

## IUCN's views on the proposed European Biodiversity Strategy to 2030 launched jointly with the European Farm to Fork Strategy on 20 May 2020

*As we find ourselves in the midst of the COVID-19 crisis, it is important to emphasise the need to reconsider our relationship with the environment. Land use change, habitat fragmentation, deforestation and an expanding agricultural and urban frontier increase the contacts between humans and other animals, potentially increasing the chances of zoonoses emerging and spreading. Human health is deeply interconnected with the health of its surrounding environment. Thus, in the aftermath of this crisis, we need to rebuild our way of living with a holistic approach, prioritising the well-being of both people and nature. The moment of pause and reflection that this outbreak has allowed us to live should be used to acknowledge the mistakes of the past, praise the heroic efforts of the health care workers during the crisis and ponder our collective steps for the future. In this context, the European Biodiversity Strategy to 2030 and the Farm to Fork Strategy are fundamental instruments to restore a healthy and mutually beneficial human-nature relation, one able to enhance resilience in light of the present challenges and those that will arise in the future. To achieve the goals and commitments of the strategy, as well as the successful implementation of the new governance framework, the EU Biodiversity strategy to 2030 should be considered as a key component of the European recovery plan and placed at the heart of the discussions over the new Multiannual Financial Framework. Through the allocation of the needed funding and the prioritisation of biodiversity on the political agenda, Europe will be able to fulfil its role to put nature on the path to recovery and lead by example at the global level.*

The European Commission (EC) presented in December 2019 the [European Green Deal](#), a new plan which aims to transform the EU into a “fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use”. A crucial component of President von der Leyen’s Agenda for Europe is the recently published [EU Biodiversity Strategy to 2030](#). Building on the previous decade-long [EU Biodiversity Strategy to 2020](#), the new plan aims to put biodiversity on a path to recovery for the benefits of the people, the planet, the climate and our economy. The commitment stated by the European Commission should be thus thoughtfully aligned with the 2030 mission of the [Zero Draft](#) on the Post-2020 Global Biodiversity Framework, currently being developed by the Convention on Biological Diversity (CBD).

To learn and **recover from the COVID-19 crisis, biodiversity and the European Green Deal should be placed at the centre of the EU’s recovery plan**, to ensure a healthy, prosperous and sustainable society.

As a global science-based conservation Union working with many different stakeholders, **IUCN welcomes the targets and actions** elaborated by the European Commission and **calls on Member States to harmonize national and subnational legislation with the new EU biodiversity governance framework, inviting MS to show a high level of national ambition and concrete leadership in Europe towards the rest of the world.**

The European Union should aim to become the frontrunner in **tackling the dual crises of climate change and biodiversity loss, and a starting point should be the full and effective implementation of the EU extensive environmental legislation and policies.** This includes, *inter alia*, the [Birds and Habitats Directives](#), the [Invasive Alien Species Regulation](#), the [Water Framework Directive](#), [the Marine Strategy Framework Directive](#), [the Zoos and Aquariums Directive](#), [the Single Use Plastic Directive](#) and the newly presented [Climate Law](#); but also the [Pollinators Initiative](#), [the Green Infrastructure Strategy](#), [the Plastics Strategy](#), the [Forest Strategy](#) and others.

**IUCN welcomes the EC’s focus on the implementation and monitoring of the EU Biodiversity strategy to 2030** and recommends maintaining a high level of environmental ambition for the rest of the elements of the EU Green Deal, including the Farm to Fork Strategy.

IUCN highlights the issue of lack of ownership of the biodiversity targets from crucial sectors as one of the key factors for failure: in this context, and to ensure a strong level of coordination and coherence between different policies, **IUCN strongly recommends that the implementation of the future EU Biodiversity Strategy to 2030 remains at the level of the Vice-President of the European Commission during the next decade** - not in the least to assure synergies with the EU Climate Policies.

Furthermore, in support of the implementation of this Strategy, **IUCN recommends further detailed actions to be outlined by the European Commission as soon as possible, in consultation with relevant stakeholders.**

Finally, in relation to the ongoing discussions for the elaboration of the 8th Environmental Action Plan (8EAP), **IUCN believes that it is crucial for the EC to consider the actions included in the Green Deal as the base of the 8EAP, so as to ensure ownership of the Green Deal of all the EU Institutions, beyond the EC.**

## **The EU Biodiversity Strategy**

### **1. Biodiversity – the need for urgent action**

The EU Biodiversity strategy for 2030 identifies and strives to tackle the five main drivers of biodiversity loss: sea and land use change, overexploitation; climate change, pollution and invasive alien species. IUCN emphasises the need for a holistic approach of the EU Biodiversity Strategy to 2030 and for a whole of society engagement: **to achieve a successful outcome, it is of the utmost importance to get ownership of the strategy from all stakeholders and mainstream nature-goals across all sectors.** In this sense, **it would be positive to include -and ideally disaggregate by sectors- the targets of the Strategy in relevant legal instruments (such as implementing acts or mid-term review) in the context of the implementation of the key EU funds, with a particular emphasis in the CAP, but also in other relevant sectoral policies** including those on fisheries, regional development, cohesion or research.

