

WWF's brief analysis of the Biodiversity and Farm to Fork Strategies

Main points WWF was looking for in the EU Biodiversity Strategy

- 1) Commit to **keeping existing environmental policies strong** and stimulate **enforcement and implementation** of the Birds and Habitats Directives, Water Framework Directive, Marine Strategy Framework Directive, the EU Timber Regulation and the Invasive Alien Species regulation.

The strong focus on the need to step up implementation and enforcement of key environmental legislation is very positive. WWF is calling on the Commission to clearly commit that it will not engage in a revision of the Water Framework Directive which would further delay its implementation.

- 2) Commit to an **effectively managed and connected network of protected areas, covering at least 30%** of the EU's land and sea and to introduce a **legally binding restoration target** supported by a new EU law.

WWF is very supportive of the ambitious targets on Protected Areas and Marine Protected Areas, committing to protect at least 30% of the EU's land and sea, with strict protection measures for one third of these areas, including the remaining primary and old-growth forests. Strong monitoring of the management effectiveness of all PAs and MPAs will be needed however, to avoid this becoming a paper exercise.

WWF is also very supportive of the announcement of the Commission to present legally binding EU restoration targets in 2021 to restore degraded ecosystems, in particular those with the most potential to capture and store carbon and to prevent and reduce the impact of natural disasters. For WWF, at least 15% of the EU's land (approximately 650.000 km²) and sea (approximately 1.000.000 km²) should be restored.

A further delivery in 2021 will be the proposed action plan to conserve fisheries resources and protect marine ecosystems. Concrete steps must be taken on its development in the coming weeks, with clear timelines and measurable targets to hold EU progress to account.

- 3) Address unsustainable use on agriculture, fisheries, bioenergy and water management and by doing so, **tackle the key drivers of biodiversity loss.**
 - *The Commission has set out ambitious quantitative targets to increase organic farming (25%) and high-biodiversity landscape features (10%), as well as to reduce pesticides (50%), nutrient losses (50%) and fertilizers (20%).*
 - WWF regrets the fact that there is no concrete commitment in the strategy to completely ban bottom-trawling from the most sensitive areas within Marine Protected Areas.



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- WWF welcomes the commitment to restore 25,000 kms of free-flowing rivers through barrier removal and looks forward to working with the European Commission on implementing this target.
- WWF welcomes the recognition that burning trees and crops for energy is not desirable and the commitment to review policies in this area. Radical reform of EU rules on bioenergy is long overdue.

4) **Invest** in nature and **phase out conflicting funding**.

The fact that the Biodiversity Strategy mentions for the first time a concrete figure (at least €20 billion per year that should be unlocked to be spent on nature) is positive, but should be made more concrete, with a binding spending target of 50% of the MFF and the upcoming recovery package for climate and environment. Based on the Member States Priority Action Frameworks, identifying the investment priorities for mainly the management of the Natura 2000 network the investment needed is estimated to be around 15 billion euro/year already.

The urgent need to eliminate biodiversity-harmful subsidies, such as the ones to greenfield hydropower projects destroying our rivers, is not mentioned in the text, which is a major gap as it is a must to implement the 'do no harm' green oath of the European Green Deal.

While the phasing out of harmful fisheries subsidies is mentioned in the strategy, the particular subsidies this refers to are not identified

5) Take a **leadership role globally** by reducing EU's footprint and advocating for an ambitious 2030 global biodiversity framework.

The determination of the EU to show leadership at CBD COP15, by bringing its own commitments to the table, the explicit reference to the fact that the global 2030 targets need to address the drivers of biodiversity loss and the strong focus on the need to strengthen the implementation of the global biodiversity framework, including a ratchet mechanism, are positive points. There are however important gaps of key global targets by 2030 the EU should support like halving the footprint of consumption and production. The 2030 targets should aim to halt and start to reverse biodiversity loss by 2030. The target of no human induced species extinctions should be for 2030, not 2050 and should be without qualifications.

The announcement of a legislative proposal in 2021 to avoid or minimise the placing of products associated with deforestation or forest degradation on the EU market is a welcome decision on a long-standing demand from NGOs. However, the text only refers to the conversion or degradation of forests, and it should be extended to also cover other ecosystems and human rights violations.

Main points WWF was looking for in the EU Farm to Fork Strategy

Based on a long-term vision, set out ambitious **quantitative targets for 2030 on key parameters** such as organic and high nature value farming, agrochemical use, GHG emissions reduction and carbon dioxide removal, as well as farmland biodiversity.

The Commission has set out ambitious quantitative targets to increase organic farming (25%) and high-diversity landscape features (10%), as well as to reduce pesticides (50%), antimicrobials for farm animals (50%), nutrient losses (50%) and fertilizers (20%).

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Nevertheless, it has failed to include any targets for agriculture on GHG emissions reductions and carbon dioxide removal, and completely missed out on the importance of high nature value farming to preserve biodiversity..

Make a strong **commitment to reorient the Common Agricultural Policy (CAP)** and its ongoing reform.

The European Commission fell short amending the CAP regulations themselves, but the analysis of their alignment with the European Green Deal is giving a clear orientation for co-legislators, just a few months ahead of the finalisation of negotiations in the European Parliament and Council.

Most notably, the Commission is now supportive of ring-fencing funds for CAP eco-schemes, albeit without any specific figure, and will ask Member States to translate the targets mentioned in the Farm to Fork and Biodiversity Strategies into their CAP strategic plans.

Ensure **EU fisheries and imports of seafood are fully transparent and traceable**, and that fisheries controls are better applied.

Disappointingly, there are no new actions specifically on fisheries and seafood announced in the Farm to Fork Strategy. While the challenges of sustainability, transparency and better control of fisheries and seafood are mentioned, finding resolutions will rely on ongoing revisions (e.g. of the Fisheries Control Regulation) and achieving better implementation of existing EU rules.

The mention of algae as an important source of alternative feed for livestock is presented as a simple replacement or addition to existing feed materials, without taking a more systemic view or addressing the need to reduce overconsumption (notably of animal proteins) in the EU.

Develop and implement clear rules to **ensure supply chains of agriculture products are free from deforestation** and destruction of other ecosystems and human rights violations.

The announcement of a legislative proposal in 2021 to avoid or minimise the placing of products associated with deforestation or forest degradation on the EU market is a welcome decision on a long-standing demand from NGOs. However, the text only refers to the conversion or degradation of forests, and the scope should be extended to also cover other ecosystems and human rights violations.

Reduce high-footprint food production and consumption, including actions to accelerate the transition to healthy sustainable diets, an action plan on proteins and shifting away from industrial animal farming.

This is one of the weakest parts of the Farm to Fork Strategy. While the importance of the topic is acknowledged, the actions proposed are mostly limited to labelling and public procurement,

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disregarding the scientific evidence and advice that underlines the multiple interventions that are needed to modify the food environment and accelerate the nutritional transition.

Similarly, the scattered mentions of proteins and of the impacts of livestock farming are not followed by any ambitious action, just proposing end-of-pipe solutions like feed additives or leaving it to Member States to change VAT rates if they want to favour fruits, vegetables or organic food.

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