. Currently, flawed incentives and investments in the EU lock us on a path to destruction of nature. We must target the climate and biodiversity crises with ambition and credibility. We can no longer afford the status quo. This change will need to be transformative, and will need to overcome the economic growth paradigm. Change will need to bring social justice and socio-economic fairness<sup>1</sup>.

For this change to occur, MS need to fully implement the environmental acquis, which needs to be enforced across the EU. Large sections of the EU budget will need to be re-directed towards this end. This will only be achieved when biodiversity needs are effectively mainstreamed across all EU policies and economic sectors. The EU's net ecological-footprint on global ecosystems needs to be positive: the combination of EU consumption and production, development aid, trade policies and financial regulations overall must support and enable global biodiversity conservation, rather than its degradation.

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<sup>1</sup> See BirdLife International's Transformative Change briefing here: [www.birdlife.org/post2020](http://www.birdlife.org/post2020)

# Importance of interlinking the biodiversity and climate crises

Following the Paris Agreement, the EC has already stepped up its ambitions regarding climate action and is calling for zero net emissions by 2050. The EU needs to show in CBD COP 15 the same level of ambition it did when the Paris Agreement was signed.

To save nature, and knowing that biodiversity loss is the flip side of the same crisis, we need to target climate and ecological breakdown together. For this, the new EU Biodiversity Strategy and the vision of a “Climate Neutral EU” will need to be aligned along the following principles:

1. Carbon sequestration should always contribute to ecosystem and biodiversity health and resilience.
2. Adaptation policies to climate change should prioritise nature-based solutions, consider and avoid impacts on biodiversity, build resilience, and be synergistic with ecosystem restoration.
3. We must drastically reduce our consumption, and increase efficiency in the use of energy, natural resources and fish/meat/dairy products. We need to replace the growth paradigm with one in which humans live in harmony with nature and the limits of the planet.
4. Renewable energy and related infrastructures must be pursued in the most biodiversity friendly manner possible, including through careful planning that ensures spatial planning, technical mitigation and balanced deployment of technologies, in line with ecological carrying capacity.
5. Resilience of ecosystems and species to climate change needs to be assisted through addressing other stress-factors (such as availability of space, availability of food and water, impacts of Invasive Alien Species), as well as by specific biodiversity adaptation measures that seek to optimise nature with the foreseen impacts of climate change in sight.

Golden Eagle *Aquila chrysaetos* and Red Fox *Vulpes vulpes* ©Yves Adams, Vilda





# Mission targets

The below set of mission targets addresses the scale of the crisis and fulfils the criteria set above. It is ambitious. It shows leadership. It is measurable. It sets forth a vision to 2050, leaving enough time for nature to be healed and its ecosystems to function. It sets a 2030 stepping stone that is ambitious and drives action from all stakeholders.

- In 2050 all species and habitats in the EU, protected under the Birds and Habitats Directives, will have been brought to favourable conservation status<sup>1</sup>, and the EU will not drive extinctions and ecosystem degradation beyond its borders<sup>2</sup>.
- By 2030, 30% of EU land and EU sea areas is primarily managed for nature and biodiversity<sup>3</sup>.
- By 2030, in the EU, at least 50% of species and habitats protected under the Birds and Habitats Directives will have a favourable conservation status, no species or habitat will have deteriorated compared to 2020, and status and trends will be known for all.
- By 2030, in the EU, at least 75% of species in the Birds Directive will have a secure<sup>4</sup> status, no species will have deteriorated compared to 2020, and status and trends will be known for all species.
- By 2030, the EU will have reversed the negative trends for common species, as measured by appropriate indicators such as those for common birds and butterflies<sup>5</sup>. Across Europe, robust monitoring will have been put in place and indicators are developed for additional key taxonomic groups.

1 The EU must now embrace the use of "Favourable Conservation Status" (FCS) as the system assessing that species have reached appropriate population levels, that they occupy their historical range, and that they use all available habitat within that range. This should be achieved for all species, in particular all species of birds, regardless of their Annex status. Please see BirdLife Europe position on Setting Conservation Objectives for birds: [https://www.birdlife.org/sites/default/files/bhdtf\\_position\\_2013\\_setting\\_conservation\\_objectives\\_for\\_birds.pdf](https://www.birdlife.org/sites/default/files/bhdtf_position_2013_setting_conservation_objectives_for_birds.pdf)

2 This follows the CBD goal set for all species to be restored by 2050 globally.

3 "Primarily managed for nature and biodiversity means that the primary objective of any activities, if needed, are for natural processes to take over. It includes leaving nature to restore itself, to management through agriculture and related activities that have nature, and not economic benefits, as their main objective. Natura 2000 and National Protected Areas managed in this respect would contribute to the target.

4 A bird species is considered secure when none of the IUCN Red List criteria for threatened (Critically Endangered (CR), Endangered (EN) and Vulnerable (VU)), or not secure status (Near Threatened (NT), Declining and Depleted) applied at EU-level are met. The reason for proposing two different targets for reaching FCS and secure status is that a species that is "secure" is at a lesser conservation status than when in FCS.

5 Indicators for common birds and butterflies are already well established Europe-wide, or in an advanced stage of development.



# Headline targets

The headline targets below are a coherent set of actions needed to deliver the ambitious mission targets. They revolve around five axes:

1. **Enforcement of the existing legislation**
2. **Restoration of the natural environment**
3. **Addressing drivers of biodiversity loss throughout the commercial chain**
4. **Enabling consumption patterns that support policies to protect biodiversity**
5. **The funding needed to deliver the needs of biodiversity**
6. **The governance features needed to deliver this strategy**

Where there is no explicit mention of a date in the text below, it is understood that the delivery date is the end of the strategy in 2030.

When results of an action are needed well before the end of the strategy, for the strategy to be able to deliver, an earlier date is indicated.

