



NAT/786
EU Biodiversity Strategy for 2030

OPINION

European Economic and Social Committee

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions

EU Biodiversity Strategy for 2030 – Bringing nature back into our lives
[COM(2020) 380 final]

Rapporteur: **Antonello Pezzini (IT-I)**

Co-rapporteur: **Lutz Ribbe (DE-III)**

Referral	European Commission, 17/06/2020
Legal basis	Article 304 of the Treaty on the Functioning of the European Union
Bureau decision	21/01/2020
Section responsible	Agriculture, Rural Development and the Environment
Adopted in section	31/08/2020
Adopted at plenary	18/09/2020
Plenary session No	554
Outcome of vote (for/against/abstentions)	209/5/4

1. **Conclusions and recommendations**

- 1.1 The EESC welcomes the Commission's efforts to develop a Biodiversity Strategy for 2030 as one of the paths towards the European Green Deal and the global biodiversity framework proposed by the Convention on Biological Diversity (CBD).
 - 1.1.1 At the same time, it regrets that the continued recommendations of the European Court of Auditors for a more timely application of biodiversity policy have not been taken into account.
- 1.2 In the EESC's view, the biodiversity strategy is the way forward in putting Europe's biodiversity at the heart of the post-COVID-19 recovery for the benefit of people, the climate and the planet.
- 1.3 Efforts to protect remaining natural resources need to be significantly increased in the EU, through sustained awareness-raising and communication campaigns targeting society and in particular young people, highlighting the benefits of protection measures.
- 1.4 To this end, the EESC considers it necessary, in agreement with the Commission, to increase the size of protected areas, in particular strictly protected areas, limiting the impact on agriculture and forestry as far as possible, although this will in no way be sufficient to halt the decline in biodiversity.
- 1.5 This is why the EESC believes that there needs to be a significant increase in efforts to restore habitats and combat species decline caused mainly by poor implementation of the legal framework and insufficient funding for the necessary measures.
- 1.6 The EESC believes that it is vital to highlight the importance of ecological connectivity and that, in this regard, a trans-European nature protection network needs to be set up to remedy the lack of methodology in the Habitats Directive.
- 1.7 The EESC recognises that, to achieve the recovery objectives, new, legally binding targets and sufficient independent funding are required. However, the measures taken voluntarily must also be encouraged.
- 1.8 The EESC regrets that the new financial plan 2021-2027 contains no sign of full, effective, consistent integration of biodiversity, and considers this to be a worrying indication that there are – yet again – significant discrepancies between words and actions. This is also clear from the various reports of the Court of Auditors published during the last two years on the incompatibility of agriculture, climate and biodiversity policies.
- 1.9 The EESC stresses that farmers and forest owners cannot be expected to bear the cost of protecting biodiversity. Rather, providing this "public good and value" should become a useful source of income for them. It considers that the new economic recovery plan could include specific focus on this issue with investment in staff and resources to protect the content of the strategy.

- 1.10 The EESC considers it essential that some parts of the protected areas should be subject to strict protection (with non-intervention management). Only then can pure (and not "managed") natural processes take place.
- 1.11 The EESC notes that the target of making 10% of land priority areas in the agricultural sector is not reflected in the CAP reform proposal currently under discussion, which only mentions a "minimum percentage" without specifying a figure. The Committee recommends that any objective decided on should be realistic and shared.
- 1.12 The EESC is very pleased to see green infrastructure being strengthened, and calls on the Commission and the Member States to develop and implement a coherent green infrastructure strategy.
- 1.13 The EU should make trans-European networks for green infrastructure (TEN-G) an investment priority and provide them with adequate, targeted funding.
- 1.14 The EESC calls on the Commission to draw up a strong and comprehensive strategy for forests and the forest sector.

