



NATURE RESTORATION PLAN DEVELOPMENT PROCESS IN EU MEMBER STATES

Mid-term assessment

#RESTORENATURE



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ABOUT THE #RESTORENATURE CAMPAIGN

The **Restore Nature** campaign, coordinated by WWF European Policy Office, Birdlife Europe and Central Asia, European Environmental Bureau and ClientEarth, brings together over 200 NGOs and multiple stakeholders such as businesses, scientists and activists, who have been jointly advocating for the Nature Restoration Regulation. The campaign collected almost 1.2 million signatures and messages from citizens who urged decision-makers to adopt the law to restore nature, with the support of organisations such as Avaaz and WeMove.



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GLOSSARY

CAP: Common Agricultural Policy

CFP: Common Fisheries Policy

FRA/FRAs: Favourable Reference Area(s)

FRV/FRVs: Favourable Reference Value(s)

INTERREG: EU Interreg cross-border cooperation programme

HD: Habitats Directive

LIFE: EU LIFE programme (funding instrument)

MFF: Multiannual Financial Framework

NGO: Non-governmental organisation

NRPP/NRPPs: National and Regional Partnership Plan(s)

NRL: Nature Restoration Law, also referred to as Nature Restoration Regulation

NRP: Nature Restoration Plan (plural NRPs)

SML: Soil Monitoring Law

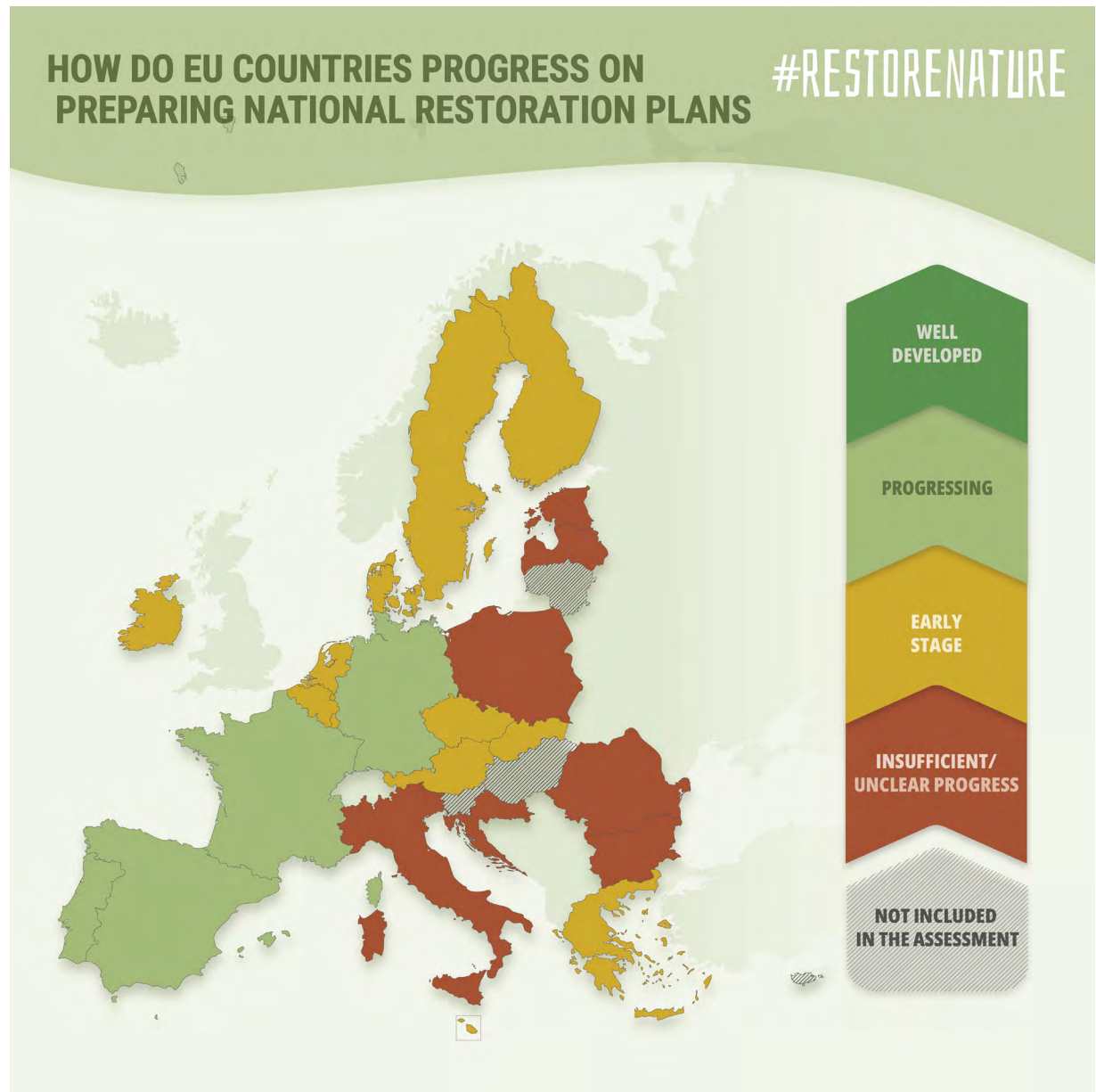
EXECUTIVE SUMMARY

The EU Nature Restoration Law (NRL), in force since August 2024, is a generational opportunity to stop and reverse ecosystem degradation at scale. By setting legally binding restoration targets, it can help recover Europe's lost habitats and species, protect us from extreme weather events, and deliver immense health and economic benefits. This is why the law has drawn broad support from scientists, civil society organisations, businesses, youth, and other stakeholders across Europe.

Yet, the promise of the NRL will only materialise if Member States deliver on the ground. National Restoration Plans (NRPs) are the key instruments for implementation: each Member State must submit a draft NRP by 1 September 2026 and a final version by September 2027, setting out restoration priorities, measures, funding and governance up to 2050.

This report presents a mid-term assessment of Member States' progress in preparing credible NRPs. It covers 23 of the 27 Member States and reflects the situation as of September-October 2025.¹ Using a harmonised NGO-led methodology, it evaluates four enabling conditions for credible NRPs: (1) science base (use of best-available knowledge and data), (2) ambition (vision and scope), (3) inclusiveness (participation and transparency), and (4) empowerment (political buy-in, coordination and resources). Country scores are presented in EU overview maps and detailed national factsheets.

¹ Scope of the assessment: The survey covered 23 out of 27 Member States: Austria (AT), Belgium (BE), Bulgaria (BG), Czech Republic (CZ), Germany (DE), Denmark (DK), Estonia (EE), Greece (GR), Spain (ES), Finland (FI), France (FR), Croatia (HR), Ireland (IE), Italy (IT), Luxembourg (LU), Latvia (LV), Malta (MT), Netherlands (NL), Poland (PL), Portugal (PT), Romania (RO), Sweden (SE), Slovakia (SK). Four EU Member States are not included: Cyprus, Hungary, Lithuania and Slovenia.



Key findings

NRP preparation has started in the majority of Member States, but progress is uneven and, overall, insufficient so far to secure NRPs that deliver on the ground. Across all four criteria, most countries are classified as showing “insufficient/unclear progress” or being at an “early stage”, while a small group of frontrunners prove that transparent, science-based, inclusive and better resourced drafting processes are feasible.

Only a handful of Member States (such as **Czechia, Germany, Finland, France, Portugal** and **Spain**) have developed a solid **science base** for NRP preparation. Many remain at an early stage in identifying and addressing knowledge gaps, involving scientific institutions, and establishing robust reference values to guide their plans. In some countries, reference areas and targets risk being set on political rather than scientific grounds, lowering ambition and locking in conservative baselines.

Ambition remains limited. **Portugal** is currently the only country presenting its NRP as a national strategic restoration plan with broad coverage of ecosystems and NRL targets, **while Croatia** and **Germany** show growing ambition. In most countries, NRPs are framed as narrow compliance exercises, with tight or delayed timelines. Such early signs **show that some Member States are aiming for** minimal implementation rather than using the NRL to drive structural change.

At mid-term, **inclusiveness** varies widely. **France** and **Germany** already demonstrate well-developed, inclusive processes, with several others (**Czechia, Finland, Ireland, Spain, Sweden**) showing progress. However, in many countries opportunities for public participation are limited or absent, transparency about stakeholder working groups is lacking, and it is unclear how inputs will be used. No Member State had published a full draft NRP for public consultation at the time of the assessment.

Empowerment, meaning that NRPs include political buy-in, coordination and resources for the NRP process, is the weakest area overall. Only **France, the Netherlands, Germany** and **Spain** are classified as “progressing”; all others show only preliminary or incomplete signs of political endorsement and resourcing. Dedicated budgets and staff for NRP preparation are often missing, coordination across ministries and levels of government is uneven, and communication on proposed measures, benefits and fair implementation remains very low, risking weak public support.

Table 1: Assessment of Member States’ NRP development process, as of September – October 2025: number of Member States in each score category.