## 1. Enforcement of the existing legislation

In the European Union (EU), sites that are nominally protected are routinely destroyed beyond recognition. The EU must put an end to environmental vandalism. For too long Member States (MS) and the European Commission (EC) have condoned much of the environmental destruction happening in the EU by different stakeholders. The EU has some of the best environmental legislation on the planet, repeatedly proven fit for purpose when correctly implemented. If the EU wants to be able to lead on the global stage, it will need to clamp down at home and enforce respect for the law. The sub-targets below will allow the EC to enforce its mandate.

### 1.1 Enforce the Birds and Habitats directives: fully protect The Natura 2000 Network and species

The EC needs to step up action against those that infringe the law. MS have taken advantage for too long of a deregulation agenda that has seen “soft implementation” tactics dominate the last two decades, with very little to show for biodiversity. The EC will need to provide the resources needed to its relevant services, in line with the unprecedented importance of the biodiversity crisis. The EC enforcement teams will need to be empowered to fast track enforcement action for all infractions of the Nature Directives.

## Establish conservation objectives and management plans for all Natura 2000 sites by 2021

MS are failing to deliver on this objective, already a target for 2020. So far, only 23 % of the Special Protection Areas (SPAs) have management plans or equivalent instruments, and only 46 % of the Sites of Community Importance (SCIs). This is clearly unacceptable, as these are the areas that have been designated for their important biodiversity value. The fact that the EU and its MS are not putting the resources necessary to even plan the management of its biodiversity is a powerful indicator as to why we are losing it at such unprecedented rates. By 2021, there should be effective management plans in place, ensuring that they contain 3 key elements: conservation objectives for all present species, measures (and resources) to achieve those objectives and monitoring systems to assess progress of the appropriate conservation measures. Their implementation must be enforced as set out above.

## Put in place a Natura 2000 surveillance system by 2025

The EC must deploy by 2025 a publicly available remote sensing system that detects unlawful land use change in close-to-real time. Such a system would help MS and the EC improve enforcement, while reducing costs associated with the controls and inspection of vast swathes of land.

## 1.2 Zero clearing of protected habitats<sup>1</sup>, within and outside EU

The Habitats Directive lists a set of protected habitat types, as well as protection status of designated Natura 2000 sites. Natura 2000 sites are routinely trashed, not to mention the protected habitats that extend beyond Natura 2000 sites; for the latter some MS argue that there is nothing they can do to prevent their destruction. If the EU is to go to the global stage and argue for “Zero Deforestation” in tropical countries, we need to show ambition at home.

For this, the EU should ensure that:

- No clear cutting occurs in protected forest types;
- Old growth forests should be protected from any sort of management;
- No ploughing is permitted of protected grasslands<sup>2</sup> types;
- No protected wetlands types are drained.

In pursuing biodiversity restoration objectives, however, MS should be allowed to clear vegetation on protected sites to reach conservation objectives. For instance, a Natura 2000 site covered in eucalyptus plantations should be allowed to be cleared in order to recover original habitats.

Environmental liability should be properly implemented and enforced to make sure that any unlawful habitat conversion is reversed, and restoration costs are borne by the responsible individual or entity.

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<sup>1</sup> By “Protected habitats” we mean both habitats listed in the Annex of the Habitats Directive, and other habitats that are inside N2000 sites and host species for which the sites have been designated.

<sup>2</sup> Grasslands include any habitat covered mainly by grasses, with little or no tree and shrub cover, and includes heathlands, pastures, etc

## Zero tolerance to illegal wildlife persecution, within and outside EU

All across the EU, wildlife is illegally killed and persecuted, contravening EU law and jurisprudence. MS need to elevate the importance of environmental and wildlife crime in particular, and put in place fines that deter effectively. MS need to comply with the strict controls enshrined in the legislation to prevent abuse. The EC needs to put an end to decades of their laissez-faire approach to unlawful derogations of the Nature Directives. It must also establish a reliable control system to ensure that the consequences of derogations are compatible with the objectives of the Nature Directives. The EU must also ensure that wildlife persecution is not merely exported outside of its borders.

## Full implementation of the biodiversity relevant *Acquis Communautaire*

MS need to fully implement the directives that have a direct link to Biodiversity, by the deadlines already established within them. These include, but are not limited to, the Water Framework Directive; the Marine Strategy Framework Directive; the Common Fisheries Policy regulations; the Maritime Spatial Planning Directive; the Environmental Impact Assessment Directive; the Strategic Environmental Assessment Directive; the Environmental Liability Directive; and the Environmental Crime Directive. The EC shall start infringement cases against any Member State that fails to deliver on their obligations. The EC should also ensure that its Action Plan on environmental compliance and governance is implemented.



Photos:  
Wolf *Canis lupus*  
©Lars Soerink

Common Greenshank *Tringa nebularia*  
©Yves Adams

False Ringlet *Coenonympha oedippus*  
©Jeroen Mentens

## 2. Restoration of the natural environment

EU MS have already made a commitment to restore 15% of degraded ecosystems by 2020<sup>1</sup>. This target of the 2020 EU biodiversity strategy will not be met. Indeed, hardly any restoration work on a significant scale has been started, and almost no MS has even produced restoration plans. With much improved science suggesting ever-growing urgency, and massive public mobilization demanding immediate action, we cannot lose more time and must get restoration work started immediately. Given the climate and biodiversity emergency, and the fact that restoration of habitats can take several years, to achieve impacts by 2030, will require work on the ground to start as early as 2021-2023.

To successfully deliver the targets above, enforce existing nature legislation, as well as the delivery of the EU's climate commitments<sup>2</sup>, BirdLife Europe believes that the future EU Biodiversity Strategy must include a crosscutting legally binding target of fundamental positive sea and land-use change for MS to restore at least an additional 15% of its territory, in hectares<sup>3</sup>. Each MS shall restore its own share, and ensure it is protected in the long term. All Member States have a responsibility to restore ecosystem functionality, whether in areas "close to pristine" status, in heavily degraded agricultural landscapes, or in destroyed sea beds. This legal instrument needs to act as a support tool to achieve the 30% natural area mission target for the EU set out above.

