To

Frans Timmermans
Executive Vice-President of the European Commission
European Green Deal

Virginijus Sinkevičius,
Commissioner for Environment, Oceans and Fisheries

Rue de la Loi / Wetstraat 200
1000 Brussels

14 December 2021

Subject: EU Nature Restoration Law

Dear Vice-President Timmermans, Dear Commissioner Sinkevičius,

We are writing to you to raise our concerns regarding the overall ambition of the EU Nature Restoration Law (NRL) which is in the final stages of preparation by the European Commission. We are strongly convinced that clear, measurable targets for land area, river length and sea area are the key elements to make this legislation as ambitious, fit-for-purpose, and effective as possible. These measurable targets should reflect the level of political priority given to this file through the European Green Deal. EU biodiversity is in a terrible state and the NRL can offer solutions to the interlinked climate and biodiversity crises.

A proposal based on targets formulated as a percentage of “degraded area”, based on Member States’ assessments as part of their Article 17 reporting obligations under the EU Habitats Directive would be insufficient. As it stands, the reporting of Member States is not comprehensive, has many data gaps (with the condition of significant percentages of habitats and species listed as “unknown”) and therefore, underestimates the restoration efforts needed to put biodiversity on a path to recovery by 2030. As it stands, it leaves room for interpretation and inaction, as it is unclear how much land, river length and sea area would need to be restored and to what degree.

Therefore, we are strongly convinced that only numerical targets referring to the whole EU land area, river length and sea area can provide a real drive for biodiversity and climate, and create legal certainty for speedy and effective implementation. Just as with the EU Climate Law, a robust and understandable EU headline target that overarches the individual ecosystems (and species) specific targets is indispensable in order to mobilise Member States’ action at the required scale and helps bring civil society on board. Additionally, it can facilitate the monitoring of individual Member States’ contributions, thus ensuring the timely achievement of the EU-wide targets.

As NGOs, we advocate for a target to restore at least 15% of the EU land and sea area, as well as river length by 2030, to which all underlying ecosystem specific targets should contribute. That would mean restoring 650,000km² of land, 1,000,000km² of marine EU area and 178,000km of rivers.

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Adding such clear and meaningful overall targets as a specific article in the proposed new law would express the political commitment that you have powerfully and repeatedly articulated in your speeches in various instances and fora.

We hope that your decisions in the final consultations on the NRL will put Europe on a path of nature recovery which is in the interest of all European citizens and future generations.

Thank you for taking our recommendations into account in your deliberations.

Yours sincerely,

Undersigned organisations:
European Environmental Bureau
BirdLife Europe and Central Asia
WWF European Policy Office, on behalf of the WWF European network
Client Earth
CEEweb for Biodiversity
Natuurmonumenten
Intl Assn of River Keepers
Eco-TIRAS (Moldova)
Naturefriends International
Seas At Risk
Coordinamento Nazionale Tutela Fiumi Free Rivers Italia
BUND e.V. (Friends of the Earth Germany)
Natuurpunt vzw (Flanders - Belgium)
Eko-zivot
Terra Cypria
Danish Society for Nature Conservation (Danmarks Naturfredningsforening)
Balkani Wildlife Society
Peralstrede Dolomiti (Italia)
Milvus Group - Bird and Nature Protection Association
Deutsche Umwelthilfe
Deutscher Naturschutzbund (DNR)
Fundación Nueva Cultura del Agua
Swedish Society for Nature Conservation (SSNC)
NABU
Deutsche Stiftung Meeresschutz (DSM)
Oceana in Europe
Eko-Zivot
DEM
Inter-environnement Wallonie
Ostwind e. V.
North Sea Foundation
Latvian Fund for Nature
Czech Society for Ornithology
BIOM Association
Liga para a Protecção da Natureza (LPN)
Sociedad Española de Ornitología (SEO/BirdLife)
Cork Environmental Forum
AG Geobotanik in SH&HH
Irish Peatland Conservation Council
Birdlife Estonia
BOS+
BirdLife Cyprus
Irish Wildlife Trust
Romanian Ornithological Society Association
A Rocha International
Biodiversity Action Europe
BirdLife Hungary
Global Youth Biodiversity Network Europe
Coalition for Rivers Czech Republic
SOS/BirdLife Slovakia
BirdLife Austria
Amigos de la Tierra (Friends of the Earth Spain)
Miljøbevægelsen NOAH - Friends of the Earth Denmark
MedWet
Friends of the Earth Europe
Legambiente Onlus
Italy
Hnutí DUHA - Friends of the Earth Czech Republic
Spolek Ametyst
Společnost pro trvále udržitelný život/Society for Sustainable Living
Western Center of the Ukrainian Department of International Center of Scientific Culture – The World Laboratory
Friends of the Earth Cyprus
Polish Ecological Club
Pomeranian Branch
Naturschutzgesellschaft Schutzstation-Wattenmeer e.V.
Centro Ibérico de Restauración Fluvial
Děti Země (Children of the Earth)
Royal Society for the Protection of Birds (RSPB)
Platforma pro krajinu (Platform for the Landscape)
BirdLife Finland
Beleco
Dansk Ornitologisk Forening - BirdLife Danmark
ZERO - Associação Sistema Terrestre Sustentável
Coalition Clean Baltic
CIPRA Slovenia
The Nature Conservancy
Lithuanian Ornithological Society
CIPRA International
Calla - Association for Preservation of the Environment
The Green Tank
Verband der deutschen Höhlen- und Karstforscher e.V.
CIPRA Deutschland
EUROPARC Federation
Fern
EuroNatur