

Preliminary WWF analysis of the EU 2030 Biodiversity Strategy

Intro

Today, the European Commission took steps towards sustainable biodiversity, food and farming policies by publishing roadmaps for the next 10 years. In the midst of the COVID-19 outbreak, which has brought our relationship with the natural world into sharp focus, the strategies have never been more timely.

The EU Farm to Fork and 2030 Biodiversity Strategies launched today are potential game changers for EU nature, food and farming policies. The strategies propose a new wave of essential and long overdue targets on topics such as protected areas, restoration of nature, organic farming and the reduction of agricultural chemicals.

WWF's reaction on the release of both strategies can be found [here](#).

This document contains a more detailed, preliminary assessment by WWF of the Biodiversity Strategy, based on our expertise, and is not covering all the chapters of the strategy.

An updated version of this paper will be provided in the coming days.

1. Biodiversity - The need for urgent action

WWF welcomes:

- The clear message that protecting and restoring biodiversity and well-functioning ecosystems is key to boost our resilience and prevent the emergence and spread of future diseases and that we need to give nature the space it needs to have healthy and resilient societies.
- The clear message that investing in nature protection and restoration will also be critical for Europe's economic recovery from the COVID-19 crisis and that when restarting the economy, it is crucial to avoid falling back and locking ourselves into damaging old habits.
- The clear messages on the interlinkages between the biodiversity and the climate crisis and the fact that nature is a vital ally in the fight against climate change. The aim for the strategy to serve as a compass and a frame to the EU's green economic transition, including the industrial, energy, circular economy and sustainable food transitions.
- The clear message that the biodiversity strategy will be a central element of the EU's recovery plan.

Further improvements needed:

- While the five main direct drivers of biodiversity loss (land and sea use changes, overexploitation of resources and organisms, climate change, pollution and Invasive Alien Species) are clearly highlighted, the important reference that those are

underpinned by unsustainable production and consumption patterns and commitments to reduce our ecological footprint, are missing.

2. Protecting and restoring nature in the European Union

2.1. A coherent network of protected areas

WWF welcomes:

- The commitment to legally protect a minimum of 30% of the EU land area and 30% of the EU sea area and integrate ecological corridors.
- The commitment to strictly protect at least 1/3 of the EU protected areas (10% on land and 10% at sea), including all remaining EU primary and old-growth forests.
- The commitment to effectively manage all protected areas, defining clear conservation objectives and measures, and monitoring them appropriately.
- The Commission will assess after 2023 whether an EU legislative proposal is needed to reach the protected area targets. This is a step in the right direction to make the target enforceable. However, not only will Member States (MS) need to progress in legally designating the required new protected areas and integrating ecological corridors needs to be taken into account, but also the much needed increase of management effectiveness of the existing protected areas.

Further improvements needed:

- Effective management of all protected areas must lead to an improvement in the conservation status of the protected habitats and species. Without implementation and monitoring on the ground of the management effectiveness, the establishment of conservation objectives and measures can be solely a paper exercise.

2.2. An EU Nature Restoration Plan: restoring ecosystems across land and sea

2.2.1. Strengthening the EU legal framework for nature restoration

WWF welcomes:

- The commitment to present binding EU nature 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. However, a SMART

target is not proposed yet. For WWF, at least 15% of the EU's land (approximately 650,000 km²) and sea (approximately 1,000,000 km²)¹ should be restored.

- The commitment that no species and habitats protected under the BHD should show a deterioration in trends and status.

Further improvements needed:

- The Commission should also propose a CO₂ climate sink target, on the amount of carbon that will be sequestered by restored natural ecosystems.
- With regards to restoration actions for farmland habitats, the strategy should have proposed a thorough revision of the farm subsidies. The Common Agricultural Policy (CAP) payments should offer fair support for changing farming practices, especially for rewetting peatlands and restoring high-diversity grasslands, and avoid operating against the restoration objectives.
- The proposed target of 30% of habitats and species which are not in favourable status should achieve such status in 2030 or at least show a strong positive trend, is not reflecting fully the ambition of the Birds and Habitats Directive.