Restoration of future nature should be understood and planned in the context of projected climate change trajectories<sup>4</sup>. Nature-based solutions, such as protecting remaining intact natural ecosystems and ramping up efforts to restore ecosystems, will help accommodate change for biodiversity, as well as mitigate and adapt to climate change<sup>5</sup>. In concrete terms, restoration of nature would contribute to a doubling of EU carbon sinks by 2030 and improve resilience to the impacts of climate change. It can deliver socially acceptable solutions to ensure the best value for money, including for flood defences, water storage

1 <https://www.cbd.int/nbsap/about/targets/eu>

2 A recent science policy paper highlights the need to manage areas to reduce emission, so called Climate Stabilisation Areas, outside of a (30%) global network of protected areas. The paper proposes Climate Stabilization Areas covering 20 % on land and on sea: A global Deal for Nature: Guiding principles, milestones and targets. E. Dinerstein et al, 2019. <https://advances.sciencemag.org/content/5/4/eaaw2869>

3 This target shall be achieved on a 2020 status baseline.

4 2° Celsius increase as average in the world by 2040.

5 Analysis of the potential for carbon dioxide removal in the EU through nature-based approaches is limited, but studies that do exist suggest that a doubling of the EU's current sink by 2030 is within the realms of possibility: Griscorn et al: <https://www.pnas.org/content/pnas/114/44/11645.full.pdf>; Öko-Institut – Forest vision for Germany: <https://www.greenpeace.de/sites/www.greenpeace.de/files/publications/20180228-greenpeace-oekoinstitut-forest-vision-methods-results.pdf>; Analysis by Climact for the European Climate Foundation: [https://stakeholder.netzero2050.eu/?view=ghg\\_emissions&code](https://stakeholder.netzero2050.eu/?view=ghg_emissions&code)

Black-tailed Godwit *Limosa limosa* ©Yves Adams, Vilda



and purification, improved air quality, and health benefits. To ensure coherence, the EU Nationally Determined Contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC) needs to show ambition for biodiversity, as well as for climate. There is growing evidence<sup>6</sup> that functioning and biodiverse ecosystems are both more efficient as carbon stocks and less vulnerable to loss of carbon e.g. through fires, pest outbreaks and storm damage.

Priority areas for restoration in the EU should be defined by two complementary criteria. Restored areas should:

- a) Improve the coherence and connectivity of the Natura 2000 network by restoring, through fundamental positive land and sea use change, areas both inside Natura 2000 sites and key areas outside of the network (e.g. corridors and buffers). The main focus should be to restore natural processes. In principle, these landscapes should be kept free of human intervention<sup>7</sup> or managed, if need be, primarily for biodiversity. A well connected and coherent network of Natura 2000 areas is more resilient, allowing species to better adapt and cope with climate change impacts and effects.
- b) Focus on ecologically degraded habitats which have a big potential for climate mitigation (carbon sinks/stores) and adaptation (mainly water retention). We will need to use any opportunities for carbon sequestration, hence the EU should focus specifically on restoration of ecosystems which have the biggest "climate potential".

Any restoration initiative needs to ensure the quality of restored habitats, and focus on ecological functionality and connectivity. Not all improvements should be considered as "restoration". Favourable Conservation Status, as set in the Habitats Directive, must determine the quality of habitat restoration.

The EU needs to ensure that a majority of citizens have access to nature. Where EU policies actively undermine restoration and hence the achievement of climate and biodiversity objectives - for example EU incentives to grow bioenergy crops or harvest forest biomass for energy and fisheries subsidies - they should urgently be revised.

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<sup>6</sup> Hicks, C., et al., 2014. The relationship between biodiversity, carbon storage and the provision of other ecosystem services: Critical Review for the Forestry Component of the International Climate Fund. Cambridge, UK. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/331581/biodiversity-forests-ecosystem-services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/331581/biodiversity-forests-ecosystem-services.pdf); <https://esajournals.onlinelibrary.wiley.com/doi/10.1002/eap.1749>

<sup>7</sup> Except for the creation of sustainable recreational and tourism infrastructure, so as to be able to exploit the potential of these landscapes for education and recreational purposes



The EU should therefore achieve the following targets:

**1. Restoration for biodiversity of 67 million hectares<sup>8</sup> of natural habitats on land in the EU for biodiversity, with a high potential of carbon sequestration and water retention.**

On land, there is growing evidence<sup>9</sup> of the potential for restoring natural habitats that represent significant carbon sinks and stocks, with peatlands being the most important ones, but also old growth forests, permanent grasslands, wetlands, sea grass beds and kelp forests<sup>10</sup>. In order to reap the largest benefits both for biodiversity and climate mitigation and adaptation efforts, MS need to restore a set of habitat types with “high climate potential” to good quality.

MS will need to deliver a plan and map of where they intend to restore land, and present their prioritisation plan within 1 year of adoption of this strategy. Implementation of these plans should start no later than 2022. To reach this target, all MS will need to restore their share of 15% of their own land area. The contribution of 15% restoration to the Mission target on 30% managed for biodiversity will be assessed by 2025.

**2. Restoration on land should prioritise:**

- a) Old growth forests: Member States should set aside forests so that they can become old growth<sup>11</sup>;
- b) Biodiversity rich grasslands (scrublands, Mediterranean maquis, heathlands, etc);
- c) Peatlands;
- d) Wetlands, in particular floodplains and coastal areas.

**3. Restoration of 15% of EU Member States’ sea areas, by designating them as permanent “no take zones”, with regulated access<sup>12</sup> to restore and recover oceanic life**

At sea, there is also growing evidence of the benefits that marine restoration of the seabeds and water column can bring both for biodiversity<sup>13</sup> and climate action<sup>14</sup>. Active restoration of seabeds must be pursued where carbon rich ecosystems were historically abundant (i.e. Posidonia beds, shellfish reefs, etc). But to ensure that these recover, and that active restoration efforts are not in vain, the EU should ban destructive activities on 15% of the Member States Exclusive Economic Zones – that is 375 million hectares of sea area. These must prioritise fish recovery areas and nursery grounds. Concrete actions on how to minimise fisheries impacts on oceans are covered in the Marine Extraction section, below<sup>15</sup>.