2. **Background**

- 2.1 The biodiversity strategy, understood as the variety of life on Earth – including ecosystems, communities, species and genetic resources – is a prerequisite for sustainable wellbeing and human wellbeing. It is a resource in itself and provides society with a wide range of essential ecosystem services, from supply of food and fresh water to pollination and protection from flooding. In addition to purely physical considerations, there are also ethical and moral reasons for protecting biodiversity.
- 2.2 EU action in the field of biodiversity is based on a number of articles of the TFEU:
- **Article 4(2)(e)**, which gives the EU shared competence in the field of the environment;
 - **Article 11**, which includes environmental protection requirements;
 - **Article 191**, which governs EU policy on the environment.

In addition, the EU is a party to the **United Nations Convention on Biological Diversity**, signed in Rio de Janeiro in 1992¹.

- 2.3 In secondary law, the EU has several legal acts for protecting and sustainably managing natural habitats and endangered species and for helping to incorporate biodiversity into EU policy and action.

¹ [The Convention on Biological Diversity](#).

- 2.4 Of particular importance is the **Natura 2000** network, an EU-wide network of protection areas established by the **Habitats Directive**², which also includes the **Special Protection Areas** (SPAs) established under the **Birds Directive**³; the **Marine Strategy Framework Directive**⁴ and the **Regulation on invasive alien species**⁵.
- 2.5 However, despite the existing legal instruments and the many political pledges to halt the loss of biodiversity, it is under serious threat:
- as early as 1998 an EU biodiversity strategy was presented, and in 2001 EU heads of state and government committed themselves under the Gothenburg strategy to halting biodiversity loss – which had already accelerated alarmingly in Europe – by 2010 and to restoring habitats and natural systems within the same timeframe;
 - in 2006, the Commission presented a biodiversity action plan⁶, comprising 160 measures, for reaching the target set for 2010. However, that target has not been met owing to persisting clear gaps between aims and reality – something the EESC has repeatedly criticised in many opinions;
 - in May 2011, following the Convention on Biological Diversity, which stressed the need to increasingly raise public awareness of the benefits of conserving biodiversity (Article 13), the EU presented another biodiversity strategy containing measures that were very similar to the previous strategies and the various EU environmental action programmes that had been adopted in the meantime. This strategy should have put an end to biodiversity loss and ecosystem service degradation in the European Union by the new deadline of 2020;
 - in 2017, the Commission adopted an Action Plan to help Member States preserve species and habitats: 15 actions to be carried out by 2019 to implement the Nature Directives.
- 2.6 All the EU biodiversity programmes have set very ambitious targets, which the EESC has always supported. However, the results have been too limited. As a consequence, almost a quarter of wild animal and plant species in Europe are currently at risk of extinction, insects and pollinators are in rapid decline and ecosystem conditions have mostly deteriorated to such an extent that they are no longer able to fully provide their precious services. These situations of degradation are leading to huge economic and social losses for the EU countries.
- 2.7 The five main causes of biodiversity loss – changes in land and sea use, overexploitation of natural resources, pollution, climate change and the introduction and spread of invasive alien

² Directive 92/43/EC.

³ Directive 79/409/EC, known as the Birds Directive, and Directive 2009/147/EC.

⁴ Directive 2008/56/EC.

⁵ Regulation (EU) No 1143/2014.

⁶ COM(2006) 216 final.

species – have further increased, largely obliterating the partial beneficial effects of the measures undertaken to contain the problem.

- 2.8 The EU has a great responsibility to discharge, particularly through its agricultural and fisheries policies, in which it defines the policy framework and provides billions of euro. Although it has been consistently recognised for more than 20 years that these sectors have to be reformed, hardly anything has been done to date. In this regard, the EESC draws attention to the various reports of the European Court of Auditors⁷, some of which are very recent, and regrets to note that they are almost completely ignored in the relevant Commission, Council and Parliament documents.
- 2.9 A report published in 2019 by the Intergovernmental Science-Policy Platform on Biological Diversity and Ecosystem Services warned of an increase in the rate of species extinction and a decline in global ecosystem health. The report also makes clear that biodiversity loss can be neither reduced nor halted without fundamental structural changes in society. The authors of the report expect the changes needed to come up against considerable opposition from those who benefit from the status quo. However, it is possible and necessary in the public interest to find a way out of this situation⁸. A Eurobarometer survey conducted in the EU Member States in December 2018 (over 27 000 respondents) revealed growing awareness of the significance and importance of biodiversity among EU citizens.
- 2.10 It would be appropriate to include a substantial reference to protecting biodiversity in the European Territorial Agenda, as mentioned in the German Presidency's programme⁹.