MID-TERM ASSESSMENT CRITERIA				
SCORE CATEGORY	SCIENCE BASE	INCLUSIVENESS	AMBITION	EMPOWERMENT
not in place	5	8	9	8
early stage	12	8	11	11
progressing	4	5	2	4
well developed	2	2	1	0
TOTAL	23	23	23	23

Major delays in preparation, combined with insufficient capacity, incomplete data and low political priority, risk pushing some draft NRPs beyond the 2026 deadline or forcing rushed, low-quality processes. This would reduce the European Commission's time to assess plans and address observations for improvements where EU restoration targets are at risk. If current trends continue, many NRPs may meet only the bare minimum legal requirements and fall short of the NRL's objectives.

Priority actions

Based on these findings, the #RestoreNature coalition recommends the following actions.

Member States should:

- **Accelerate NRP preparation and boost resources:** Ensure draft plans are ready by September 2026 without compromising quality, participation or ambition. This requires additional financial (both domestic and EU), human and technical capacity at national and subnational levels.
- **Strengthen scientific rigour and ambition:** Use the latest and most comprehensive evidence, address critical data gaps, establish science-based reference values and targets, and cover all relevant ecosystems rather than focusing on minimum compliance. Prioritise areas and actions where maximum ecological, climate, and socio-economic outcomes can be achieved.
- **Open up and empower the process:** Improve transparency, design inclusive and balanced stakeholder consultations, and ensure strong cross-sector and multilevel coordination.
- **Build public and political support for nature restoration:** Develop strong, evidence-based communication and engagement strategies that highlight tangible benefits of restoration such as flood protection, fire prevention, climate resilience and community wellbeing, and showcase flagship restoration projects at scale to create pride, ownership and broad buy-in.

The European Commission should:

- **Ensure transparency and comparability:** Regularly assess and publish progress on NRP preparation and encourage common templates and indicators to facilitate EU-level assessment of ambition and consistency.
- **Strengthen coordination, guidance and support:** Provide methodological guidance on scientific and consultation standards, targeted technical assistance and peer-learning, and help Member States use existing EU funds while securing additional and targeted restoration financing in the next MFF.
- **Reinforce monitoring and enforcement:** Develop a robust EU monitoring framework for NRP quality and implementation, take decisive enforcement measures in case of insufficient or improper implementation, and promote policy coherence and transboundary cooperation for shared ecosystems.
- **Lead a positive EU-wide narrative on restoration:** Support Member States with clear messages, communication guidance and campaigns that highlight the concrete benefits of nature restoration, amplify inspiring flagship projects across Europe, and help build broad public and political backing in a challenging context.

With thoughtful implementation, the Nature Restoration Law can result in thriving rivers and wetlands, healthier seas, or greener cities - improving daily life for millions today and for generations to come. Realising this vision requires commitment, collaboration, and follow-through at all levels, with Member States and the European Commission leading the way. The findings of this report are a call to action. The encouraging precedent set by a few countries shows what is possible; the task now is to replicate and elevate that level of preparation everywhere, without delay for the benefit of nature and people.

INTRODUCTION

Context

The Nature Restoration Regulation (EU) 2024/1991 (hereafter “Nature Restoration Law” or “NRL” or “the Regulation”), in force since August 2024, is the first EU-wide legislation to set binding, time-bound targets to restore degraded ecosystems across all Member States. It requires restoration measures on at least 20% of the EU’s land and sea areas by 2030, and for all ecosystems in need of restoration by 2050, with specific targets for terrestrial, coastal and freshwater, marine, urban, agricultural and forest ecosystems, as well as for pollinator populations.

Implementing the Nature Restoration Law is expected to generate substantial environmental, social and economic benefits. Restored ecosystems improve water quality, reduce flood and drought risks, support food security and strengthen climate resilience.^{2,3,4}

Evidence shows that every euro invested in ecosystem restoration can generate returns of between €8 and €38 in economic, social and environmental value, through improved ecosystem services, avoided damage costs and new green job opportunities.⁵ Effective implementation is therefore not only a legal obligation, but also a strategic investment in Europe’s long-term wellbeing and resilience.

National Restoration Plans (NRPs) sit at the core of this implementation architecture. They are the tools through which Member States must translate the Regulation’s obligations into a coherent, long-term, adequately funded roadmap up to 2050 (reflecting the timeframe of the EU’s overarching ecological and climate objectives, including the goal to restore all ecosystems in need by mid-century). Through their NRPs, Member States must establish how they will identify priority areas, choose restoration measures, mobilise funding and organise implementation across sectors and levels of governance.

The NRL also lays down detailed requirements on planning, monitoring, reporting and review, making NRPs a key instrument for transparency and accountability in implementation. Member States are required to submit their draft NRP by 1 September 2026. Based on feedback provided by the European Commission, Member States will need to adapt⁶ and submit their final NRP by September 2027.

² European Commission (2022). *Commission staff working document – Impact assessment accompanying the proposal for a Regulation on nature restoration (SWD(2022) 167 final)*. Brussels: European Commission. Available at : <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022SC0167>

³ Institute for European Environmental Policy (IEEP). (2022). *The proposed EU Nature Restoration Regulation: The path to nature’s recovery*. Brussels. Available at : <https://ieep.eu/wp-content/uploads/2022/12/FINAL-IEEP-First-impressions-of-the-EU-Nature-Restoration-Law-policy-brief.pdf>

⁴ EEA (2023). *The importance of restoring nature in Europe*. Brussels. Available at : <https://www.eea.europa.eu/en/analysis/publications/the-importance-of-restoring-nature-in-europe>

⁵ European Commission (2022). *Impact Assessment Report accompanying the Proposal for a Regulation on Nature Restoration (SWD(2022) 167 final)*, Brussels. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022SC0167>

⁶ According to obligations described in NRL Article 17.

If NRPs are weak, opaque, late or shaped by short-term interests, the Regulation’s objectives will not be met. This would jeopardise the EU’s commitments to halt and reverse biodiversity loss and to implement the EU Biodiversity Strategy for 2030 and the Kunming Montreal Global Biodiversity Framework. It would also undermine the pathway set by the European Climate Law towards at least 55% net emission reductions by 2030 and climate neutrality by 2050, which also relies on healthy, resilient ecosystems.

The implementation phase is unfolding in a challenging political context. Across Europe, environmental policies face renewed attacks, calls for deregulation and attempts to re-open or stall agreed measures. In this climate, there is a real risk that NRPs become a tick-box exercise limited to repackaging existing measures, overusing derogations or postponing action beyond 2030, instead of driving the structural changes that the NRL requires. A strong, public, civil-society-led scrutiny of the NRP preparation process is therefore essential to safeguard the Regulation’s integrity, maintain public trust and support those authorities working to deliver ambitious restoration.

Environmental NGOs have joined forces as the #RestoreNature coalition to follow the implementation of the NRL and the preparation of NRPs. In 2024, the coalition published “guidance and recommendations”⁷ to support national NGOs, governments and other stakeholders in shaping robust NRPs. In 2025, WWF EU, BirdLife, EEB and ClientEarth coordinated this first mid-term assessment of NRP development, carried out by national partner organisations across the EU. With this report, the coalition assumes its shared responsibility to help ensure that the NRL is implemented in line with science, the public interest and the spirit of the democratic mandate that delivered it. A second assessment is planned for September 2026 when the draft NRPs are due.

Objectives

This report presents a mid-term assessment of how EU Member States are progressing in the preparation of their NRPs as of September-October 2025, midway between the NRL’s entry into force and the deadline for draft NRPs. It examines whether the processes and enabling conditions now in place are fit to produce strong NRPs. Specifically, the report seeks to:

- track progress of NRP preparation;
- showcase good practices and positive examples that can be replicated and scaled up;
- highlight gaps and shortcomings which risk weakening implementation; and
- provide timely, evidence-based recommendations to national authorities and the European Commission ahead of the 2026 draft NRPs.

This is a **process-focused assessment**, examining whether Member States provide conditions for strong NRPs; it is not an analysis of the ecological adequacy of the plans themselves (for which a second assessment is planned for late 2026). Above all, this report is a tool to drive higher ambition, greater transparency and stronger accountability, so that NRPs become credible national roadmaps capable of delivering real restoration outcomes on the ground.

⁷ Aubert G., Underwood E., Leemans S., Ruyschaert S. and Agapakis I. 2024. *Guidance and recommendations for ambitious Nature Restoration Plans*. IEEP. Brussels, Belgium. <https://www.restorenature.eu/en/our-work-past-actions/report-guidance-and-recommendations-for-ambitious-nature-restoration-plans>

METHODS

Scope of the assessment

The assessment examines the progress of national NRP development processes across four criteria:

1. **The science base** of the process assesses whether NRP preparation is grounded in robust scientific input and use of best evidence to address knowledge gaps, define reference values, and **list the most** relevant restoration methods. This reflects *inter alia* NRL Recital 65 and Article 14(1) on using the latest scientific evidence.
2. **The inclusiveness criterion** assesses whether NRP preparation is open, transparent and participatory, in consistency with Article 14(20), including early and effective opportunities for public and stakeholder involvement and disclosure of how inputs are considered.
3. **The ambition criterion** assesses how Member States endorse the NRL's vision for restoration or conversely use flexibilities of the NRL to delay or dilute action. This criterion looks at the timeliness of NRP preparation, structural improvements, use of derogations, public framing and early actions of accelerating or scaling up measures.
4. **The empowerment criterion** examines whether NRP development is backed by political and administrative buy-in and the necessary enabling conditions. This entails coordination across levels of government, cross-sectoral engagement, clear supporting measures, and adequate financial and human resources.