**4. Restoration of 15% of total length of rivers to natural flowing regime**

Rivers need their own target for restoration, as the types of ecological restoration

8. 15% of 4.479.968 km<sup>2</sup> of EU land area. <https://www.cia.gov/library/publications/resources/the-world-factbook/geos/ee.html>

9. See for example recent map produced by RSPB/BirdLife UK analysis overlap between biodiversity areas and carbon stocks: <https://rspb.maps.arcgis.com/apps/Cascade/index.html?appid=2b383eee459f4de18026002ae648f7b7>

10. It is estimated that land restoration, and reduced and avoided degradation that increases carbon storage or avoids greenhouse gas emissions in global forests, wetlands, grasslands and croplands could provide more than one third of the most cost-effective greenhouse gas mitigation activities required by 2030 to keep global warming to below 2°C. IPBES (2018): Summary for policymakers of the assessment report on land degradation and restoration of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services

11. Some management might be needed early in the plans, in particular to deal with IAS or to convert mono-culture plantations into naturally occurring European forests.

12. Excluding fishing, off-shore windfarms, anchoring, sea mining, etc

13. <https://www.nature.com/articles/nature13022>

14. <https://www.pnas.org/content/114/24/6167>

15. <https://science.sciencemag.org/content/362/6421/1403>

foreseen on land and sea do not cover the linear nature of their ecological functionality. Rivers across the EU need to be brought back to life –from high-potential ecosystems (such as the Danube Delta) to the already heavily transformed rivers, for instance in Belgium. BirdLife Europe therefore calls for MS to restore 15% of the length of their rivers to natural flowing regimes, defined at catchment level with a 2020 baseline. MS should favour as far as possible whole watershed reconnection, in particular sea to fresh water connectivity<sup>16</sup>.

16. <https://www.nature.com/articles/s41586-019-1111-9>

## 3. Addressing drivers of biodiversity loss throughout the commercial chain

We know the key drivers of biodiversity loss: Intensive production of food and agricultural commodities, unsustainable extraction of sea products, and untraceable trade routes are decimating European and global environments. The EU has an opportunity to address these issues as a whole and we know biodiversity needs to be fully integrated into those sectors driving its loss. We cannot afford to lose another decade if we are to bring the transformational changes we know are needed. The Biodiversity Strategy needs therefore to address the following elements:

### 3.1 Make EU agricultural production compatible with a biodiverse land

The EU must ensure that its agricultural land, 48% of its territory<sup>1</sup>, becomes part of the solution to address the biodiversity crisis. It must ensure that farmers are supported to transition from current intensive, to extensive and diversified production practices.

#### Give space for nature: minimum of 10% of obligatory farm-level green infrastructures

Current agricultural production methods are choking the land in the EU<sup>2</sup>. Pollinators are disappearing and birds once common in the countryside are in freefall. The EU needs to make sure that farm-level green infrastructures (landscape elements such as trees, hedge rows, flower strips) are put in place throughout the countryside. This would create much needed space in which biodiversity could thrive. The EC needs to make sure that this measure is implemented by making it a condition for any EU payments. Rules would need to define “farm-level” so that 10% green infrastructures occur at a scale that is meaningful for functional agro-biodiversity<sup>3</sup>. This 10% should be free of pesticides and fertilisers; mechanical vegetation control in these areas must be timed to maximise biodiversity benefits<sup>4</sup>.

1. <https://ec.europa.eu/agriculture/sites/agriculture/files/statistics/facts-figures/land-cover-use.pdf>

2. <https://www.sciencedirect.com/science/article/pii/S0065250416300204?via%3Dihub>

3. Studies from across Europe show that if a minimum of 10-14% of agricultural land were to be non-productive, then birds, and thus other wildlife, are likely to recover.

[https://www.bfn.de/fileadmin/MDB/documents/themen/landwirtschaft/flaechenstilllegung\\_langfassung.pdf](https://www.bfn.de/fileadmin/MDB/documents/themen/landwirtschaft/flaechenstilllegung_langfassung.pdf); <https://www.sciencedirect.com/science/article/pii/S0167880914001261>;

It is the minimum, as at landscape level, 26-33% may be required for landscape-level recovery. <https://zslpublications.onlinelibrary.wiley.com/doi/abs/10.1111/acv.12386>

4. <https://www.nature.com/articles/s41598-019-45854-0>

## Reach 30% organic agricultural production.

Organic production can be beneficial for biodiversity if done in the right way<sup>5</sup>, and is the only type of “sustainable” production that has EU legislation backing it. The EU needs to set out a clear objective and the underlying policies to achieve it, as well as incentivise the adoption of sustainable organic farming practices. The EC will need to make sure that controls are put in place on the concrete details of its deployment, as some intensive organic production, in the wrong places, can be as damaging for biodiversity as traditional intensive farming practices.

## Achieve zero soil erosion and degradation on agricultural land

MS have shown considerable lack of political will to address the issue of soil erosion. In a context where climate change will increase this risk, and given the urgency of the current biodiversity crisis, the EU ought to introduce obligations for MS to protect their soils, so that soil issues are integrated into the EU environmental acquis, the CAP conditionality and national legal frameworks.

## Pass legislation to achieve zero-net-land sealing

The EU needs legislation making sure that land is efficiently used, and that brown-field sites are repurposed so they can be reused, or restored into natural habitats.