2.2.2. Bringing nature back to agricultural land

WWF welcomes:

- The commitment to have at least 25% of the agricultural land under organic farming.
- The commitment to have 10% of agricultural area under high-diversity landscape features such as buffer strips, fallow land, hedges or ponds.
- The commitment to reduce the risk and use of chemical pesticides by 50% in the EU by 2030.
- The commitment to reverse the decline in pollinators and the full implementation and review of the EU pollinators' initiative, to evaluate if additional measures are necessary.

Further improvements needed:

- While these commitments are ambitious and SMART, they are all voluntary. The announced revision of the Sustainable Use of Pesticides Directive must be used to enshrine the pesticides reduction target into legislation.
- For all EU agricultural targets, the crucial step will be to make them part of the Common Agricultural Policy. The Commission has suggested some ways to do so (e.g., by asking Member States to set national targets which are aligned with the EU ones) but they will only be truly enforceable if the co-legislators (Parliament and Council) include such provisions in the CAP post-2020 regulations.
- There needs to be much higher attention to High Nature Value farming systems, on which much of the EU's farmland biodiversity relies. Semi-natural grasslands are highlighted as a type of ecosystem to restore (section 2.2.1), but the analysis or

¹ This figure still includes the Exclusive Economic Zone/EEZ of the United Kingdom. The final figure should correspond to the EU 27 EEZ.

correction of the drivers that are leading to their disappearance, including the inadequate farming policy, is missing in the strategy.

- The commitment to have 10% of agricultural land under high diversity landscape features includes an uncertain geographical scale of application. To be effective, it should be deployed at the smallest possible scale (ideally in all parcels of farmland) and in a way that co-benefits for farming are multiplied (e.g., limiting losses of soil and nutrients).

2.2.3. Addressing land take and restoring soil ecosystems

Not covered in the analysis

2.2.4. Increasing the quantity of forests and improving their health and resilience

WWF welcomes:

- The commitment to define, map, monitor and strictly protect all remaining EU primary and old growth forests and to advocate for the same globally (section 2.1)
- A clear statement that all forests need to be preserved in good health to retain their functions for biodiversity and climate change
- The commitment to plant at least 3 billion additional trees in Europe in full respect with ecological principles. Strong safeguards as for where and how (fully respecting ecological principles like the use of autochthonous species etc.) are however needed to make sure this will not be detrimental to biodiversity.

Further improvements needed:

- The achievement of the objectives mentioned is linked to the EU Forest strategy, but the focus in the Biodiversity Strategy is on growing 3 billion additional trees. A comprehensive strategy, also including biodiversity and how to link it to forest management is needed, if we want to achieve better resilience of forests.
- There needs to be a much stronger emphasis on the fact that forest protection and forest restoration are more important than reforestation or afforestation, both from a biodiversity perspective and from a climate perspective.
- The development of guidelines on biodiversity-friendly afforestation and reforestation and closer-to-nature forestry practices are positive developments. However, a smart target on the amount of forests covered by such practices is missing.

2.2.5. Win-win solutions for energy generation

WWF welcomes:

- The statement that bioenergy should be based on wastes and residues rather than whole trees or food and feed crops (although the suggestion that the new RED will be much help in this regard is simply wrong).
- The commitment to publish an assessment of the sustainability of bioenergy by end 2020 and use that to inform changes to policy in this area. Radical reform to EU bioenergy rules is long overdue and essential to meeting climate and biodiversity goals.

Further improvements needed:

- With regards to new offshore wind development, the necessity to apply the ecosystem approach needs to be underlined.

2.2.6. Restoring the good environmental status of marine ecosystems

WWF welcomes:

- The request to harvest the marine resources sustainably with a zero-tolerance for illegal practices.
- The emphasis on the importance of applying the ecosystem-based approach in marine spatial plans, and the emphasis that these need to be cross-sectoral and include area-based conservation measures.
- The new action plan to be developed by 2021 to protect marine ecosystems and conserve fisheries resources, and especially using the EMFF to support fisheries transition to more selective and less damaging fishing techniques.