Assessment methods

Each criterion was assessed using four to six indicators, each scored on a 0-4 scale. A score of 0 represents no action, action with a clearly negative effect or information that is not known or not provided. A score of 4 indicates clear, comprehensive and effective action or full commitment. Scores of 1 to 3 are used when action is partial, incomplete, inconsistent, or insufficient. Specific data were collected for each indicator and used to fact-check and determine the relevant score. The scores for all indicators within a criterion are summed to obtain that criterion's score, with all indicators weighted equally. The four criteria are also weighted equally in the final result: the overall score for each Member State is calculated as the average of the four criterion scores. This reflects the assumption that science base, inclusiveness, ambition and empowerment are equally essential enabling conditions for strong NRPs.

DATA COLLECTION AND REVIEW

Data were collected in a two-step procedure by national NGO coalitions across the EU through interviews with public administration representatives, participation in official events, and/or publicly available information. Data were mainly collected at the national level, except for Belgium,⁸ where federal and regional competences required a tailored approach. National NGOs then applied the scoring framework (0-4 per indicator). All national assessments underwent an external review for completeness, consistency and adherence to the scoring guidance. Reviewed assessments were returned to national focal points for further review and data checking.

DATASET

The assessment covers 23 out of the 27 EU Member States.⁹ For some indicators information was not available or could not be identified at the time of assessment; these entries were marked as 'unknown'. Data are complete for six Member States, while in the remaining seventeen, one or more indicators remain unverified and are reported as unknown.

DATA INTERPRETATION AND LIMITATIONS

The findings reflect the situation in late September and early October 2025 (with reference dates varying slightly by country). They provide a snapshot based on the best information accessible to national NGOs at the time of data collection, using a harmonised methodology. However, any direct comparison between Member States should be done carefully as differences may result from differences in transparency and access to information, variations in national governance structures and timelines, and/or differing levels of NGO capacity and engagement. Unknown values and information gaps should be considered when interpreting results, as it reflects the level of information currently accessible at this stage of the NRP development.

Presentation of results

The results are provided in two complementary formats:

1. An EU-level overview of NRP development progress, presented in this report, including maps illustrating relative progress across Member States.
2. National factsheets with tailored findings and recommendations for Member States where NRP development has progressed enough to allow for a structured analysis and where information was available at a level of detail that makes such guidance useful. These country factsheets can be accessed through #RestoreNature website.¹⁰

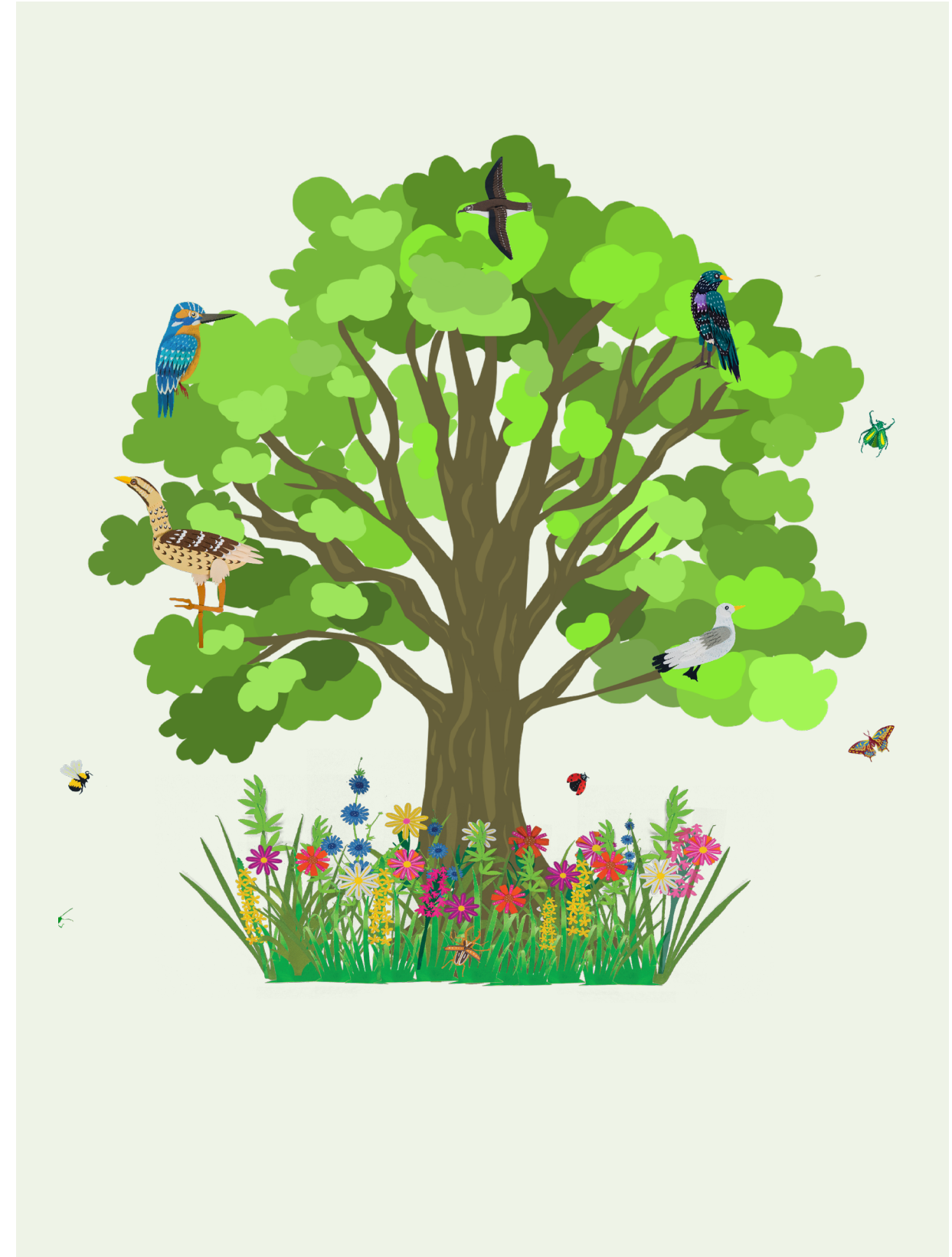
⁸ Data were collected at the national level except in Belgium where Regions and the Federal level share responsibilities in the drafting and implementation of the NRP. In this case, the assessment was done for each administrative region (Wallonia, Flanders, Brussels-Capital) and at the federal level, and a total score was calculated with the following formula: [Belgium score = 0.3 x Wallonia score + 0.3 x Flanders score + 0.3 x Federal score + 0.1 x Brussels region score].

⁹ The survey covers 23 out of EU27 Member States: Austria (AT), Belgium (BE), Bulgaria (BG), Czech Republic (CZ), Germany (DE), Denmark (DK), Estonia (EE), Greece (GR), Spain (ES), Finland (FI), France (FR), Croatia (HR), Ireland (IE), Italy (IT), Luxembourg (LU), Latvia (LV), Malta (MT), Netherlands (NL), Poland (PL), Portugal (PT), Romania (RO), Sweden (SE), Slovakia (SK).

¹⁰ National factsheets available at: <https://www.restorenature.eu/en/our-work-past-actions/towards-restoring-nature-in-europe>

Table 2: Criteria and indicators used to assess the NRPs' mid-term development processes

ASSESSMENT CRITERIA	INDICATORS	DESCRIPTION OF THE INDICATOR
SCIENCE-BASED PLAN	1. Filling knowledge gaps	Assesses whether competent authorities have identified the most important knowledge gaps to inform the NRP and taken active measures to fill them.
	2. Scientific involvement	Evaluates the consultation of relevant knowledge partners (e.g. research institutes, academics, species conservation organisations, practitioners) in early NRP development
	3. Use of best evidence	Assesses the use of best available scientific evidence in the process of drafting NRPs restoration approaches and measures.
	4. Reference values setting	Measures the extent to which coordinating authorities have been developing national reference values for all the NRL's area- and indicator-based targets for which no reference values were in place yet.
INCLUSIVE PLAN	1. Consultation opportunities	Assesses whether the public (citizens and relevant stakeholders) are given early and effective consultation opportunities during NRP preparation.
	2. Stakeholder involvement	Assesses whether the NRP preparation process engages all relevant stakeholder groups.
	3. Openness to evidence	Assesses whether authorities have issued an open call for written evidence (and/or equivalent mechanisms) to inform NRP drafting.
	4. Openness to dialogue	Assesses efforts by coordinating authorities to foster equal and balanced dialogue between stakeholders, or concrete plans to do so.
	5. Openness to public	Assesses the publication (or concrete plans for publication) of a full draft NRP for public consultation.
	6. Impact assessment	Assesses the publication (or concrete plans for publication) of a full strategic impact assessment of the draft NRP.
AMBITIOUS PLAN	1. Framing	Assesses whether public authorities present the NRP as a national strategic opportunity rather than a burden.
	2. Urgency	Assesses the pace of NRP development and consultation and the likelihood of meeting the legal deadline for submitting the draft NRP.
	3. Scope	Assesses whether authorities intend the NRP to cover all relevant NRL ecosystem targets or only a limited subset.
	4. Derogations	Assesses declared intentions regarding the use of derogations and flexibilities under the NRL.
	5. Anticipation	Assesses efforts to accelerate and/or scale up previously agreed restoration measures ahead of NRP adoption to achieve 2030 targets.
EMPOWERED PLAN	1. Multi-level buy-in	Assesses the extent of buy-in for NRP development across key authorities (national, regional/local and, where relevant, cross-border).
	2. Communication	Assesses proactive communication by authorities to the public and key stakeholders on envisaged NRP measures, their necessity, benefits and fair implementation.
	3. NRP development capacity	Assesses the level of additional financial, technical and human resources invested in NRP preparation on top of existing obligations.
	4. Financial urgency	Assesses efforts to identify short-term resource needs and gaps for NRL implementation, and to put in place measures to meet them ahead of NRP adoption in late 2027.