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5. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0216009#pone-0216009-t001>



## 3.2 Make EU extraction of fish and seafood compatible with oceanic life

### Ban destructive fishing practices

To restore and recover the oceans, the EU must commit to fishing practices that do not harm biodiversity<sup>6</sup>. For this, the EU should establish the following objectives:

- a) Zero bycatch of endangered, threatened and protected species by all EU fishing vessels, including outside of the EU. This includes species protected under international conventions, and EU legislation<sup>7</sup>.
- b) Ban non-selective fishing gear (including bottom trawling, and deep-sea trawling). This is important to eliminate bycatch of non-target fish species, and make sure that fish populations and seafloors are restored<sup>8</sup>.
- c) No fishing of fish stocks that are not scientifically assessed
- d) Fully disclosed fisheries with 100% monitoring and control of all fishing vessels (including Remote Electronic Monitoring e.g. through cameras, GPS loggers). Automatic confiscation of fishing vessels and loss of fishing licence for operating without activated GPS, or without valid permit.

### Limit forage fish catch to no more than 2/3 of long-term maximum forage fish biomass

Research suggests that, as a general global rule, a third of the peak long term maximum stock size of forage fish should be left for birds each year to ensure seabird populations remain stable. For species at the bottom of the food chain, established Maximum Sustainable Yields are often smaller than one third of the total fish population, and are

<sup>6</sup> <https://ipbes.net/models-drivers-biodiversity-ecosystem-change#exploitation>

<sup>7</sup> [https://www.researchgate.net/profile/Oliver\\_Yates/publication/268176873\\_Global\\_seabird\\_bycatch\\_in\\_longline\\_fisheries/links/54a1532c0cf256bf8baf6745/Global-seabird-bycatch-in-longline-fisheries.pdf](https://www.researchgate.net/profile/Oliver_Yates/publication/268176873_Global_seabird_bycatch_in_longline_fisheries/links/54a1532c0cf256bf8baf6745/Global-seabird-bycatch-in-longline-fisheries.pdf)

<sup>8</sup> <https://www.int-res.com/articles/esr2009/9/n009p049.pdf>; <https://www.sciencedirect.com/science/article/abs/pii/S0006320709001001>; <http://www.fao.org/3/a-bh048e.pdf>

Montagu's Harrier *Circus pygargus* ©Yves Adam, Vilda



thus not enough to sustain populations of predators higher in the trophic chain, including seabirds<sup>9</sup>. BirdLife calls for the EU to establish as an objective that at least one third of forage fisheries are left in the sea for ocean predators.

### **Recover the historical range of top predators, including seabirds, as indicators for recovery of marine food chains**

Top predators, such as seabirds, are an important component of marine ecosystems foraging over large areas of sea and feeding on a variety of species within marine food chains. There is evidence that top predator populations and reproduction are regulated by environmental factors, specifically prey abundance. The range and changes in the population of top predators, particularly those that are specialist feeders and are thus highly dependent on the availability of specific prey species, can reveal the effects of pressures such as climatic change or overfishing. As umbrella species, actions to conserve top predators have benefits for wider marine biodiversity. Seabirds can be a particularly good indicator of oceanic health because they are generally more visible and therefore easier to study than other marine top predators.

### **Establish a deep-sea mining moratorium**

Deep-sea mining is an activity with incalculable risk for the marine environment and thus incompatible with the precautionary principle. It is undisputed among researchers that its extraction methods lead to severe, likely irreparable damage to the vulnerable deep-sea ecosystems. Consequently, the EU should establish a deep-sea mining moratorium to counter the globally increasing efforts for the exploitation of deep-sea marine resources.

## **3.3 Make EU aquaculture sustainable and independent from wild-caught fish**

EU aquaculture production will need to be made sustainable and independent of wild-caught fish. MS will need to carefully plan aquaculture development, in particular with respect to marine protected areas, and together with other marine activities (such as shipping, offshore energy, etc) through careful spatial planning. Development of extensive aquaculture in inland wetlands should be prioritised, as these types of production are recognised as beneficial to biodiversity.

The EU should make aquaculture production independent from wild-caught feed. The EU should set as an objective that all fish raised through aquaculture are never fed with wild-caught fish: acceptable alternatives are vegetal material, food waste, insects, or intermediate aquaculture products. In that sense, the EU should invest in the development of more sustainable aquaculture practices, including integrated multi-trophic aquaculture<sup>10</sup>.

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<sup>9</sup> Research suggests that, as a general global rule, a third of the peak long term maximum stock size of forage fish should be left for birds each year to ensure seabird populations remain stable. <https://science.sciencemag.org/content/334/6063/1703>

<sup>10</sup> Integrated multi-trophic aquaculture (IMTA) involves the integrated cultivation of fed species together with extractive species (marine invertebrates and/or algae) that feed on detritus from the fed species. This conversion of particulate waste and dissolved waste into secondary raw materials addresses key environmental impact concerns related to open-water systems.

## 3.4 Achieve zero-pollution in the EU

There are a number of environmental pollutants that are particularly damaging for biodiversity. The Biodiversity strategy should address these.

### 1. Drastically reduce use of pesticides in agricultural landscapes

The EU already has legislation aimed at the reduction of risks and negative impacts of pesticide use, the Sustainable Use Directive. This Directive is mostly not implemented, and the EC needs to start taking enforcement actions across the board.

BirdLife Europe suggests specific targets:

- Reduce the average number of pesticide applications per hectare and the level of the Harmonised Risk Indicator by at least 30% from a 2020 baseline, by 2030<sup>11</sup>.
- Ensure that rigorous pre-approval pesticide test procedures are in place for wildlife, including birds and pollinator insects.
- Ensure that at least 10% of every farm is free from pesticide use, as a measure to support 31.1.1 pesticide-free farm-level green infrastructures.
- Ban the sale by EU based entities of pesticides, licences and patents on chemicals that have been banned in the EU, so that no one can profit from harming biodiversity in countries that do not have adequate (or any) pesticide regulation.



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### 2. Achieve full nutrient balance at farm level

Excess in nutrient loads in the environment are a big problem for biodiversity on land and water ecosystems. The EU needs to put in place a system that halts the discharge of sources of eutrophication. For this, the EU needs to put in place a system of controls that ensures that there are no excess nutrients leaking outside of the farm system.