3. **EU Biodiversity Strategy for 2030**

- 3.1 The European Biodiversity Strategy for 2030 largely aims to achieve the targets set in the previous strategies.
- 3.2 This strategy is based on recommendations by the Council that the EU and its Member States must set an example and multiply their efforts to counter biodiversity loss and restore ecosystems. In December 2019, the Council provided strategic guidance for biodiversity covering the period up to 2030, in line with the Green Deal. The Council stressed the need for urgent global action at all levels to halt biodiversity loss and committed itself to:
- mainstreaming biodiversity into all relevant EU policies, first and foremost the new Common Agricultural Policy (CAP);
 - eliminating subsidies that are harmful to biodiversity;
 - more effective revision of implementation and reporting in the area of nature and biodiversity policies, measures and commitments;

⁷ See, for example, Opinion 7/2018 and Special Report 13/2020.

⁸ IPBES, *Summary for policymakers of the global assessment report on biodiversity and ecosystem services*, 2018.

⁹ *Leipzig Charter and the Urban Agenda for the EU*.

- achieving full, effective, consistent integration of biodiversity into the planning and implementation of the EU's Multiannual Financial Framework 2021-2027;
- accelerating the transition towards a resource-efficient, safe, circular and climate-neutral economy that protects and restores biodiversity and ecosystem services;
- bringing national and international financial flows – particularly in the field of public procurement – into line with the global biodiversity framework.

3.3 The EESC has had the opportunity to express its views on biodiversity policy on a number of occasions¹⁰, and notes once again here that what is lacking is political will and not the legal basis. Indeed, the Council's decision in December 2019, which is partly reflected in the strategy, contains nothing new, and is in danger once again of not being put into practice.

3.4 The EU's new biodiversity strategy not only aims to protect and restore nature in Europe, but addresses ecosystem service questions more decisively than previous strategies. It is also much clearer about the objectives of restoring lost habitats and sets out a path for the EU's biodiversity targets for COP 15, the key Conference of the Parties on Biodiversity, scheduled to take place in 2021.

3.5 The 2030 Biodiversity Strategy sets out three objectives for a coherent network of protected areas:

- legally protect a minimum of 30% of the EU's land area and 30% of the EU's sea area and integrate ecological corridors, as part of a true trans-European nature network;
- make a third of these areas strictly protected, i.e. 10% of the EU's land area and 10% of its sea area;
- effectively manage all protected areas, defining clear conservation objectives and measures, and monitoring them appropriately.

3.6 In order to restore degraded and fragile ecosystems (for which an effective legal framework is not yet in force) and to reduce the pressure on biodiversity, numerous measures are envisaged, *inter alia*, to:

- draw up a proposal for a new legal framework for nature restoration;
- by 2030, restore significant areas of degraded and carbon-rich ecosystems, prevent deterioration in conservation trends and status of habitats and species, and ensure that at least 30% reach favourable conservation status or at least show a positive trend;
- halt and reverse the decline in farmland birds and insects, in particular pollinators;
- reduce the use and risk of chemical pesticides by 50% and likewise reduce the use of more hazardous pesticides by the same amount;
- ensure that at least 10% of agricultural land qualifies as "areas of ecological focus", including high-diversity landscape features;

¹⁰ [OJ C 195, 18.8.2006, p. 96](#); [OJ C 97, 28.4.2007, p. 6](#); [OJ C 161/48, 13.7.2007, p. 48](#); [OJ C 317/75, 23.12.2009, p. 75](#); [OJ C 306/42, 16.12.2009, p. 42](#); [OJ C 48/150, 15.2.2011, p. 150](#); [OJ C 24, 28.1.2012, p. 111](#); [OJ C 67, 6.3.2014, p. 153](#); [OJ C 487, 28.12.2016, p. 14](#); [OJ C 129, 11.4.2018, p. 90](#); [OJ C 62, 15.2.2019, p. 226](#) and [OJ C 47, 11.2.2020, p. 87](#).