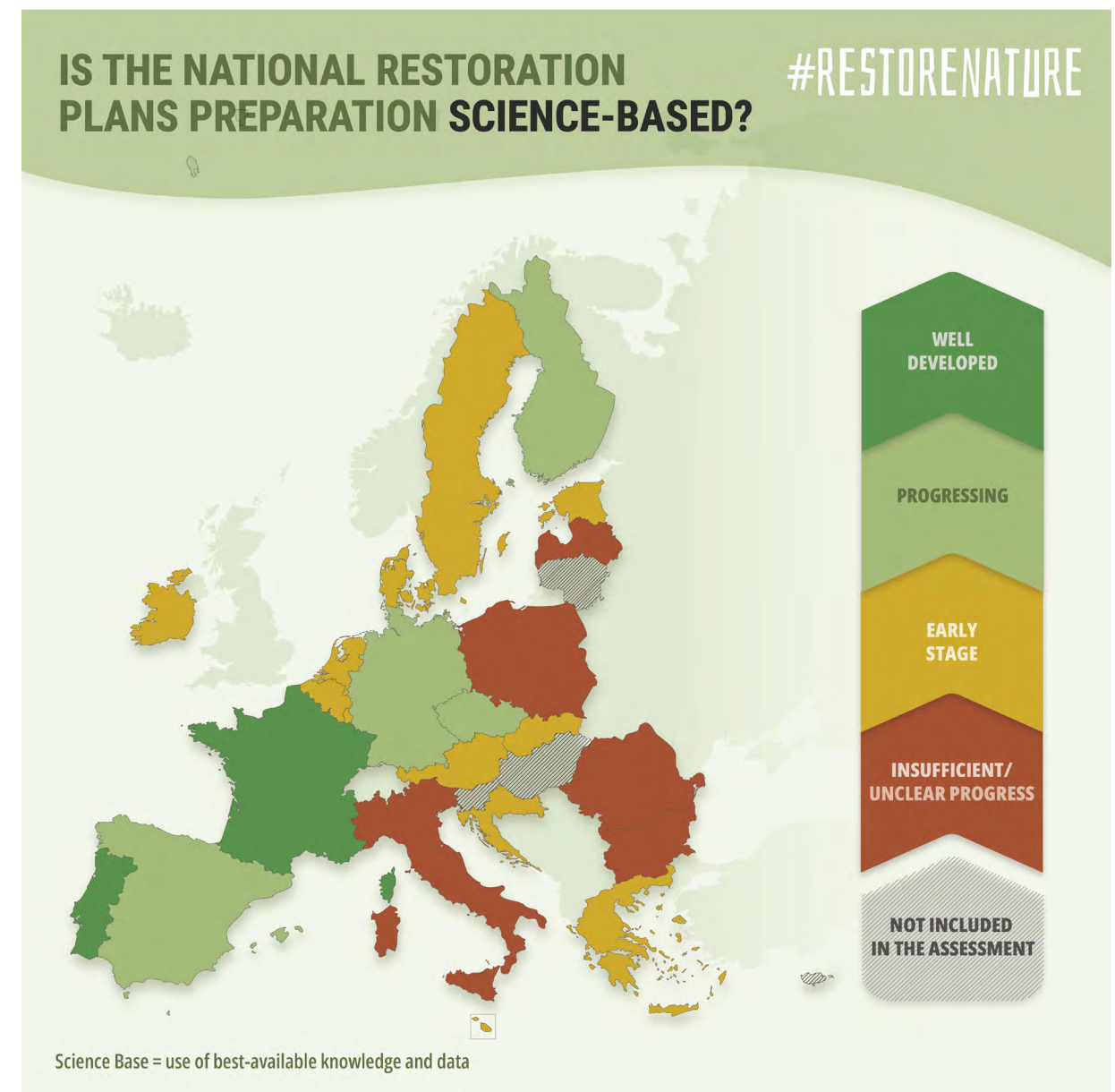


MID-TERM ASSESSMENT RESULTS AT THE EU LEVEL

Science base of NRP preparation

This criterion assesses the science base of NRPs preparation process, based on four aspects: the identification and filling of knowledge gaps, the scientific involvement, the use of best evidence, and the setting of reference values based on scientific data.

The science base of NRP preparation process appears to be uneven across Member States. Six Member States already have a well-developed science base or are progressing towards it (**Czechia, Germany, Finland, France, Portugal and Spain**). Twelve Member States are still at an early stage of developing a science-based NRP (**Austria, Belgium, Croatia, Denmark, Estonia, Greece, Ireland, Luxembourg, Malta, The Netherlands, Sweden and Slovakia**). For **Bulgaria, Italy, Latvia, Poland and Romania** available information is currently insufficient to allow a robust assessment.



IDENTIFYING AND FILLING KNOWLEDGE GAPS

This indicator highlights whether competent authorities have identified the most important knowledge gaps to inform the NRP and taken active measures to fill them.

Assessments indicate that several Member States have taken concrete steps to identify and address knowledge gaps relevant for NRP preparation. The approach to knowledge gaps is rated 'well developed' in **Czechia, Germany, Finland and France** and 'progressing' in **Belgium** (with the rating mainly reflecting progress under the marine aspects), **Croatia, Greece, Latvia, Malta, Portugal, Slovakia and Spain**. In these countries, this work is sufficiently advanced to be considered a strong basis for NRP design. The identification and filling of knowledge gaps is supported by knowledge programmes to expand and consolidate data on the location

and assessment of natural habitats (e.g. in **Czechia, France, Germany**); improvement of access to environmental data and maps (**Spain**); and publication of guidelines for ecological restoration along with key challenges and knowledge gaps for developing and implementing the NRP (**Spain**). Yet, in some countries, delays in NRP preparation may still hinder the identification and filling of gaps, reducing the likelihood of meeting the 2026 deadline with robust evidence.

However, progress for identifying and filling knowledge gaps remains partial or unclear in **Austria, Denmark, Estonia, Ireland, Italy, Poland** and **Sweden**. Overall, there is a lack of transparency around the process of identifying and addressing knowledge gaps. Incomplete data or insufficient data quality for specific areas/ecosystems/species are spotted in **Austria, Czechia, Greece, Ireland, Latvia, Poland, Spain, Slovakia**, and **Sweden**. In some cases, data gaps have been identified but have not been acted upon, with few or no measures in place to close them (**Belgium, Portugal, Malta, Sweden**). With the exception of **Belgium's** marine plan, marine ecosystems have been so far insufficiently addressed.

Further progress is needed on scientific methods to assess the state of ecosystems, data collection, and on the knowledge base for restoration purposes (e.g. in **France, Germany**, and **Spain**). Another risk lies in the reframing of key definitions which may reduce the ambition of nature restoration, e.g. in **Finland** NGOs are concerned that the ongoing process could lead, in the worst case, to re-defining the Favourable Reference Areas for the habitat types like Western Taiga, with the aim of restoring less area than needed. These weaknesses risk locking NRPs into conservative baselines and lower ambition, particularly where reference values and restoration needs depend on data that are not yet secured.

Data were insufficient to assess the progress made for the identification and filling of knowledge gaps in **Luxembourg**, the **Netherlands** and **Romania**.

SCIENTIFIC INVOLVEMENT

This indicator evaluates the consultation of relevant knowledge partners in early NRP development (e.g. nature restoration research institutes/academics, species conservation organisations, practitioners).

Twenty Member States are reported to have, at least in part, consulted or involved scientific knowledge partners for the early development of their NRPs, with various modalities of scientific involvement identified across Member States. Recognised scientific institutions are involved in the NRP process in several Member States such as **Sweden, Finland** and **France**. In **Spain**, a scientific advisory group was established to support the development of the NRP.

In **France**, preliminary analytical work for each ecosystem and for pollinator populations was carried out by recognised scientific institutions. This work was then discussed within pre-existing thematic Working Groups (WGs) for each ecosystem (forest, marine, urban, water and agricultural ecosystems) and for pollinators. These WGs functioned mainly as stakeholder fora (with some researchers participating depending on the ecosystem) and information on their composition was not fully publicly available; for example, participation in the agriculture WG appears to have been limited to sectoral organisations, with no NGO representation. At

the time of the assessment, three meetings had already taken place for each group, operating similarly: (1) which indicators should be selected; (2) which type of measures should be put forward; (3) which habitats or type of habitats should be prioritised. In addition, specific studies were conducted upon request of the Ministry of the Environment, on methods for evaluating the climate co-benefits and socio-economic impacts of restoration, and on proposals for marine restoration and knowledge gaps.