There is a high volume of different streams of “voluntary commitments” with some relation with biodiversity (e.g. Honolulu Challenge for Invasive Alien Species, Bonn Challenge for restoration, or The Oceans Conference related commitments for marine issues). Considering the ongoing discussion on future voluntary commitments also in the context of CBD, and keeping in mind that [the EU was also supportive to this issue within the CBD process](#), IUCN suggests to explore ways to join these different efforts. In particular, **the EU could consider an action to support the creation and maintenance of a mechanism to find synergies between the different commitments and their contribution to the biodiversity targets, make this information available to relevant parties, and facilitate their reporting and monitoring.**

**IUCN suggest that the EU Strategy makes a direct reference to the key role of the national and**

**subnational authorities, who should also secure the allocation of the needed funding for the implementation of the strategy.**

**IUCN emphasizes the crucial need for coordination within the key sectoral Ministries** (including the Ministries responsible for fisheries, spatial planning, health, agriculture and climate) as well as for enhancing the engagement of all relevant stakeholders, as an essential ingredient for a successful outcome. Furthermore, **IUCN urges the Member States to include in their national strategies SMART and ambitious biodiversity targets** to achieve the transformative change mentioned in the Strategy and in the [IPBES Global Assessment](#) from 2019.

### **2. Protecting and restoring nature in the EU**

**IUCN welcomes the target to protect and effectively manage at least 30% of EU land and 30% of sea area** through an EU wide network of ecologically representative protected areas. This would include protected areas as well as other area based effective conservation measures (OECMS) – the latter should follow the [IUCN guidelines](#). **IUCN also welcomes the suggestion to devote part of these areas to strict protection, following the [IUCN protected areas \(PAs\) management categories I and II.](#)**

To ensure the required implementation of the conservation measures regarding protected areas, **IUCN suggests to use the [IUCN Green List of Protected and Conserved Areas](#) as an inspiration to secure the management efficiency of the sites, as a potential action for the implementation of the Strategy.** This IUCN global standard has been adapted to the Natura 2000 context, as an international benchmark for quality to improve the performance of these areas and achieve conservation objectives. **In particular, this standard can be helpful to improve the implementation and evaluation of the management of the Natura 2000 sites.** In any case, IUCN holds the view that **Natura 2000 sites should have an inclusive management instrument that balances the visions of all stakeholders approved by 2025**, so a first evaluation of its implementation could happen by 2030.

**IUCN welcomes the commitment to ensure that neither habitats nor species show a deterioration trend by 2030, and IUCN encourages Member States to be more ambitious in the aim to improve their conservation status by 2030.**

In this context, **IUCN encourages the EC to consider a higher percentage than 30% of habitats and species**

**to be in favourable conservation status by 2030, as well as encourages Member States to consider even more ambitious targets nationally.** To this end, sharp species conservation action planning is critical, and IUCN encourages the EC to promote these efforts among MS using the IUCN [‘Assess to Act’ Framework](#). To further ensure and monitor the positive effort in protecting threatened species and halting biodiversity loss, **IUCN encourages the EC and EU Members States to promote new assessments and regular re-assessment of the [IUCN Red List of Threatened Species](#).** IUCN also asks to ensure that no species of community importance is reported to have an ‘unknown’ status in 2026-2027 (next Habitats Directive reporting cycle). The next State of Nature Report could actually then be seen as a crucial steppingstone in the evaluation of the implementation of the new plan, which will provide the ability to ratchet-up action if needed.