- ensure that at least 25% of agricultural land is under organic farming management, and that the uptake of agro-ecological practices is significantly increased;
- plant at least three billion trees, with full respect for ecological principles, and protect remaining primary and old-growth forests;
- make significant progress in the remediation of contaminated soil sites;
- restore 25 000 km of the EU's rivers to a free-flowing state;
- reduce the number of Red List species threatened by invasive alien species by 50%; reduce losses of nutrients caused by fertilisers by at least 50% and the use of fertilisers by at least 20%;
- ensure that cities with at least 20 000 inhabitants have an ambitious Urban Greening Plan;
- ensure that no chemical pesticides are used in sensitive areas such as EU urban green areas;
- substantially reduce the negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, to achieve good environmental status;
- eliminate by-catch of species or reduce it to a level that allows full species recovery and does not threaten their conservation status.

3.7 These objectives will be achieved, *inter alia*, by implementing the following measures:

- creating the conditions to enable transformative change to occur by putting in place a new process for improving biodiversity governance and ensuring that Member States incorporate the commitments outlined in the Strategy into their national policies;
- stepping up efforts to implement and enforce EU environment legislation;
- unlocking EUR 20 billion a year for biodiversity through various sources, including EU funds and national and private funding, including natural capital and biodiversity considerations in business practices;
- making the EU a world leader in addressing the global biodiversity crisis, bringing to bear all external action tools and international partnerships to achieve a new, ambitious UN global biodiversity framework;
- strengthening civil protection by establishing an EU policy in order to reinforce the scope for immediate reaction all over Europe in the event of forest fires;
- establishing regional fire brigade teams in the individual Member States so as to increase flexibility of action in case of forest fires;
- facilitating training for civil society in all Member States, using regional bases and setting up of small teams to make for rapid reactions.

3.8 To bring about this necessary, transformative change, the Commission plans to put in place a new European biodiversity governance framework. This will include a monitoring and review mechanism based on a clear set of agreed indicators. The need for a legally binding approach to governance will be assessed in 2023.

3.9 The Commission puts implementation and enforcement of EU environmental legislation at the heart of its strategy. The plan is both to improve cooperation with Member States and European networks, inspectors, police and prosecutors and to strengthen the role of civil society.

3.10 The strategy presented is for the EU, but the Commission stresses that there will be more focus on biodiversity protection at bilateral and multilateral level too, adding that the EU is ready to take on a leading role in a high-ambition coalition on biodiversity at the CBD COP 15.

3.11 The new 2030 strategy action plan sets out around 40 measures to be taken over the next four years, as shown in the indicative timetable attached to the proposal.

4. **General comments**

4.1 The EESC welcomes the Commission's efforts to develop a Biodiversity Strategy for 2030 as one of the paths towards the European Green Deal and the global biodiversity framework proposed by the CBD.

4.2 The unprecedented biodiversity loss and spread of devastating pandemics are sending out a clear message: it is time to rethink our relationship with nature. In the EESC's view, the biodiversity strategy is the way forward in putting Europe's biodiversity at the heart of the post-COVID-19 recovery for the benefit of people, the climate and the planet. Biodiversity loss and the climate crisis are interdependent and influence each other. Consistently protecting and restoring forests, soils and wetlands and creating green spaces in cities are important in order to achieve climate mitigation by 2030.