11. The EU is still developing a Harmonised Risk Indicator, however, this target should ensure that both, the number of applications, and the toxicity of the pesticide are reduced. Studies show that such a reduction would not reduce yields: <https://www.nature.com/articles/nplants20178>

### 3. Attain zero contribution to marine plastic pollution from the EU<sup>12</sup>

Although most sources of marine litter are land-based, shipping also has an important role to play in waste discharge. Plastic waste at sea generated by cargo loss during transport, passengers and crew on vessels, and commercial and recreational fisheries (e.g. gear loss)<sup>13</sup>, are damaging biodiversity: birds and other marine animals get entangled in old nets, feed on plastics, and starve to death<sup>14</sup>. The EU should make sure that existing measures tackling waste from shipping are enforced, and where gaps exist, legislation is adopted that will ensure zero contribution to marine plastic pollution from the EU.



Austria ©Sebastian Pichler, Unsplash

## 3.5 Ensure EU trade does not harm nature

The EU must ensure that its trade is free of harm to nature.

### 1. Establish clear liability rules for importers, processors and retailers to clean supply chains of agricultural commodities through legislation.

Clear liability rules, similar to those established in the Timber Regulation, should be extended to all agricultural commodities to prevent natural habitats destruction in and outside of the EU, such as with tropical forests. These should ensure:

- a) Full legality and transparency of the supply chain of all agricultural commodities;
- b) Zero conversion of high-carbon and high-biodiversity habitats;
- c) Zero embedded habitat clearing;
- d) No overfished stocks from outside the EU enter the EU market;
- e) Imported food and agricultural commodities follow the same or better production standards than those in the EU.

12. For further details, see BirdLife Europe position on "Tackling Marine Litter for Ocean Protection", Sept 2019.

13. <https://www.annualreviews.org/doi/pdf/10.1146/annurev-marine-010816-060409>

14. [http://www.marineornithology.org/PDF/32\\_2/32\\_2\\_187-189.pdf](http://www.marineornithology.org/PDF/32_2/32_2_187-189.pdf)

## 2. Zero illegal wildlife EU trade

The EU has in place an Action Plan to 2020 addressing illegal wildlife trade. The EU Biodiversity Strategy must ensure that any follow-up of the plan makes sure that illegal wildlife trade, within the EU and between EU and non-EU countries, is effectively eliminated.

The EU should also push for a revision of CITES mechanisms that make sure that any legal trade of wildlife is narrowly defined, and strictly complied with. The EU should make sure that CITES mechanisms avoid any over extraction and pressure on wildlife at their source, and that it supports non-extractive uses of natural resources, including wildlife, for the socioeconomic development of local communities.

## 3. Blacklist and effectively control the worst Invasive Alien Species

The EU achieved its objective to address the problem of Invasive Alien Species (IAS) by adopting legislation that bans listed species from entering the EU. Initial processes to implement the regulation are showing that efforts are not being done at the scale the problem requires. The EU needs to commit to massively speed up the listing of potentially harmful species that the science determines<sup>15</sup>. The EU should therefore blacklist the worst 600 IAS by 2025, and have blacklisted the 900 worst species by the end of the strategy. MS should have in place all necessary measures to implement the Regulation by the end of 2030.

## 3.6 Strive to reform international trade rules in line with environmental imperatives

The EU should strive to make WTO rules compatible with addressing the biodiversity and climate crises. The EU should also establish ways to better assess biodiversity impacts of trade deals, and better integrate assessment findings, in a comprehensive and systematic manner<sup>16</sup>.

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15. Carboneras et al. 2018 <https://besjournals.onlinelibrary.wiley.com/doi/10.1111/1365-2664.12997>

16. IEEP "Trade liberalisation and Biodiversity", 2018, reviews the EU's existing SIA methodologies for assessing biodiversity impacts of trade. <https://ieep.eu/publications/trade-liberalisation-and-biodiversity>

## 4. Enabling consumption patterns that support policies to protect biodiversity

Most of the above targets will be extremely difficult to achieve unless the EU addresses consumption patterns. Material consumption is covered by the Circular Economy Strategy, and energy consumption is targeted by climate and energy policy. The EU must now also focus on consumption of biological resources, which are currently unaddressed and of overwhelming negative impact on biodiversity<sup>1</sup>. Consumption of animal products drives intensification of both agriculture and fisheries. Reduction in consumption of all types of animals needs to happen in parallel to avoid leakage, meaning that consumption of both land-based and sea faring animals needs to be reduced. We need a policy in place that drives less and wiser consumption. Any such drive for a change in consumption patterns should ensure equity and healthy diets for all EU citizens. This change should not be pursued through any bans or direct taxation on types of foodstuffs consumed, but through, for example, enabling policies, subsidies reform, labelling rules, green public procurement, education, regulating advertising, etc. to help transition to better diets.

### 50% reduction in food waste

The current global food system results in huge amounts of waste, and in the EU around 20% of food produced, or 47 million tonnes gets lost or wasted<sup>2</sup>. The EU should commit to a binding target of cutting food waste by 30% by 2025, and 50% by 2030, from farm to fork at Member State level. This means that it should include not just retailer and consumer food waste, but also food wasted at the primary production, manufacturing and distribution levels<sup>3</sup>. Ensuring that food that is produced is not wasted would save land<sup>4</sup>, water and other inputs as well as saving 3.3 billion tonnes of greenhouse gases emitted to the planet's atmosphere.

### 50% reduction in meat and dairy consumption in the EU

Consumption is one of the most important drivers of biodiversity loss<sup>5</sup>. In particular, what, and how much we eat or consume directly affects what, and how much is produced. The environmental impact of intensive livestock production on biodiversity is immense in terms of the land and water footprint, greenhouse gas emissions and other pollutants<sup>6</sup>. Recent studies have concluded that meat and dairy need to be cut dramatically to stay within planetary limits<sup>7</sup>.