Furthermore, **IUCN welcomes the new EU Nature Restoration Plan, and strongly supports the adoption of a legally binding EU restoration target** and reiterates the importance of the effective implementation of the existing European and national legislation regarding degraded ecosystems (including the Birds and Habitats Directives, the Water Framework Directive and the Marine Strategy Framework Directive). **The [Bonn Challenge](#) could be also a helpful tool to raise the level of ambition, and EU Member States are encouraged to make pledges in this context.** The Bonn Challenge is an implementation vehicle to realize many existing international commitments by bringing 150 million hectares of the world’s deforested and degraded land into restoration by 2020, and 350 million hectares by 2030. To help in the assessment of the restoration-related goals of the strategy, **IUCN suggests the use of the Restoration Opportunities Assessment Methodology (ROAM), an analytic process for identifying restoration opportunities at national or sub-national levels,** as well as describing how those opportunities relate to food, water and energy security. This will also be an important contribution from the EU to the [UN Decade of Ecological Restoration](#), set to end in 2030. **The IUCN encourages the EC to consider measuring progress towards these targets by updating the [European Red List of Ecosystems](#).**

The focus on connectivity and ecological integrity is fundamental, and in this context **IUCN recommends that the EU fully integrates the green and blue infrastructure (GI) in all land/sea related policies,** with a special focus in the implementation of the

Common Agricultural Policy (CAP) and Common Fisheries Policy, as well as in regional and local planning. In fact, **the implementation of the [EU Green Infrastructure Strategy](#) should be further integrated, as a needed action for the implementation of the EU Biodiversity Strategy to 2030.**

Agriculture plays a fundamental role within the EU and mitigating its impact is essential in protecting biodiversity. In this context, **IUCN welcomes the proposed goal to increase the uptake of agroecological practices and suggests that by 2030 all agricultural land should follow sustainable agriculture approaches.** In this context, the IUCN Europe report on sustainable agricultural approaches will be a helpful tool. **However, for a successful implementation of the targets related to agriculture, it is vital that the CAP and the EU Biodiversity Strategy are coherently aligned.** It is also fundamental to increase the ownership of European farmers over the biodiversity targets, for which specific actions should be foreseen.

IUCN supports the EU’s inclusion of targets highlighting the importance of the **EU pollinators strategy in Europe, nonetheless it is important to further specify with specific actions how the CAP will contribute to its implementation.**

With regard to forests, **IUCN welcomes the emphasis placed on increasing their quantity, enhancing their ecological quality and promoting their resilience.** For that reason, the CAP Strategic Plans should include the necessary measures for this purpose at national and subnational levels.

The EU Biodiversity Strategy for 2030 acknowledges the importance of nature-based solutions (NbS) and the wide array of benefits that they provide both to the environment and to society. **IUCN, as a pioneer in the field of nature-based solutions, offers its expertise to the European Commission in developing future related actions or sub-targets to complement the current strategy.** The work of IUCN in developing a [Global Standard for Nature-based Solutions](#) should be considered as the primary basis in deploying these actions within the European context. Furthermore, **IUCN applauds the EC’s commitment to dedicate a significant proportion of the 25% of the EU budget dedicated to climate action to biodiversity and nature-based solutions.**

**IUCN welcomes the commitment to reduce fish mortality and eliminate by-catch of species threatened with extinction, as well as of other**

**species.** This should be a priority of the EU and its Member States, especially seeing the continuous worsening of marine ecosystems. **IUCN also welcomes the suggested zero-tolerance to illegal practices.**

**IUCN welcomes the attention given to green urban areas in the EU Biodiversity strategy to 2030.** The targets set out in this section well align with Target 10 of the Zero Draft of the Post-2020 Global Biodiversity Framework and address a gap of the previous EU Biodiversity Strategy to 2020. Coordination on several institutional levels, from EU institutions to single municipalities need to be enhanced to guarantee the enactment of these actions at all scales. In this context, the expertise of IUCN and of other relevant international organisations can surely be a complementary tool to provide technical guidance to Member States, relevant ministries and regional authorities.

IUCN agrees with the Commission that **nature-based solutions should be systematically integrated** in the development of high-quality green infrastructures and buildings in European Cities. The work being conducted by the IUCN [Urban Alliance](#) and its upcoming Urban Nature index could provide a strong basis to both the EC and EU Member States to achieve the commitments related to green urban areas.

Pollution is one of the main drivers of biodiversity loss worldwide and it is strictly interconnected with modern society's way of life. Although the targets enshrined in the new EU Biodiversity Strategy reflect the problematics regarding pollution, **IUCN stresses the need for a strong cohesion amongst European strategies.** The [Circular Economy Action Plan](#), the [Farm to Fork strategy](#), the [upcoming action to tackle deforestation and forest degradation](#) the Chemical Strategy for Sustainability, and of course this [Biodiversity Strategy](#) from the [Green Deal Roadmap](#) should be closely interconnected and seen as complementary.