Further improvements needed:

- The need to reconcile, in a socio-economically just way, the use of bottom-contacting fishing gear with biodiversity objectives must emphasise the urgent need to conserve vulnerable seabed habitats, to support a sustainable blue economy and future fisheries. Therefore a clear commitment to completely ban bottom-trawling from the most sensitive areas within Marine Protected Areas is needed.
- The fisheries management measures requested to be established in all marine protected areas must ensure that the primary goal of any MPA is environmental conservation and restoration, and that any fishing carried out in the area does not contradict or impair these goals.
- It should be highlighted that the impacts caused by climate change on the ocean must be taken into account, especially when talking about the full implementation of the CFP, MSFD and the CFP.

2.2.7. Restoring freshwater ecosystems

WWF welcomes:

- The commitment to restore 25,000 kms of free-flowing rivers through barrier removal, and the urge for Member States' authorities to review water abstraction and impoundment permits to restore ecological flows. Infrastructures affecting the physical shape and/or flow of a river are the biggest pressure on our rivers and lakes.
- The acknowledgement that the EU's legal framework on water is ambitious and that enforcement must be stepped up. The reference to the objective of the Water Framework Directive, according to which all EU rivers, lakes, transitional and coastal waters including wetlands will be in good ecological status by 2027 should remain the guiding target for protecting and restoring rivers, lakes and groundwater bodies.

Further improvements needed:

- In order to reach full-speed implementation of the Water Framework Directive, we need a clear commitment from the European Commission that the Water Framework Directive (WFD) will not be revised - in line with the [positive findings of the two-year fitness check evaluation](#) which concluded that slow progress towards objectives is "not due to a deficiency in the legislation".
- Technical support from the Commission to support Member States in reviewing water abstraction and impoundment permits must be provided no later than 2021 in order to feed in the third cycle of River Basin Management Plans, and not in 2023 as proposed.
- The strategy missed the opportunity to require Member States to phase out harmful subsidies affecting freshwater ecosystems, including subsidies for hydropower dams, and for unsustainable agriculture through the Common Agriculture Policy (as demonstrated by the recent report on [the impact of the CAP on water](#)).

2.2.8. Greening urban and peri-urban areas

Not covered in the analysis

2.2.9. Reducing pollution

WWF welcomes:

- The commitment to address nutrients pollution in air, water and soil, both from diffuse and point sources and the commitment to reduce nutrient losses by at least 50%, and fertiliser use by at least 20%.

Further improvements needed:

- We look forward to seeing more actions developed to further reduce pollution from nitrogen and phosphorus flows into freshwaters and soil, in particular from agriculture and urban sources. Action to reduce nutrient losses should not be only focused on mineral fertilisers, but on all types of fertilisation, particularly in farmed areas with an over-concentration of livestock or where urban sewage sludge or wastewater are used.

2.2.10. Addressing invasive alien species

WWF welcomes:

- The aim to minimise, and where possible eliminate, the introduction and establishment of alien species in the EU environment, although a smart target should be formulated.
- The commitment to reduce by 50% the Red List species threatened by invasive alien species (IAS).

Further improvements needed:

- The positive impact of the Invasive Alien Species Regulation depends on the political ambition of the List of Invasive Alien Species of Union Concern, which should include the most harmful species with a higher impact on biodiversity, and those that are not yet present in the EU or are in the early stages of invasion. Currently only around 6 % of IAS present in Europe are listed. A step up in the listing process is therefore urgently needed, as there are many IAS that are considered to be priority species for listing according to the Scientific report "*A prioritised list of invasive alien species to assist the effective implementation of EU legislation*" (Carboneras et al., 2017).
- All the invasive species affecting the 354 threatened species should be listed, and prevention, control or eradication plans for those affecting the critically endangered species should be implemented as a priority.

3. Enabling transformative change

3.1. A new governance framework

WWF welcomes:

- The proposed new biodiversity governance framework, including a monitoring and review mechanism, is key to improve the accountability and implementation of the strategy. For the governance framework to be effective, it will need to be legally binding, making it possible to impose sanctions to Member States in case of non-compliance. The fact that the European Commission is planning to assess the necessity of a legally binding approach is therefore a step in the right direction, but this assessment should be done at the start of the strategy, and not in 2023.