4.3 The biodiversity strategy recognises the following link: efforts to protect natural resources which still exist need to be significantly stepped up in the EU, meaning that a) protected areas need to be expanded, in particular strictly protected areas. However, this will in no way be sufficient to halt the decline in biodiversity (not just in terms of the number of species, but above all in terms of the size of populations where there have been major declines, as evidenced by large-scale insect deaths). That is why b) significant efforts are also needed to restore habitats. Both objectives are explicitly supported by the EESC.

4.4 The EESC agrees with the Commission that the decline in protected species and habitats is mainly due to poor implementation of the legal framework and insufficient funding. The existing legal framework (essentially the Birds and Habitats Directives) focuses on endangered species and habitats, but biodiversity protection goes far beyond that – these directives do not cover insects or pollinators, and nor do they cover ecosystem services or green infrastructure.

4.5 The EESC therefore supports the Commission's proposals to consider the introduction of additional legal instruments should the Member States fail to rapidly implement the new objectives in the coming years. The EESC also emphasises that the quality of protection and good practice at Member State level, such as voluntary protection measures, should be recognised and encouraged.

4.6 Besides the factors mentioned already, the EESC notes that there are additional factors causing the decline, among others human behaviour.

4.7 The EESC agrees with the Commission's analysis that the ongoing dramatic decline in biodiversity requires the network of protected areas to be significantly expanded. In particular,

there has not, thus far, been enough focus on protecting natural processes. The new target of making 10% of areas strictly protected will change this. These measures would have a positive impact in terms of the climate, protecting pollinators and insects and improving groundwater retention in local areas. In requiring a trans-European nature protection network to be set up, the Commission is seeking to remedy the lack of methodology in the Habitats Directive and rightly underlines the importance of ecological connectivity. In so doing, it also returns to the issue of green infrastructure, which, regrettably, after Commission Communication COM(2013) 249 final, was not developed with the necessary drive.

- 4.8 The EESC recognises that, to achieve the recovery objectives, new, legally binding targets are required. The 2020 biodiversity strategy sets a target of restoring 15% of degraded ecosystems. Achievement of this target has been totally inadequate, in particular because it was not legally binding.
- 4.9 The EESC welcomes the fact that the strategy is addressing the issue of financial needs more clearly. It has been recognised for some time that there is insufficient funding: until now only 20% of the needs of natural protection areas, including those in the Natura 2000 network¹¹, have been covered, and the EESC's financial estimates have always been much higher than those of Commission.
- 4.10 The Committee has also expressed clear support for a separate funding line which is independent of the agricultural budget, as has the European Court of Auditors.
- 4.11 In its opinion, the Court of Auditors observed that it is not clear what proportion of CAP expenditure is dedicated to biodiversity. According to the Commission, around 8% of the EU budget has been spent on protecting biodiversity (EUR 86 billion in the period 2014-2020). The Court of Auditors criticises the fact that, despite this, no positive effects have been recorded.
- 4.12 This is also due to the fact that the second pillar programmes, which are particularly effective in terms of biodiversity, are not only underfunded but are also mostly organised in a way that is unappealing to farmers in many Member States.

For many years, the EESC has also supported ways of, for example, making it easier for farmers to take measures to promote biodiversity, including, *inter alia*, a sufficient incentive component. The EESC stresses that while farmers and forest owners must also be required to protect biodiversity, they cannot be expected to bear the cost of this. Rather, providing this "public good" should become a useful source of income for them.

- 4.13 The Commission states that there is a need for EUR 20 billion per year. One of the shortcomings of the biodiversity strategy is that it states a need for EUR 20 billion per year of financing without specifying either a) how this amount is calculated or b) how it should be covered.

¹¹ See COM(2010) 548 final, p. 13.