With regard to **invasive alien species (IAS)**, IUCN endorses the Commission's efforts to minimize and where possible eliminate the introduction of new IAS in the upcoming decade and **welcomes the use of the IUCN Red List of Threatened Species in the target formulated** by the EU Biodiversity Strategy. **IUCN also suggests considering the use of the [Environmental Impact Classification of Alien Taxa \(EICAT\)](#)** in support of the implementation of the Regulation (prioritization, evaluation).

### **3. Enabling transformative change**

Furthermore, **IUCN urges the European Commission to ensure that the announced new biodiversity governance framework is fully inclusive and provides opportunities for all actors to present their views and discuss with others; and to make operational this framework as soon as possible.** Learning from the past, **there is the imperative need of full implementation and effective enforcement of all relevant EU legislation** to preserve and restore biodiversity.

From IUCN perspective, and considering the past challenges to ensure support for the achievement of the targets from other sectors, the implementation and ownership sections of the new strategy are one of the most essential components to achieve the targets of the new EU Biodiversity Strategy to 2030. **IUCN stresses the relevance of a public debate on this strategy, including on the implementation of its actions, and the potential development of new ones.** A transparent and inclusive feedback process could help improve these new biodiversity plans, as well as enhance the sentiment of ownership by all stakeholders. The upcoming evaluation of the EU Biodiversity Strategy to 2020 is fundamental in this context, in order to better include the strengths and preventively address potential weaknesses of the past strategy.

To achieve the objectives detailed in the new strategy, the European Commission and EU Member States should mobilize a significant amount of resources. **IUCN stresses the need for the mentioned mobilisation of both private and public national and EU funds for the achievement of the targets, which is especially relevant in the context of the discussion of the future 2021-2027 Multiannual Financial Framework**, in particular the CAP should play a crucial role to invest into the transformational change needed. In line with these commitments, **IUCN strongly supports future actions focused to the elimination of harmful subsidies to biodiversity conservation.**

**IUCN also suggests considering actions to continue the acknowledgement of the economic worth of ecosystems into accounting and reporting systems across Europe, such as proposing "a new module on ecosystem accounting in 2025, in the context of the Environmental Accounting Regulation 692/201".**

IUCN also welcomes the EC initiative of establishing a European Business for Biodiversity movement.

However, considering the global dimension of today's market, a stronger emphasis should be placed on the EU's internal and external environmental footprint. To achieve this goal, **IUCN supports the EC's commitment of transitioning to more sustainable production and consumption patterns stated in the Farm to Fork strategy.**

**Global trade agreements and policies should be supplemented by the inclusion of a 'do not harm biodiversity' clause, complying with WTO regulations, and take into consideration the application of the "user pays" and "polluter pays" principles. IUCN further stresses the need to include minimum biodiversity criteria for the import of commodities and raw materials in all trade agreements.**

With regard to knowledge and education, **IUCN welcomes the European Commission proposal to establish a New Knowledge Centre for Biodiversity.**

Furthermore, public support is a *conditio sine qua non* for the strategy to succeed. Apocalyptic scenarios and negative narratives are not the most helpful, or could have a counterproductive effect. Instead, while not underestimating the magnitude of the challenges ahead, we should focus on the positive actions and opportunities that surround these policies. In a time of crisis, further stressed by the global pandemic of COVID-19, it is important to ensure factual and optimistic messages associated with these policies: In this sense, **IUCN suggests to focus on positive communication narratives and messages in the future, and proposes the nomination of European biodiversity champions and ambassadors to promote both large and small scale efforts.** To this end, the upcoming [IUCN Green List of Species](#) provides a tool for assessing the recovery of species' populations and measuring their conservation success supporting the building up of optimistic vision of biodiversity conservation.

#### **4. The European Union for an ambitious global biodiversity agenda**

**The European Union needs to lead the process at the global stage and lead by example, holding a high level of ambition, especially in the post COVID-19 times, when there might be a risk for the environmental considerations to decrease their level of political priority. This is also important in the context of the development of the Post-2020 Global Biodiversity Framework, to be adopted at the 15<sup>th</sup> Conference of the Parties of the Convention on Biological Diversity.**

IUCN believes it is important to ensure an alignment of the overall structure of the Strategy and its actions -as much as possible- with the future CBD Post-2020 Global Biodiversity Framework, to enhance consistency between both the European and the Global one, and to help future monitoring. In this sense, due to the time difference in the publication of these two frameworks, it is **suggested that in 2022 an evaluation of the contribution of the European Biodiversity Strategy to 2030 to the Global Biodiversity Framework targets is carried out.**