However, the quality and scope of this involvement often fall short of what is needed for robust, science-based plans. Reported issues include a lack of transparency regarding which institutions are involved and on what basis (**Austria, Bulgaria, Estonia, Italy, Malta, the Netherlands, Poland**). The selection of knowledge partners may exclude some relevant actors to participate in the process, such as other scientific institutions (**Spain**) or environmental NGOs not being invited as knowledge partners while they do have significant knowledge background (**Bulgaria, Denmark, Italy, Ireland, the Netherlands**), or there might be an insufficient number of knowledge holders involved (**Greece**).

Unclear modalities of participation (whether only for information, consultation or an actual role in decision-making) and lack of a clear procedure for the integration of contributions may hinder active participation (**Austria**). In some cases, as in **Croatia** and **Ireland**, the NRP drafting process tend to be dominated by government bodies and there has been limited engagement with non-governmental bodies and academics. In a few Member States, such as **Greece** and **Latvia**, there is no publicly available information on whether scientific consultation has started or is delayed.

USE OF BEST EVIDENCE

Coordinating authorities need to use the best available scientific evidence in the process of drafting NRP's restoration approaches and measures.

The use of best scientific evidence to design restoration approaches and measures is well developed or in good progress in **Czechia, Denmark, France**, and **Portugal**. However, in Member States where the process of the NRP preparation is still in its early phases, scrutiny on the actual use of scientific data should be maintained.

There is incomplete progress regarding the use of best scientific evidence at this stage in **Austria, Belgium, Germany, Estonia, Finland, Spain**, and **Sweden**. The risk of biased approaches is a major concern. In Sweden, authorities have indicated that they will base restoration measures in key habitat types on revised reference values that deviate wildly from the calculated RVs based on a scientific basis that authorities presented in 2024, leading to a very low level of ambition in restoration of grassland, wetlands and forest habitats. In **Germany**, despite existing scientific data, there does not seem to be a scientific approach to set quantitative targets to reverse the decline of insects, farmland birds, and degradation of marine habitats.

In most Member States, the available information (and thus transparency) at this stage is insufficient to assess the use of best scientific evidence (**Bulgaria, Croatia, Ireland, Italy, Latvia, Luxembourg, Malta, the Netherlands, Poland, Romania** and **Slovakia**).

REFERENCE VALUE SETTING

Coordinating authorities need to develop national reference values for all the NRL's area- and indicator-based targets for which no reference values were in place yet.

The process of reference values setting appear to be well developed in **Croatia, France, Germany and Spain**.

It is partially developed in **Luxembourg, the Netherlands, Portugal and Slovakia** and is still at an early stage, incomplete or problematic in **Austria, Belgium, Czechia, Denmark, Estonia, Finland, Ireland and Sweden**.

The main problem reported by national NGOs relates to the setting of Reference values which risk being defined politically, subject to negotiation or influenced by stakeholders instead of being based on best available scientific data. This includes for example the use of older values instead of the more recent ones or setting references below the current values to reduce the level of ambition. Such concerns are reported in **Austria, Ireland, Finland, and Sweden**.

According to national NGOs, in Ireland, many of the FRAs that were submitted to the Commission do not fully represent the area of Annex I habitat that has been lost due to the ineffective implementation of the Habitats Directive. They also fail to consider habitat loss prior to the HD, ecological coherence or the requirements of Art 14 i.e. historical distribution and the projected changes to environmental conditions due to climate change.

In **Sweden**, for key habitats (forests and grasslands), the government has chosen to report FRAs based on estimations of the areas in 1995 without regard to ecological need and the requirements to use best available information.

In **Finland**, the government has decided - without any consultation or participation - that the restoration needs of habitat types will primarily be compared to the area of each habitat type in 1995, when Finland joined the EU, instead of using science-based FRAs. This reduces the ambition of nature restoration. For example, for Western Taiga that is one of the widest Natura habitat types in area in Finland, the favourable reference area based on the scientific evaluation is 3.7 million hectares whereas the 1995 area would be 1.7 million hectares.

Some Member States, such as **France**, may decide not to include reference values in the 2026 NRP, delaying the reference values setting. Another difficulty for Reference values setting can be the lack of knowledge for specific ecosystems. In France, there is no national scientific consensus on good ecological status and favourable reference areas for marine habitats, and unless a scientific consensus is established, the current proposal is to set the values to zero.

Data were insufficient to assess the process of reference values setting in **Bulgaria, Greece, Italy, Latvia, Malta, Poland and Romania**.

IMPLICATIONS

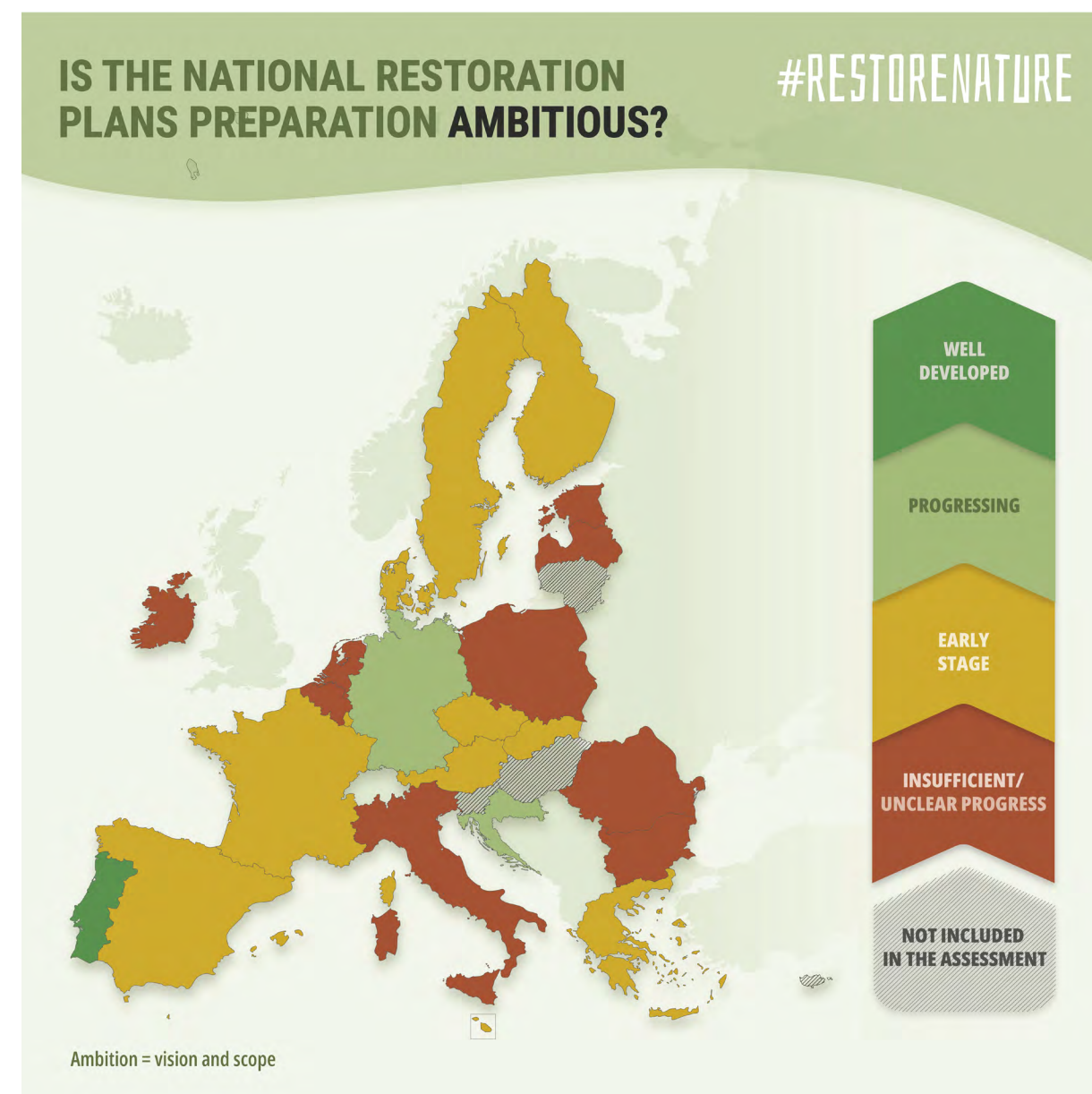
Taken together, these findings confirm that scientific robustness is a critical bottleneck for credible NRPs. Strengthening transparent, participatory and well-resourced scientific processes in the coming months is essential if Member States are to turn the NRL's obligations into restoration plans capable of delivering measurable nature recovery. Seven Member States show the way with broad and transparent efforts to build science-based NRPs.

Level of ambition in NRP preparation

This criterion assesses how Member States are defining the strategic purpose and scope of their NRPs and making progress in the drafting process. The analysis draws on five indicators reviewed by national NGOs: political framing, urgency of the process, breadth of restoration scope, expected use of derogations and early anticipatory action.

At the mid-term point, ambition remains mostly at an early stage across the EU. Only **Portugal** currently demonstrates a well-developed approach characterised by a clear strategic framing of the NRP, broad restoration scope and advanced stage of NRP drafting. **Croatia and Germany** show substantial progress, with coherent planning arrangements and early signals of broader restoration scope, although timelines and coordination will require acceleration.