- 4.14 The new Multiannual Financial Framework does not provide for this amount. This is surprising since, in December 2019, the Council called for "the full, effective and coherent integration of biodiversity [...] into the design and implementation of the new Multiannual Financial Framework (MFF) 2021-2027" (see point 3.2). In any case, the EESC can see no sign of this, and considers this to be a worrying indication that there are – yet again – significant discrepancies between words and actions.
- 4.15 The EESC criticises the fact that, in this biodiversity strategy, the Commission fails yet again to implement the Council recommendations of December 2019 on financial support for biodiversity protection measures and does not propose effective measures to end all subsidies that are harmful to biodiversity. In addition, in relation to the Council's request for more effective revision of implementation and reporting in the area of nature protection and preserving biodiversity, the Commission has yet to propose adequate instruments.
- 4.16 The EESC agrees with the Commission that, for most protected areas, sustainable management practices are a good way to preserve or boost high biodiversity values. However, the EESC considers it essential that part of the protected areas be subject to strict protection, which means non-intervention management. Only then can natural processes be effectively protected.
- 4.17 The EESC therefore welcomes the intention of increasing the proportion of areas under strict protection, and highlights the fact that the protection of natural processes is of the utmost importance for biodiversity protection, particularly in times of dramatic climate change. It is very much welcomed that a very high priority has been given to strict protection (with non-intervention management) of primary and old-growth forests. However, the EESC points out that, in particular, privately-owned primary and old-growth forests cannot really be effectively protected without substantial compensation payments. In this connection, the EESC points to and applauds the action taken by environment NGOs, which are acting as environment watchdogs, and the constant interventions by firemen engaged in protecting areas which are often rich in biodiversity. For state-owned primary and old-growth forest land, the EESC would have liked to see a Commission recommendation on suspending felling activities. Current forest protection disputes in several EU Member States show that there is significant economic pressure on state-owned areas as well.
- 4.18 The EESC stresses that the Common Agricultural Policy needs to be brought into line with the biodiversity strategic objectives¹², European climate law, the Farm to Fork Strategy and the goals of the European Green Deal.
- 4.19 The EESC deplores the fact that neither the most recently proposed Multiannual Financial Framework nor the European Recovery Plan include any additional expenditure to protect biodiversity.

¹² In November 2018, the European Court of Auditors strongly criticised the Hogan proposals for post-2020 agricultural reform and determined that they did not meet the environmental objectives.

- 4.20 The EESC considers it important to have a strong and comprehensive strategy for forests and the forest sector. This is particularly necessary because the EU does not have a common forest policy based on legislation.
- 4.21 The EESC notes that the target of making 10% of land priority areas in the agricultural sector is not reflected in the CAP second pillar reform proposal currently under discussion, which only mentions a "minimum percentage" without specifying a figure. The fact that this requirement is recognised by the Commission and yet is not taken into account in the parallel reform process sends out an extremely negative signal.
- 4.22 The EESC is very pleased to see green infrastructure being strengthened, and calls on the Commission and the Member States to develop and implement a coherent green infrastructure strategy. The EU should make trans-European networks for green infrastructure (TEN-G) an investment priority and provide them with adequate, targeted funding.
- 4.23 As well as legally binding restoration targets, a new legislative initiative is announced to expand protected areas if the Member States do not follow the Commission's guidelines and recommendations. The EESC deems these legislative measures to be essential if the Member States do not radically overhaul their protection of biodiversity. The legislative initiative announced for 2024 should therefore lead to the development of a comprehensive biodiversity directive that also addresses the other shortcomings discussed in this opinion and which should be accompanied by an impact assessment providing a better assessment of trade aspects.

Brussels, 18 September 2020

Luca JAHIER

The president of the European Economic and Social Committee

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N.B.: Appendix overleaf

APPENDIX
to the
OPINION
of the European Economic and Social Committee

The following amendment, which received at least a quarter of the votes cast, was rejected during the discussions:

Point 4.18

Amend as follows:

The EESC stresses that the Common Agricultural Policy needs to be brought into line with the biodiversity strategic objectives, European climate law, the Farm to Fork Strategy and the goals of the European Green Deal. It is important that implementation of biodiversity strategy will not threaten food security or the livelihood of rural areas in the EU.

Result of the vote:

For: 59
Against: 106
Abstentions: 8
