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Executive Vice-President for the European Green Deal
European Commission

Mr Virginijus Sinkevičius
Commissioner for Environment, Oceans and Fisheries
European Commission

Mr João Pedro Matos Fernandes
Minister of Environment and Energy Transition of the Portuguese Republic

Mr Cesar Luena
Member of the European Parliament

Open letter to the European Commission, the Presidency of the Council of the European Union, and the European Parliament's rapporteur on the Biodiversity Strategy for 2030, calling for the full implementation of the nature protection commitments in the Biodiversity Strategy

6 May 2021

Dear Executive Vice President, Dear Commissioner,
Dear Minister,
Dear European Parliament Rapporteur,

We write to you as an informal coalition of non-governmental organisations, under the umbrella of the European Habitats Forum¹ to express our support for the protected areas commitments in the 2030 EU Biodiversity Strategy and to call for their full implementation.

We are losing nature at an unprecedented rate. Globally, one million species are threatened with extinction and the health of the ecosystems on which we depend is deteriorating more rapidly than ever. Europe is no exception. The EEA's latest State of Nature in the EU report paints a sobering picture: over 60% of protected species and 81% of protected habitats in the EU are in poor or bad conservation status.² To curb this negative trend, we need to better protect and restore nature at scale and allocate sufficient funding. We also need to address the underlying drivers of biodiversity loss, by better integrating biodiversity goals in other policies, like agriculture, marine and energy policies. The 2030 EU Biodiversity Strategy, published in May 2020 and endorsed by Member States in October 2020, contains ambitious commitments to tackle biodiversity loss, and as an NGO community we have welcomed this Strategy and called for its ambitious implementation.

With this letter we want to express our support for the protected area targets for 2030 in the EU Biodiversity Strategy³. The current network of legally protected areas is not sufficiently large, representative, connected and effective enough to safeguard biodiversity against pressures. Enlarging and effectively managing protected areas for biodiversity will not only benefit nature and threatened habitats and species by increasing resilience but will also bring considerable socio-economic and climate benefits.

¹ The Forum represents the voice of the environmental civil society organizations which take part in it and coordinates communication between them and the European Commission. It provides advice and knowledge on relevant issues to the Commission and is represented in various fora, including the Commission's Expert Groups, the Coordination Group on Biodiversity and Nature and the Nature Directors meetings. <https://www.iucn.org/regions/europe/our-work/eu-biodiversity-policy/european-habitats-forum>

² <https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020>

³ The Strategy commits to a more effective implementation of conservation in existing protected areas; to extend the PA network to a minimum of 30% of EU land and sea, including through increasing connectivity; and ensuring at least 10% of EU land and sea areas are strictly protected.

We have drafted recommendations⁴ on how the nature protection commitments in the Biodiversity Strategy should be implemented. In particular, we want to underline the following key messages:

- The overall aim of the protected area commitments should be to establish an ecologically coherent, well connected, representative, equitably and well-managed network of protected areas and OECMs (other effective area-based conservation measures) that is fully functional as soon as possible and at the latest by 2030.
- All protected areas (existing and new) should be effectively managed for biodiversity and the provision of affiliated ecosystem services. Too many protected areas in Europe are still used for intensive agriculture and forestry and for intensive fishing, or not managed effectively and are nothing more than 'paper parks'.⁵ Legally binding management agreements or plans, comprehensive conservation objectives based on sound science, field monitoring of biodiversity and regular evaluation of the conservation and management measures are essential to ensure effective protection.
- We welcome and support the commitment to designate additional protected areas to reach at least 30% of land and sea and highlight the need to complete the Natura 2000 network as a priority. Additional designations should also cover Red Listed and other species and habitats of importance that are not covered by the EU Habitats Directive, including wild pollinators.
- Knowing that habitat fragmentation and fragmentation of protected areas is a major driver of biodiversity loss and taking into account the rapidly changing climate and environmental conditions, the 30% protected area target should be complemented by actions for improved connectivity and area robustness. This should be aligned with the legally binding restoration targets, green infrastructure planning and sectoral policies.
- We support the commitment to grant special attention to areas of very high biodiversity value or potential in the form of strict protection and to strictly protect at least 10% of the EUs land, freshwater and sea, including the relevant marine key biodiversity areas (KBAs).
- Strict protection should focus primarily on non-intervention management and the protection of natural processes and vulnerable biodiversity- and carbon-rich areas, including semi-natural grasslands and peatlands. This means that all extractive and habitat- or species-damaging activities must be excluded in those areas. Management activities strictly required for the conservation of the biodiversity of the protected area, like grazing or mowing, equitable management actions linked to pressures and threats reduction, visitors and local residents, and restoration measures to make the non-intervention possible, should be allowed as narrow exceptions to the general non-intervention approach in such strictly protected areas.
- We strongly support the commitment that all remaining primary and old-growth forests should be strictly protected. While the process of defining and mapping those forests is ongoing, there is an urgent need for logging moratoria in areas where remote-sensing data suggests that they hold old-growth forests, in accordance with the precautionary principle (Article 191 of the Treaty on the Functioning of the European Union).
- The protected area targets need to be reached both at national and at biogeographical level as this would entail a fair sharing of efforts by all Member States and reflect the role that protected areas play to restore functional ecosystems across EU biogeographical regions. It is clear that the 30% should be considered as a minimum percentage.
- Effective stakeholder participation is crucial at all stages of protected area management, from the designation phase to the management, monitoring and reporting. It is especially important to ensure respect for the rights of indigenous peoples and local communities when new protected areas are designated and management plans are implemented.

⁴ https://www.iucn.org/sites/dev/files/content/documents/2020_09_30_ehf_paper_on_pa_target_final.pdf

⁵ https://www.wwf.eu/wwf_news/media_centre/?uNewsID=352796

We call on the European Commission, as guardian of the Treaties, to significantly step up the enforcement of EU environmental legislation, in line with the 2030 EU Biodiversity Strategy commitment⁶ and the overall Green Deal objectives. This needs to be accompanied with an increase of resources and capacity within the European Commission.

We urge the European Member States to step-up the implementation of all existing legal obligations under the Birds and Habitats, Water Framework and Marine Strategy Framework Directives, in particular to improve the management effectiveness and connectivity of the protected area network. In addition, we call on EU Member States to implement the nature protection commitments in the 2030 EU Biodiversity Strategy without delay, in line with the Council Conclusions⁷ adopted in October 2020, where those targets were welcomed by the EU Council of Ministers.

We ask the European Parliament to strongly support the nature protection commitments and the need for their ambitious implementation in its Own Initiative Report on the 2030 EU Biodiversity Strategy, in line with the main points mentioned above.

We stand ready to participate in discussions with the European Commission, Member States and other stakeholders in a constructive way, but underline the need to go further than business as usual to halt biodiversity loss and enhance recovery of functional ecosystems, in line with the EU Green Deal and 2030 EU Biodiversity Strategy.



⁶ EU Biodiversity Strategy to 2030, chapter 3.2: "The full implementation and enforcement of EU environmental legislation is therefore at the heart of this strategy, for which political support and financial and human resources will need to be prioritised."

⁷ <https://data.consilium.europa.eu/doc/document/ST-11829-2020-INIT/en/pdf>