In addition, **IUCN suggests to the European Commission to considers potential future specific targets or actions that each relevant Directorate General could be responsible for, so that the mainstreaming across different sectors is enhanced.**

**IUCN welcomes the emphasis placed on a regular cycle for reviewing the implementation of National Biodiversity Strategies and Action Plans (NBSAPs) by the EU Biodiversity Strategy to 2030. Once published and revised, the monitoring framework presented by the EU biodiversity strategy could be a model to consider at international level to increase higher standards of implementation and compliance worldwide.**

Additionally, **IUCN encourages the EC to be forward-looking and consider actions in the EU by 2030 to prevent potential adverse impacts and advance potential beneficial impacts of biotechnology and other new technologies on biodiversity, as well as to promote access on a fair and equitable basis to the results and benefits arising from biotechnologies based upon genetic resources.**

Despite the unforeseen postponement of the majority of events linked to the [super year for nature and biodiversity 2020](#), the European Union should continue its efforts to promote biodiversity conservation and restoration worldwide. The so-called **Green Deal Diplomacy should be complemented with a strong political message at the highest level reinforcing the importance of achieving the *Living in Harmony* vision, and the Sustainable Development Goals.**

The EU should provide support to developing countries through resource mobilisation, capacity building, technological transfer, technical and scientific cooperation. The promotion of nature-based solutions, climate change mitigation and adaptation measures, sustainable agricultural practices and green investments should be promoted within the context of development cooperation and neighbourhood policy.

**IUCN welcomes the intention to pay attention to the EU Outermost Regions (ORs) and Overseas Countries and Territories (OCTs)**, where most of the EU biodiversity is located. This attention would need to be translated into concrete scaled up actions, not only targeting biodiversity hotspots and protected areas but the territories as a whole in an integrated approach. Notwithstanding their political and legal differences, ORs and OCTs share the same challenges, and together play a key role to the achievement of EU and international biodiversity targets. Therefore, the Strategy should aim to maintain a coordinated and harmonised approach among ORs and OCTs. Building on the European BEST Initiative, the Strategy could also expand small grants for biodiversity, coupled with capacity building. In this regard, IUCN welcomes the future LIFE Programme and encourages to extend such approach to all stakeholders to foster greater mobilisation and ownership.

Despite the progress made on policy and knowledge improvement actions over the last decade, the measures taken by Member States have not been sufficient in halting the degradation of ecosystems and services. [The mid-term review of the EU Biodiversity Strategy to 2020](#) and the [IPBES 2019 Global Assessment](#) show that there is an urgent need to **scale-up actions at all levels** to restore degraded land, rivers and sea, especially carbon-rich ecosystems essential in the global fight against climate change. It is important to keep in mind that the long-term CBD vision of *Living in harmony with nature* will be achieved only if nature is both protected and restored throughout the entire continent.

## The Farm to Fork Strategy

IUCN welcomes the launch of the Farm to Fork strategy, an essential component of the EU Green Deal aimed at shifting current food systems towards a more sustainable paradigm. **IUCN welcomes the first objective of the Strategy for the food chain to have a neutral or positive environmental impact, which includes conserving or recovering habitats and biodiversity. In particular, IUCN highlights the EC's commitment to reduce the use of harmful pesticides, antimicrobials and fertilisers by 2030**, as well as the commitment to promote sustainable agriculture, e.g. through the goal to increase the EU organic farming area.

IUCN welcomes the recognition of the pressure on natural resources caused by food-chains and the need to manage our land to restore biodiversity, build-up carbon in soils, and to ensure water quality and availability. Hence, **IUCN encourages the use of sustainable agriculture approaches and practices**, such as those described in IUCN's upcoming report on approaches to sustainable agriculture.

In any case, the Farm to Fork strategy will benefit from the definition of more SMART and ambitious targets, especially related with environment. Generally, **the Strategy and its implementation should be strongly interlinked with the Biodiversity Strategy, and we welcome this being highlighted in the communication. IUCN welcomes the careful consideration of the targets under the Green Deal, including the Farm to Fork strategy and the Biodiversity strategy, for the CAP Strategic Plans. IUCN also welcomes the aim to have a legislative proposal for a framework for a sustainable food system before the end of 2023**, which we hope will be able to further and adequately integrate the many components of the Green Deal.

Finally, **IUCN supports a strong role of the EU in the global transition to sustainable food systems.** To that end, we welcome an active role of the EU in the international context, including the 15<sup>th</sup> meeting of the COP of the UN Convention on Biological Diversity.