- It is positive that the monitoring and review mechanism will contribute to an increased focus on natural capital, biodiversity and ecosystem services of the European Semester.

Further improvements needed:

- Many commitments in the Biodiversity Strategy lack information on how they can be achieved, what will be needed at member state level, clear definitions etc. Member States and stakeholders need to be involved in those discussions.
- There should be a clearer and stronger link between the monitoring and review mechanism and the European Semester: it should not simply 'contribute' to the European Semester, it should instead become one of the key parts of the Semester to ensure that the latter puts natural capital, biodiversity and ecosystem services as one of the main new elements to monitor and improve. The Covid-19 crisis makes clear that destroying and over-exploiting nature can indirectly lead to more pandemics with disastrous consequences and astronomic costs for our economy: natural capital should not be sidelined anymore.

3.2. Stepping up implementation and enforcement of EU environmental legislation

WWF welcomes:

- The clear message that the EU has a solid legislative framework in place , which recent evaluations have shown are fit for purpose, but that implementation on the ground is lagging behind, with disastrous consequences on biodiversity and with a very high economic cost.
- The statement that full implementation and enforcement of EU environmental legislation is at the heart of this strategy, and that political support and financial and human resources will need to be prioritised for this.
- The intention of the Commission to also ensure that relevant environment-related legislation with an impact on biodiversity, such as the directives on environmental impact assessment, on strategic environmental assessment, on environmental liability and on environmental crime will be better implemented and enforced.
- The review and possible revision in 2021 of the Environmental Crime Directive in 2021. The support for the compliance watchdog role of civil society by engaging with MS to improve access to national courts in environmental matters and to broaden standing for NGO's by proposing a revision of the Aarhus Regulation. This revision should be done as quickly as possible, still in 2020.

Further improvements needed:

- Mentioning the full implementation of the Water Framework Directive is not sufficient in the light of its fitness check conclusions and clear calls from citizens and scientists. We need a further commitment from this European Commission that it will not engage in a revision of the Water Framework Directive which would further delay its implementation.

- Smart objectives in relation to implementation and enforcement are lacking. Clear targets to progress the open infringement cases within set timescales and annual public reporting on cases are needed.
- Any review or revision of the Environmental Crime Directive should seek to strengthen its provisions, notably by completing the legislation covered by the directive and increasing the sanctions levels for serious and organised crimes.

3.3. Building on an integrated and whole of society approach

3.3.1. Business for biodiversity

WWF welcomes:

- The reference to the review of the reporting obligations of businesses under the non-financial reporting directive, which will be critical to ensure that companies report adequately their impact and dependencies with nature.
- The EU legislative proposal on corporate duty of care and mandatory due diligence in 2021: it is critical to implement the 'do no harm' oath of the Green New Deal.
- The new initiative in 2021 on sustainable corporate governance to "help ensure shareholder and stakeholder interests are fully aligned with the objectives set out in this strategy".

Further improvements needed:

- The need for companies to set a biodiversity strategy and measurable target(s) is lacking. In the climate area, the notion of corporate climate science-based targets is gradually becoming central². Similarly, global and EU biodiversity targets need to be translated into tailored biodiversity corporate targets (or potentially at sector level), to ensure that the economy stops being "blind" on its biodiversity impacts and contributes in a strategic and targeted way to the achievement of global and EU targets. A significant part of the total remuneration of executive staff should be linked to the achievement of such targets. This should become an explicit part of the sustainable corporate governance initiative in 2021.
- It should be added on the review of the non-financial reporting directive that the Commission committed to establish a standard reporting framework for companies. In this new context, mandatory sector-specific KPIs should be developed to ensure comparability of sustainability reporting between comparable companies, and this should include biodiversity indicators where relevant (i.e. material in terms of biodiversity impacts or biodiversity-related financial risks).