1. [https://www.birdlife.org/sites/default/files/attachments/birdlife\\_europe\\_consumption\\_paper\\_atf\\_adopted\\_may\\_2019\\_final.pdf](https://www.birdlife.org/sites/default/files/attachments/birdlife_europe_consumption_paper_atf_adopted_may_2019_final.pdf)

2. [https://ec.europa.eu/food/safety/food\\_waste/stop\\_en](https://ec.europa.eu/food/safety/food_waste/stop_en)

3. EU legislation should also include in its definition of food waste food wasted at the level of primary production.

4. The FAO estimates that it takes an area greater than the size of China to grow the food wasted or lost [https://champions123.org/wp-content/uploads/2018/09/18\\_WP\\_Champions\\_ProgressUpdate\\_final.pdf](https://champions123.org/wp-content/uploads/2018/09/18_WP_Champions_ProgressUpdate_final.pdf)  
In Europe, a 60% reduction in food waste by 2030 would reduce Europe's land-use burden by an area larger than Croatia. [https://eeb.org/publications/151/fact-sheets/93275/fs9\\_reducing-food-waste\\_finaleu.pdf](https://eeb.org/publications/151/fact-sheets/93275/fs9_reducing-food-waste_finaleu.pdf)

5. [https://www.birdlife.org/sites/default/files/attachments/birdlife\\_europe\\_consumption\\_paper\\_atf\\_adopted\\_may\\_2019\\_final.pdf](https://www.birdlife.org/sites/default/files/attachments/birdlife_europe_consumption_paper_atf_adopted_may_2019_final.pdf)

6. BirdLife Europe Position Paper 2019: Feeding the world whilst saving biodiversity—policy asks on diet, bioenergy and food waste.

7. [http://www.risefoundation.eu/images/files/2018/2018\\_RISE\\_LIVESTOCK\\_FULL.pdf](http://www.risefoundation.eu/images/files/2018/2018_RISE_LIVESTOCK_FULL.pdf);

<https://eatforum.org/eat-lancet-commission/eat-lancet-commission-summary-report/>;

<https://www.theguardian.com/environment/2018/sep/15/europe-meat-dairy-production-2050-expert-warns>.

Similarly, A 2016 paper in the Journal Food Policy, suggests that that a 50% reduction in the consumption of beef (and mutton) will be required if the EU climate targets are to be met

### 40% reduction in fish and seafood eaten in the EU

Consumption of all types of proteins need to be brought down to sustainable and healthy levels, including from fish and sea food. Most MS recommend to eat about 300g of fish per week and per inhabitant, for a healthy and balanced diet. Current average EU consumption of fish and seafood is almost 500g on average per inhabitant per week. We thus call for the EU to set a 40% consumption reduction target for fish and seafood<sup>8</sup>, promoted by enabling policies.

### 30% organic consumption in the EU

As a support mechanism to the objective of sustainable organic farming practices, the EU needs to ensure that demand follows the increased offer. The EU should therefore commit to a target to reach 30% organic consumption, and roll out enabling policies to that end.



Great Tit *Parus major*  
©Noble Brahma, Unsplash

8. Most MS recommend eating ~300g fish/week; which amounts to about 15.6 kg/inhabitant/year <https://ec.europa.eu/jrc/en/health-knowledge-gateway/promotion-prevention/nutrition/food-based-dietary-guidelines>

## 5. The funding needed to deliver the needs of biodiversity

We have reached the point where the world's health, and its ability to function as we know it, is entering the emergency zone. Consequently, the EU should act now, and mobilise enough funding to face the crisis. To deliver the biodiversity objectives set out above, we call for the EU to:

### 5.1. Deploy €21 billion per year for management of existing Natura 2000 Network

The EU will need to ensure that €21 billion/year are immediately deployed from the EU budget for managing the existing Natura 2000 Network.

To account for inflation, this should be increased to €30 billion/year in 2030 to manage the existing network, and be adapted proportionally to the management needs of the enlarged N2000 network at sea. As we currently stand, this should be divided as follows:

- a) €15 billion/year deployed from the EU budget for land-based N2000<sup>1</sup> management
- b) €5 billion/year should be deployed by MS from their national budgets for land-based N2000 management.
- c) €1 billion/year from the EU budget for marine-based N2000 network management.

### 5.2. Mobilise €150 billion for restoration, as a minimum, in the 10 years to 2030

In order to activate the deployment of nature-based solutions that support biodiversity restoration, and carbon and water storage, the EU needs to commit to mobilise €150 billion during the 10 years of the Strategy<sup>2</sup>, to 2030. This should come from both public and private sources. Seed funding from public sources will need to be made available right at the start of the strategy to ensure that enough private funds are also made available. Possible sources can include EU and MS funding, as well as insurances, EU Invest, and funds raised from Emission Trading schemes, and Carbon taxes. Restoration can happen in many ways – with heavy interventions, or just by letting natural processes take over. In most cases, some intervention will be needed in order to fast-track those natural processes. This amount is therefore proposed as the minimum that would be needed to restore 15% of EU land.

### 5.3. Secure 50% of External Financing Instruments to address global environment needs

The EU needs to align its contribution to maintain and recover biodiversity outside of its borders to its own Agenda 2030 for Sustainable Development. Only by doing so, can the

1. [https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-life-swd\\_en.pdf](https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-life-swd_en.pdf)

2. This has been calculated from 67 million ha x 2500€ (of half the average price/ha in EU). The thinking here is that if land is to be bought for restoration, the first land that will go will be on the cheap side.

EU successfully address the biodiversity and climate challenges and promote inclusive sustainable development for Europe and its partner countries. As a global player, the EU has a responsibility to act and contribute to reversing these trends.

We therefore recommend that the EU dedicates half of its future External Financing Instruments (EFIs) to address biodiversity and climate challenges<sup>3</sup>. Biodiversity and climate priorities should be prominently supported through future geographic programmes, as well as through dedicated thematic support.