In the **majority of assessed Member States**, ambition is at an early development stage, with limited communication, fragmented planning or insufficient clarity on how restoration will be scaled up to meet the NRL's objective. In several Member States, ambition is not yet in place, with low visibility of the process, restrictive interpretations of obligations or early indications that implementation may focus on minimum compliance.



FRAMING OF THE NRP

Framing refers to how public authorities position the NRP politically and publicly: as a strategic national opportunity, a compliance exercise, or choose not to communicate at all. This framing strongly influences cross-sector buy-in, public perception and future implementation.

Portugal and **Croatia** publicly present the NRP as a national strategic priority linked to climate resilience and socio-ecological benefits. This provides a clear political mandate for restoration planning. In **Austria, Belgium, Finland, France, Germany, Latvia** and **Spain**, restoration is sometimes framed constructively, but communication framing differs between levels of government or across ministries, which results in mixed signals about ambition and expected outcomes.

In **Bulgaria, Denmark, Greece, Ireland, Italy, Luxembourg, Malta, the Netherlands, Poland, Romania** and **Slovakia**, NRPs are largely presented as administrative obligations or minimum-compliance exercises. In these countries engagement remains limited, and messaging is mainly technical. Contrasts are identified in several Member States between Ministries, who may only participate reluctantly or frame the NRP negatively in their communication.

In **Estonia** and **Czechia**, no public communication has taken place so far, making it unclear whether this reflects delays, low transparency, or an absence of political prioritisation.

URGENCY

Urgency reflects whether Member States are progressing at a pace that allows robust planning and meaningful participation ahead of the September 2026 deadline to finalise draft NRPs. **Denmark, France, Malta, Portugal** and **Sweden** have established planning arrangements and are advancing work in a structured manner.

In **Austria, Czechia, Finland, Germany, Greece, Ireland, Luxembourg, Latvia, the Netherlands** and **Romania**, work is underway, but progress is slow or variable, raising the risk that consultation and technical work become compressed in 2026. Timelines remain tight and will require acceleration. Significant delays are observed in **Belgium, Spain, Croatia** and **Slovakia**, indicating that work must be significantly accelerated to meet the deadline for submitting a draft NRP by 1 September 2026. For **Bulgaria, Estonia**, and **Italy** information remains insufficient to assess progress.

SCOPE

Scope assesses whether Member States are preparing NRPs that cover all relevant ecosystems and targets, as required by the NRL, rather than limiting efforts to a narrow subset or existing measures.

According to national NGO assessments, only **Czechia, Croatia, Germany, Malta** and **Portugal** have so far clearly signalled an intention to develop NRPs covering most or all ecosystem targets. In **Czechia**, the high score on scope reflects the fact that the coordinating authorities

have proposed to meet all NRL requirements, even though coordination and allocation of responsibilities across ministries remain unclear and challenging.

In many other Member States, NGOs express low to moderate confidence that the full scope of the NRPs will be realised (**Austria, Belgium, Estonia, Finland, France, Greece, Ireland, Spain** and **Slovakia**). Concerns relate to limited preparation for certain ecosystems (such as marine or urban areas in **Ireland**), weak or outdated data (see science-based criterion), slow progress in identifying restoration needs and measures, or early political signals suggesting a restrictive interpretation of obligations.

Minimum implementation is foreseen or already announced by authorities in **the Netherlands, Poland, Romania** and **Sweden** with governments indicating that they will restrict themselves to those measures they consider strictly obligatory under the NRL. In Member States where reference values and FRAs are not being set on a robust scientific basis (e.g. **Sweden**), there is a risk that minimum implementation will correspondingly fall short of what is needed to achieve the NRL's objectives. Minimum implementation can also be expected due to major delays in NRP preparation (e.g. in **Romania**). For several Member States, including **Bulgaria, Denmark, Italy, Luxembourg** and **Latvia**, information on the expected scope remains incomplete or unclear at this stage, which itself is a risk for timely and comprehensive coverage.

DEROGATIONS

Only **Portugal** and **Slovakia** have announced intending not to use derogations at this stage. In **Estonia** and **Greece**, discussions are ongoing while thirteen Member States have already indicated an intention to use derogations (**Austria, Belgium, Croatia, Czechia, Denmark, Finland, France, Germany, Ireland, the Netherlands, Poland, Spain** and **Sweden**). The intentions to use derogations are not known in **Bulgaria, Italy, Luxembourg, Latvia, Malta** and **Romania**.

ANTICIPATION

Anticipation captures whether Member States are already accelerating or scaling up restoration measures ahead of NRP adoption, in line with the urgency of meeting 2030 targets.

Clear anticipatory action is visible in **Spain, Croatia** and in specific sectors in **Portugal**, where river restoration programmes are being accelerated ahead of NRP finalisation. Partial, incomplete, upcoming or contradictory actions are observed in **Austria, Czechia, Denmark, France, Italy, Latvia** and **Poland**, where preparatory steps are being taken but do not yet amount to a coherent acceleration of restoration measures.

IMPLICATIONS

Most Member States are still at an early stage in defining ambition, yet a small group of frontrunners is already demonstrating that strategic framing, broad scope and early action are achievable and offer a model for more countries to shift from early planning to progressing or well-developed ambition levels in the coming year.

Inclusiveness of NRP preparation

The NRL outlines different ways in which stakeholders can provide input, including public consultations and open calls for evidence.¹¹ NRPs must also include a summary of the NRP drafting process, including information on public participation and consideration of stakeholders needs. However, the uniform format for NRPs does not define a minimum obligatory level of detail on these aspects.

The analysis of the inclusiveness of the NRP preparation process relies on six indicators: public consultation opportunities, stakeholder involvement, openness to evidence, modalities to support a balanced dialogue, publication of a full NRP draft, and impact assessment.

Member States' efforts towards an inclusive NRP development process vary widely at this stage. The inclusiveness of the NRP drafting is already well developed in **France and Germany**. It is progressing steadily in **Czechia, Finland, Ireland, Spain and Sweden**, although it still needs to be further developed in the coming year – either in number of participants, modalities of participation, or range of stakeholders participating.

An inclusive process is at an early stage or remains incomplete in **Austria, Denmark, Greece, Luxembourg, Malta, Slovakia, Portugal and the Netherlands**. At the time of the assessment, no (or little) inclusive process is known to be in place in **Bulgaria, Poland, Romania, Estonia, Croatia, Italy, Latvia and Belgium**.

¹¹ Recital 82 recalls that EU Member States are parties to the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters. NRL Article 14(20) requires Member States to “ensure that the preparation of the restoration plan is open, transparent, inclusive and effective, and that the public, including all relevant stakeholders, is given early and effective opportunities to participate”.



CONSULTATION OPPORTUNITIES

The NRL requests that public consultation opportunities are organised for all relevant stakeholders.

Early and effective public consultations have been implemented in **Spain, France, Germany and Ireland**. In **Austria**, partial stakeholder involvement began belatedly and no consultation for the wider public had been announced at the time of the assessment. In **Czechia, Greece, Latvia**

and the **Netherlands**, public consultation opportunities have been foreseen or announced but not yet started, and may not cover all NRL articles. In other Member States, there is no announcement of a public consultation yet, or modalities of stakeholder participation are assessed as ineffective.

Five modalities of consultation are identified across Member States: 1. stakeholders' working groups or workshops (**Austria, Bulgaria, Czechia, Finland, France, Germany, Latvia, Poland, Portugal, Slovakia, Spain, and Sweden**); 2. in-person (**France, Greece**) or online (**Germany**) meetings at national and regional level; 3. digital participation on a dedicated website (**France**); 4. contact details provided on the website of the Ministry of the Environment (**Czechia**); and 5. information meetings for relevant sectors (**Luxembourg, the Netherlands**).

In almost all Member States, there is a lack of transparency on how the consultations' outputs will be integrated into the NRPs. Where public consultation is late or not announced yet, there are concerns regarding the actual possibility for such integration during the preparation of the NRPs and the effectiveness of the consultation modalities.

STAKEHOLDER INVOLVEMENT

Recital 83 of the NRL states that the NRP preparation process engage with all relevant stakeholders. According to the assessment, broad stakeholder involvement is identified in **Czechia, Germany, France, Ireland, the Netherlands, Portugal and Sweden**. A partial stakeholder involvement is seen in **Austria, Belgium, Denmark, Estonia, Spain, Finland, Luxembourg, Latvia, Malta and Slovakia**.

Mostly, stakeholder involvement is organised in the form of thematic groups established by relevant Ministries. These working groups can bring together representatives of state administration, unions and associations representing stakeholders such as foresters, farmers, fishers, and other industries, non-governmental organisations, and scientific institutions.

Good practices in terms of stakeholder involvement include an early start of the preparation of the NRP; timeliness of the consultation; open access to the working groups for all relevant stakeholders who wish to participate; specific working groups with relevant stakeholders for each ecosystem; involvement of already existing WGs to discuss key issues and restoration measures ahead of the NRP drafting.

Weaknesses in the stakeholder involvement modalities include: **delays** in publishing a draft NRP or sharing information about its contents; **lack of any or sufficient stakeholder involvement modalities; low frequency** of working groups' meetings; **exclusion (or limited number) of important stakeholders' groups**, e.g. environmental NGOs, nature conservation practitioners, fisheries sector representatives; **confusion between experts' consultation** (to ensure that NRPs are science-based) **versus stakeholders** (which represent specific interests).