² As an example, through the climate Science-Based Target initiative almost 900 companies committed globally to set a tailored climate target to align their business model with the Paris Agreement:

<https://sciencebasedtargets.org/>

3.3.2. Investments, pricing and taxation

WWF welcomes:

- The fact that the Biodiversity Strategy mentions for the first time a concrete figure (at least 20 billion euro/year that should be unlocked to be spent on nature) is positive, Concrete mechanisms to make sure the next MFF will deliver on biodiversity, like a binding spending target of 50% of the MFF and the upcoming recovery package for climate and environment, is lacking. In addition, it is important to underline that based on the MS's Priority Action Frameworks, identifying the investment priorities for mainly the management of the Natura 2000 network, the investment need would be around 15 billion euro/year already.
- The commitment from the Commission to strengthen its biodiversity proofing framework for EU funding.

Further improvements needed:

- The urgent need to eliminate biodiversity-harmful subsidies 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. The Commission must commit to identify such subsidies in the MFF 2021-2027 and table/support legislative changes for their elimination, in particular in the CAP and CFP. For such subsidies at national level, the Commission should commit to identify them and tailor Country-Specific Recommendations for their elimination through the European Semester.
- In particular, the Commission should clarify that biodiversity proofing for all EU funding will become mandatory, as voluntary guidance failed to achieve the EU 2020 biodiversity targets and to stop biodiversity loss.
- The EU taxonomy is mentioned but the Commission needs to use this new powerful tool in all possible ways to scale up biodiversity-friendly lending, investing, insuring, taxation/subsidies, green public procurement and more.
- In particular, the Commission committed in its Sustainable Europe Investment Plan communication to improve climate and environment tracking in the MFF and InvestEU: the Commission should use the EU taxonomy to track biodiversity-friendly spending in all EU public finance including the next MFF, InvestEU and the forthcoming EU recovery fund. The EU taxonomy should replace the Rio markers which are less science-based and more prone to greenwashing.
- In the on-going review of the EU sustainable finance Action Plan, the Commission should ensure that the delegated acts for the (investor) Disclosure Regulation will include biodiversity. It should also commit to develop a taxonomy of unsustainable economic activities in its review of the taxonomy by end 2021 to ensure that biodiversity-harmful activities will be identified as such in a science-based way.

3.3.3. Measuring and integrating the value of nature

WWF welcomes:

- The Commission's commitment to better integrate biodiversity into public and business decision-making at all levels.
- The Commission's commitment to measure the impacts (footprint) of products and organisations on the environment as well as natural capital accounting and quantitative measurement of ecosystems.

Further improvements needed:

- Biodiversity footprinting measurement is positive but not sufficient. A complementary science-based and forward-looking indicator is needed: the degree of alignment with biodiversity objectives.

3.3.4. Improving knowledge, education and skills

Not covered in the analysis.

4. The European union for an ambitious global biodiversity agenda

4.1. Raising the level of ambition and commitment worldwide

WWF welcomes:

- The determination of the EU to show leadership at CBD COP15, by bringing its own commitments to the table and the intention to support other parties to step-up action.
- The proposal to support ambitious global 2030 targets in line with the EU commitments of the biodiversity strategy, that should be formulated in a SMART way; and the specific mention that these targets need to address the drivers of biodiversity loss.
- The strong focus on the need to strengthen the implementation, monitoring and review process, which mentions the ratchet mechanism.
- Plans to mainstream Biodiversity throughout EU's Green Diplomacy and forthcoming Green alliances

Further improvements needed:

- A mission statement, to halt and reverse biodiversity loss by 2030, as mentioned in the CBD COP15 Council conclusions³ is critical and should be included in the Post 2020 Global Biodiversity Framework. Otherwise it remains unclear what the 2030 targets will

³ <https://data.consilium.europa.eu/doc/document/ST-15272-2019-INIT/en/pdf>

collectively aspire to achieve by 2030. Achieving this mission for 2030 is possible and should be the focus of the framework.