#### **5.4. Ensure no public subsidies and investments, by the EC and MS, are spent on activities that are harmful to biodiversity**

As we have seen above, the current environmental crisis we are facing will need to be supported by substantial financing if we are to address the current challenges of biodiversity and climate collapse<sup>4</sup>. We cannot afford to have such efforts be overwhelmed by activities that harm nature. The EU must therefore make sure that that no public subsidies nor investments are harmful to biodiversity. These should include the scrapping of perverse incentives such as current the Common Agriculture Policy (CAP), and bio-energy policies.

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3. Based on [http://awsassets.panda.org/downloads/why\\_nature\\_matters\\_mff\\_joint\\_statement\\_25\\_04\\_2018.pdf](http://awsassets.panda.org/downloads/why_nature_matters_mff_joint_statement_25_04_2018.pdf)

4 See BirdLife International's Mainstreaming position here: [www.birdlife.org/post2020](http://www.birdlife.org/post2020)



## **5.5. Make mandatory biodiversity reporting on all publicly listed private funding**

In a similar way, publicly listed private funding needs to contribute its fair share to achieving a liveable world. As such, all publicly listed firms and funds should have to report on the risks of their investments to biodiversity. The EU should blacklist investments that are considered high risk, such as agriculture and forestry production on recently converted natural habitats.

## **6. The governance features needed to deliver this strategy**

The EU wants to lead global efforts to address the biodiversity and climate crises. For this, it needs to ensure that the governance structures required for the world to change to a truly sustainable model are in place. All institutions involved - the EU as a whole, Member States, the European Parliament, and the European Commission will need to come together to ensure a robust governance system is in place. For the EU to show leadership in the global arena, it will need to:

### **1. Make the objectives of the future Biodiversity Strategy legally binding**

Whenever the EU has tried to make progress through placing soft structures to address environmental destruction, it has failed to achieve its objectives. In order to show commitment and provide assurances that this time it is ready to take the crises seriously, to “grab the bull by the horns”, Member States will need to be legally obliged to meet this set of ambitious objectives. In the same way that the EU has reached agreement and committed to a Climate Law, we now need a similar level of commitment to a “Biodiversity Law”. Detailed analysis of how to distribute and share the efforts to achieve the objectives presented here will need to be analysed in detail. In any case, they should be legally enforceable at the MS level.

### **2. Set trajectories and milestones to reach the set objectives**

The EC and its Member States need to learn from past failures. The EU cannot allow for the future biodiversity strategy to 2030 to fall into the same traps that made the past strategies fail repeatedly. Clear trajectories need to be defined to reach biodiversity objectives, and milestones along the way need to be firmly set.

### **3. Ensure all Commission services are responsible for delivering the strategy**

Even though these sorts of strategies are presented as owned by the EC as a whole, the reality is that very often objectives that are set by the leading department are completely

disregarded by other relevant departments of the EC. This often leads to an incoherent policy framework that sabotages the achievement of the objectives. The EC needs to put in place a mechanism that ensures equal responsibility in delivering goals across all departments.

#### **4. Elevate importance of this strategy within EU's Political institutions**

To ensure that the EU is making progress to deliver these goals, and ensure the transparency of the process, EU institutions need to be further involved in assessing progress by:

- a) Ensuring the EC submits a yearly report to the EP on the progress in delivering this strategy, as is currently the case in the "Energy Union". A yearly debate should be held on the progress made;
- b) The Commission should also submit its yearly report to the European Council, which should hold a discussion at Heads of State level;
- c) The European Environment Agency (EEA) should deliver ongoing real-time information on land-use change through remote sensing applications.

#### **5. Enshrine a ratchet-up mechanism for ambition**

MS and the EC should commit to increase the ambition in the Strategy if they find the proposed objectives are not delivering fast enough. Based on the annual discussions above, the EC should make proposals for better implementation or stricter targets as soon as implementation gaps are detected.

#### **6. Provide adequate capacity at EC and MS level to enforce nature laws**

In order to deliver on the enforcement requirements set above, the EC and MS need to urgently address an adequate increase in staff and financial capacities of nature conservation authorities and institutions to ensure the implementation of current and future strategies, and ensure enforcement of EU nature laws.

#### **7. Ensure EU research funding is earmarked for biodiversity monitoring**

The importance of monitoring is widely understood to be very important – unless MS know what they have in the way of biodiversity, and what is changing, they will not know if the policies they put in place work. Monitoring needs in the EU are, however, not appropriate across the EU. MS often do not incorporate biodiversity monitoring needs into their rolling budgets, and often therefore scramble to put together the necessary resources even to comply with their reporting obligations. MS should commit to earmarking enough national funding to deliver on their reporting obligations, including enough money to carry out biodiversity monitoring schemes.

#### **8. Empower civil society organisations**

The EU should empower its civil society as a central part of a thriving democracy. The future Biodiversity Strategy should explicitly mention the positive role that civil society plays in its role as an effective watchdog in the delivery of its objectives, and in ensuring

the transparency of its implementation. The EU should make sure that funding is systematically available to civil society in order to fulfil that role.

The EU must guarantee the right to information, participation and justice for all. For that, the EU must end its own non-compliance with the Aarhus Convention and also start preparatory works for a proposal for a new Directive to provide access to justice in environmental matters in national courts.

## **9. Pursue ambition in global fora**

### **9.1 A robust treaty for the High Seas**

In order to address coherence in the global efforts to ensure a sustainable ocean, and among other goals, ensure that a reduction of fishing intensity in EU waters is not merely pushed off into the international High Seas, the EU should lead on ambitious action at UNCLoS. There is an urgent need to set up a Court System that governs the law in High Seas, and provides the needed financing mechanism.

### **9.2 EU to pursue a strong CBD agreement**

The EU should pursue a strong CBD agreement that incorporates as much as possible the objectives of the EU strategy, as foreseen in this paper. Pushing for a strong ambitious foundation within the EU strategy will galvanise the global community by showing environmental leadership.



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