Most Member States fail to provide sufficient transparency on working groups' composition, representativeness, and roles. Member States that have implemented or announced public consultations have targeted specific stakeholders' groups and, only in France,

the general public itself. Since consultation of the general public is overall limited, the public awareness of both the preparation of the NRP and the NRL itself across Member States remains very low.

In six Member States, there is no public information about stakeholder engagement (**Bulgaria, Greece, Croatia, Italy, Poland and Romania**).

OPENNESS TO DIALOGUE

The openness to dialogue characterises the coordinating authorities' efforts to foster equal and balanced dialogue between stakeholders.

Efforts to foster such dialogue between stakeholders are assessed by national NGOs as satisfactory in **France, Germany, Ireland, the Netherlands, Spain and Sweden**.

Dialogue between stakeholders is still at an early stage or lack sufficient facilitation in **Austria, Belgium, Czechia, Finland, Croatia, Italy, Luxembourg, Latvia, Portugal and Slovakia**. In various Member States, only some stakeholders are invited to participate (see above), which raises concern regarding the openness to dialogue. When public events are held, the communication about these events is not always very efficient, risking that not everyone interested got to hear about these opportunities. Finding about these events might require some effort, so most likely only the more established stakeholder groups will be best represented (**Finland**).

Within working groups, insufficient facilitation of the debates by the coordinating authorities are seen as a major limitation to dialogue between stakeholders, causing discussions to be unproductive (e.g. in **Czechia**). Outside the expert groups, discussions among stakeholders seem to take place only to a minimal extent.

No dialogue facilitation is known in **Bulgaria, Denmark, Estonia, Greece, Malta, Poland and Romania**.

OPENNESS TO EVIDENCE

This indicator accounts for the release of an open call for written evidence to inform the drafting of the NRP.

At the time of the assessment, five out of the surveyed Member States coordinating authorities have issued an open call for written evidence to inform the drafting of the NRP (**Czech Republic, France, Malta, Spain, and Sweden**).

Where an open call for evidence was released, the modalities of this call appear to be critical for the effectiveness of the process. The most effective open call for written evidence is found in **France**, where stakeholders were invited to submit position papers, and effectively 77 position papers were uploaded from various sectors. On the opposite, in **Czechia**, members of the thematic expert groups were invited to submit proposals for the possible content of the NRP. This was done through a table that group members were expected to fill in. However,

this approach has so far had limited effectiveness: although some stakeholders have recently added suggestions, many parts of the table remain empty.

In some of the Member States, no formal, open 'call for evidence' has yet been conducted but preparatory work was carried out to gather evidence through working groups, scientific studies or knowledge networks.

OPENNESS TO PUBLIC

This indicator looks at coordinating authorities' efforts to publish a full draft NRP for public consultation.

At the time of the assessment, none of the Member States has already published a full draft NRP for public consultation. Fourteen Member States indicate that they intend to publish a draft for consultation (**Belgium, Czechia, Germany, Denmark, Spain, Finland, France, Greece, Ireland, Luxembourg, Malta, the Netherlands, Portugal and Slovakia**).

However, the nature of these intentions varies: in some cases, concrete plans have been publicly communicated, while in others the commitment remains informal or not publicly disclosed. Specific publication dates are announced only in four Member States, between April and August 2026. The lack of information on publication dates could be a problem for stakeholders to organise their participation. Late publication dates are a concern too, because of a lower feasibility of having consultation input included in the NRPs.

In Austria, **Bulgaria, Estonia, Croatia, Italy, Latvia, Poland and Romania**, there is not yet any announcement of a publication.

IMPACT ASSESSMENT

This indicator looks at coordinating authorities efforts to publish a full and strategic impact assessment of the draft plan.

No Member State has published a full and strategic impact assessment of the draft plan yet. Four Member States have announced concrete plans to publish a full and strategic impact assessment (**Finland, France, the Netherlands and Sweden**). However, the publication dates have not been communicated yet. In **Belgium**, partial assessment plans have been announced in Wallonia and Flanders, but not yet at the Belgian federal level and in Brussels-Capital Region.

Seventeen Member States did not provide information about any plans to perform an impact assessment of their draft plan.

IMPLICATIONS

Inclusive modalities have been started in more than half of Member States, with some inspiring examples that show clear and effective modalities, involvement of all stakeholders and early announcement of the publication of a full NRP draft. Other Member States need to start or speed up an inclusive process to ensure cross-sector buy-in, public support and future implementation.

Empowerment of NRP preparation

This criterion evaluates the commitment of Member State authorities to empower large-scale nature restoration, by: 1. proactively managing expectations with the public and key stakeholders on needed restoration measures; 2. engaging responsible authorities at various levels; 3. unlocking sufficient resources for NRP preparation; and 4. freeing up budgets for financing the implementation of nature restoration measures needed to meet 2030 targets.

At the time of the assessment, **France, the Netherlands, Germany and Spain** are progressing while all other assessed Member States only show preliminary or incomplete signs of endorsement and resources.



MULTI-LEVEL BUY-IN

NRP development is a joint effort between responsible authorities at the international, national, regional and local level. The integration of NRP-related responsibilities in all relevant institution is key to ensuring ambitious and effective implementation. At the international level, Article 14(17) requires that Member States ‘...shall, where possible, foster synergies with the NRPs of other Member States, in particular for ecosystems that span across borders or where Members States share a marine region or subregion within the meaning of Directive 2008/56/EC’.

At the national level, the engagement of Ministries and Agencies in charge of various sectors (e.g. farming; forestry; fisheries; energy; economy and finance; climate action; freshwater management; coastal and marine management) will allow important policy synergies and mitigation of potential conflicts with nature restoration measures. Finally, regional and local authorities are in most Member States responsible of, or key stakeholders for, implementing restoration measures.

The multi-level buy-in is well developed in **Denmark, Germany** and progressing in **Austria, Belgium, Czechia, Finland, France, Greece, Ireland, Italy, Luxembourg, Latvia, Malta, the Netherlands, Portugal** and **Sweden**. Four Member States are found to have a very limited or no buy-in across levels yet (**Estonia, Croatia, Romania** and **Spain**). In three Member States, this information was not accessible for NGOs to complete the assessment (**Bulgaria, Poland** and **Slovakia**).

Horizontal buy-in (across Ministries)

Horizontal coordination processes are reported in **Austria, Czechia, Ireland, Italy, Latvia, the Netherlands** where several Ministries or departments within Ministries are participating in the development of the NRP. In some case (**Austria**), a specific steering group for the NRP development process engages with all relevant ministries.

Various shortcomings are found to limit horizontal buy-in in Member States. Some relevant ministries may be less or not involved (for example the Ministry of Finance in **Austria** and **Finland**; authorities working on marine elements of the NRP in **Ireland**) or there might not be sufficient collaboration between ministries and lack of an inter-ministerial working committee (**France**). In some cases, as in **Spain**, authorities may not be reaching consensus, and some may even have openly stated their intention to boycott the implementation of the NRL. Lack of transparency at the inter-ministerial level (**Greece**) or delayed exchanges with other ministries (**Luxembourg**) limit the buy-in progress.

Vertical buy-in (between national/federal and regional levels)

Successful vertical buy-in processes are reported in **France, the Netherlands** and **Spain**. In **Spain** and the **Netherlands** close collaboration brings together competent authorities at the national, regional and even local levels for the NRP development. In **France**, local authorities are associated to prioritise the natural habitats to restore.

Shortcomings that limit vertical buy-in include blockages from regional governments (e.g. in **Spain** and **Austria**); lower involvement, delays or lack of transparency at national, regional and local level (**Austria, Czechia, Germany, Italy** and **Sweden**); disparate participation modalities (e.g. in **Portugal** where some institutions participate in a Working Group while others are members of a Monitoring Committee). Generally – although several authorities are part of the official NRP process, this does not say much about the quality of participation.

Transboundary buy-in

Transboundary buy-in processes related to NRP development are reported in **Czechia**, where there is a continuous exchange between competent ministries and their counterparts in neighbouring Member States, and in **Germany** where transboundary coordination is being organised for marine areas, albeit focusing more on the Wadden sea than on fisheries.

According to current knowledge, NRP development currently appears to be organised primarily at national or sub-national level in **Austria, Greece, France, Latvia, the Netherlands** and **Sweden**. For these Member States no specific new transboundary arrangements or coordination processes linked to NRP preparation have been reported to stakeholders. It is also notable that some important transboundary issues, such as the Odra river in **Germany**, have not yet featured prominently in the NRL discourse. Overall there is still limited visible coordination at international level with other EU Member States, for example in the fisheries sector or more generally between countries which share borders and ecosystems such as **Spain** and **Portugal**.

PROACTIVE COMMUNICATION ON THE CONTENTS OF THE NRP

This indicator looks at Member States’ efforts of communication to the public and key stakeholders on foreseen measures, their necessity, their benefits, and their fair implementation.

None of the Member States is found to communicate at a satisfying level to the public and key stakeholders on the NRP measures, their necessity, their benefits, and their fair implementation at a satisfying level. In eleven Member States (**Austria, Belgium, Czechia, Germany, Denmark, Spain, Finland, France, Luxembourg, Poland, Portugal** and **Slovakia**) there is a partial communication while in the remaining Member States that were assessed (**Bulgaria, Estonia, Greece, Croatia, Ireland, Italy, Latvia, Malta, the Netherlands, Romania** and **Sweden**) there is simply no communication to the public and key stakeholders. Expected consequences can be a lack of understanding or low endorsement of the NRP.