- Apart from the 2030 targets in line with the EU's own commitments, the EU needs to support the following targets by 2030 as a priority:
 - o no human induced species extinction
 - o Halving the footprint of consumption and production.
 - o Measurable action targets for key sectors (responsible for biodiversity loss): forest, agriculture and food, fisheries, mining, infrastructure, resource use and circular economy and finance sector
 - o Targets and measures to align all financial flows with the goal of halting and starting to reverse biodiversity loss by 2030, including ending harmful subsidies but also mandatory disclosure of financial risks and biodiversity impacts by financial institutions, and other rules and incentives.
- The framework should include adequate measures to ensure participation, gender mainstreaming and a rights-based approach aimed at strengthening the capacity of duty bearers and empowering the rights holders.
- How Green alliances and Diplomacy will be pursued and achieved is left rather vague, raising questions on how advanced such plans are, what will be their nature/legal form, and how they link to existing bilateral/regional partnership agreements

4.2. Using external action to promote the EU's ambition

4.2.1. International Ocean Governance

WWF welcomes:

- The commitment to conclude an ambitious legally binding instrument on BBNJ by 2020 and to ratify and implement it thereafter as soon as possible.
- The commitment to have zero tolerance towards illegal, unreported and unregulated fishing, to combat overfishing, and to get a global agreement to ban harmful fisheries subsidies.

Further improvements needed:

- While the phasing out of harmful fisheries subsidies is mentioned in the strategy, it is not identified as to which subsidies this refers to. It needs to be clearly outlined in the Biodiversity Strategy which these harmful fisheries subsidies are, for example those which increase the capacity of the fleet or support fuel costs.

4.2.2. Trade policy

WWF welcomes:

- 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.

- The commitment to better assess the impact of trade agreements on biodiversity, with follow-up actions to strengthen the biodiversity provisions of trade agreements if relevant.
- The commitment to crack down on illegal wildlife trade and the revision of the Action plan against Wildlife Trafficking in 2021. It is important that the action plan against Wildlife Trafficking will be continued to avoid implementation gaps.

Further improvements needed:

- The role of the EU as an exporter of agricultural products produced with commodities coming from ecosystem destruction (e.g. beef or chicken export) needs to be addressed as well.
- Trade and sustainability chapters in trade agreements need mechanisms to make them enforceable. Currently all that can happen is a complaint and a report but no concrete measures to stop destructive trade.

4.2.3. International cooperation, neighbourhood policy and resource mobilisation

WWF welcomes:

- The intention to keep working with partner countries and increase its support in the post-2020 context on biodiversity conservation, restoration, sustainable use and mainstreaming in all development and partnership policies
- EU's acknowledgement that increased financing and phasing out of harmful subsidies is required for effective implementation of post 2020 global biodiversity strategy - but no concrete commitment is made in this respect.
- The intention to support partner countries in a broad range of sectors and approaches, such as sustainable agriculture and fisheries, sustainable water resource management, land restoration, and protection/restoration of areas with high ecosystem services and mitigation potential, though the adaptation potential should be strengthened to reflect existing needs and challenges, particularly in most vulnerable LDCS and SIDS countries. .
- Plans to promote a One health approach, recognizing the links between human health, animal health and healthy and resilient nature to prevent and increase resilience to future pandemics
- Plans to set up initiatives such as "NaturAfrica" - and others in other regions - to support partner countries achieve the new global targets, fight environmental crime, and tackle the drivers of biodiversity loss are welcome. These plans are however left rather vague, and hard to determine what the initiatives would entail. Inclusive and participatory approaches, involving civil society and local communities in partner countries, should be ensured in designing and implementing these initiatives. All drivers of biodiversity loss should be tackled in a comprehensive and holistic way and solutions be designed in a way that deliver multiple social/economic co-benefits

Further improvements needed:

- The EC commitment to increase its contribution to global biodiversity finance remains vague, as no specific target is mentioned. Increased financing should go hand in hand with other measures, such as capacity building and promotion of policy reforms especially in the context of EU's cooperation with LDCs, SIDS and fragile developing partner countries.
- Reference to integrating policy coherence for sustainable development in all EU's policies is welcome but lacks clarity on which tools and screening processes will be used to avoid negative impacts and maximize benefits, including social aspects, and how it builds on current efforts.
- The importance of strengthening its commitment to a human-rights based approach, in line with the EU's Human Rights action plan, and its support for indigenous and local peoples rights, including right to FPIC, as well as promotion of gender equality, promotion of transparency and civic participation and tackling corruption linked to natural resource governance