In terms of communication to the public, **France** stands as an inspiring example, with a proactive communication campaign directed to the public through social media and public authorities’ websites. In most Member States, there has been no noticeable active communication campaign directed at the general public concerning the NRL or NRP or these are found to be incomplete (in terms of objectives, measures, targets, and modalities of implementation). In particular, the necessity and benefits of the NRL, and nature restoration in general, should be communicated more. In some cases, a broader communication campaign aimed at the public is planned, but it is not yet clear when and how.

In terms of communication to key stakeholders, engagement with stakeholders has so far been mostly limited to thematic expert groups. Communication to NGOs has, in some cases, only been done in response to NGOs' requests rather than proactively.

NRP DEVELOPMENT CAPACITY

NRP development capacity characterises the level of financial, technical and human resources invested by competent authorities in the NRP preparation process.

The assessment indicates that only two of the Member States (**Spain, France**) have invested sufficient additional resources (e.g. financial, technical, human) in the NRP preparation process so far, on top of existing resource needs. Eight Member States have invested some resources that are perceived by national NGO coalitions as a good start for the drafting efforts, but these resources still need to be increased (**Bulgaria, Germany, Finland, Italy, Malta, Netherlands, Romania and Sweden**). Expected improvement include a better balance of investment between the national/federal level and federal states/regions/provinces, as well as an immediate increase in resources to meet deadlines.

Eight Member States seem not to have invested any dedicated resources, or only insufficient resources (**Austria, Belgium, Czechia, Croatia, Denmark, Greece, Ireland and Slovakia**). In some cases, there is no specific budget allocated to the NRP preparation, resulting in only minimal financial resources being available for the NRP preparation itself at this stage (e.g. in **Austria, Czechia, Croatia, Ireland**). In some Member States, the resources for implementing existing conservation legislation were already perceived as insufficient, and no significant new resources have been created for the NRL implementation.

In terms of human resources, the NRP preparation may be carried out primarily through staff already in charge of other duties (e.g. in **Austria, Belgium, Czechia, Greece, Ireland, Italy, Malta, and Sweden**). Understaffing and resource uncertainty are seen as problematic in achieving a proper NRP preparation in **Czechia, Italy, Malta and Greece**. The lack of funding and human resources is perceived to negatively impact the NRP development process and, in **Ireland**, may even result in stakeholders withdrawing from the process unless greater political leadership and commitment is demonstrated.

The NRP development capacity could not be assessed in **Estonia, Luxembourg, Latvia, Poland and Portugal** due to insufficient transparency.

FINANCIAL URGENCY

This indicator tackles the identification, by Member States, of short-term resource needs and gaps for NRL implementation, and their actions to help meet/fill them ahead of NRP adoption in late 2027.

Six Member States have identified short-term resource needs and gaps for NRL implementation and have partially or fully taken action to provide these resources: **Belgium, Germany, Spain, Italy, the Netherlands and Poland**. In **Belgium**, this currently applies only to the marine aspects. **Germany** has increased its funding for restoration measures of about €1.47 billion till 2028 (overall, not per year) at the national level.

Italy has already identified financial resources in certain existing funds (such as EU Cohesion funds) and is taking steps to secure funding from other funds. In the **Netherlands**, ahead of the NRP submission, the ministry is preparing a request for budget formulated based on the impact assessment done in the end phase of the adoption of the NRL (2024). **Poland** has recognised the significant resource needs for NRL implementation, particularly the lack of a dedicated fund, and has been exploring different financing options. **Austria** commissioned two studies^{12,13} showing that the successful implementation of the NRL requires increased funding and close coordination between the EU, the federal government, and the states. Nevertheless budgets dedicated to nature conservation were recently reduced.

Nine Member States have not identified resource needs yet, or have even recently reduced the budget dedicated to nature conservation (**Czechia, Denmark, Estonia, Finland, France, Greece, Croatia, Sweden and Slovakia**).

IMPLICATIONS

Overall, Member States are not yet providing the political leadership, coordination and resources needed to properly advance NRP preparation. A multi-level buy-in is partially in place in part of the Member States and can be improved especially on vertical and transboundary levels. Communication on foreseen measures, their necessity, their benefits and their fair implementation remain very low, and critically need to be increased in 2026 to increase NRPs' public endorsement.

Since NRL implementation will be very much depending on the provision of sufficient funding, it is therefore quite concerning that many Member States have not identified the short-term resource needs for implementing the NRL or have even taken decisions that reduce the budget dedicated to nature conservation.

¹² Schratzenstaller M, Sinabell F, *Financing the implementation of the Ordinance on the Restoration of Nature With Regard to the Distribution of Tasks and Financing in Austria*, Austrian Institute of Economic Research, 2024. Available at: <https://www.wifo.ac.at/en/publication/268390/>

¹³ Schratzenstaller M, Sinabell F, *Policy Brief: Financing the Implementation of the Ordinance on the Restoration of Nature from an EU Co-financing Perspective*, Austrian Institute of Economic Research, 2024. Available at: <https://www.wifo.ac.at/en/publication/273764/>

CONCLUSION

This mid-term assessment makes clear that while NRP preparations are under way across the EU, overall progress remains limited and uneven. As of September-October 2025, most Member States are still at an early or insufficient stage on the key factors – science base, ambition, inclusiveness, and empowerment – needed for credible plans. If current trends persist, major delays and capacity gaps could push some draft NRPs past the 2026 deadline or lead to rushed, low-quality plans, meeting minimal legal requirements falling short of the NRL’s objectives.

Encouragingly, a handful of frontrunner countries demonstrate that ambitious, science-based and inclusive NRPs are feasible even under today’s political reality. Transparent processes, robust evidence, broad stakeholder engagement and adequate resourcing can be achieved now, offering replicable models for others. Their example shows that the obstacles to strong NRPs are surmountable – the gap is one of political will, not practical impossibility.

Urgent efforts are now needed to bring all Member States’ NRP processes up to a higher standard without resorting to rushed, box-ticking exercises that undermine the quality of the plans, stakeholder participation or overall ambition. As this report recommends, governments should boost the financial, human and technical capacity dedicated to NRP planning so that draft plans are ready by the September 2026 deadline. By streamlining coordination and adding resources, countries currently lagging can catch up while still producing inclusive and robust plans, aligned with the NRL’s requirements.

At the same time, the core enabling conditions for success must be strengthened. This assessment underscores that a strong scientific evidence base, stakeholder involvement, high-level political commitment, and sufficient funding are indispensable for credible NRPs. In practice, these elements are often weakest where they are most needed: political buy-in and resourcing emerge as the most critical gaps, with dedicated budgets, staff, and inter-ministerial coordination missing in many countries. Closing these gaps is essential. Member States must invest in rigorous data and expertise, open up their planning processes to civil society and experts, and secure cross-government support and financing for nature restoration, elevating restoration into a national priority.

Political buy-in and stakeholder support can be significantly improved by prioritising and showcasing areas and actions where maximum ecological, climate, and socio-economic gains can be achieved. Demonstrating and communicating the concrete benefits of nature restoration, such as flood protection, fire prevention and community wellbeing, are essential for effective implementation of the NRL, with sufficient resources and alliances to make it all happen. All this will not only improve each NRP but also build the public trust and momentum required for implementation.

The period until September 2026 when draft NRPs are due represents a strategic window of opportunity to embrace the NRL commitments. There is still time for Member States to raise their ambition and learn from the frontrunners’ good practices. By seizing this opportunity, governments can ensure their draft plans are fit for purpose: science-driven, ambitious in scope, socially inclusive, and backed by political will and resources to put them into action. The European Commission’s support and scrutiny will be pivotal in this next phase, but ultimately each Member State must demonstrate leadership and accountability in delivering a high-quality NRP on schedule.

In sum, the mid-term findings are a call to action. The NRL is a historic chance to reverse ecosystem degradation at scale, but its promise will only be realised through urgent, concerted effort to improve NRP preparation and buy-in across the board. The precedent set by a few countries shows what is possible; the task now is to replicate, be inspired and elevate that level of preparation everywhere, without delay. With renewed commitment, collaboration and follow-through from all levels, Europe can deliver high-quality restoration plans by 2026 – and with them unlock healthier forests, rivers, seas and communities for current and future generations.

RECOMMENDATIONS

The following recommendations are based on the findings of the assessment and aim to address key bottlenecks in the timely preparation of ambitious NRPs, in line with the requirements of the Nature Restoration Law.

Recommendations to Member States

1. Accelerate NRP preparation and ensure sufficient resources

- 1.1. Establish strong coordination and secure political buy-in.** Improve collaboration across all relevant ministries, agencies and levels of government by setting up or reinforcing competent governance structures, such as inter-ministerial working groups or task forces and securing high-level political support and cross-sector commitment.
- 1.2. Increase funding and capacity.** Allocate additional budget and staff for NRP preparation at national and regional levels. Make full use of all funding under the current Multiannual Financial Framework (MFF) and ensure sufficient national funding. **Advocate for dedicated nature restoration funding in the next EU budget (2028-2034)** including reintroducing a separate biodiversity spending target of at least 10% and ensuring a close link between the National and Regional Partnership Plans (NRPPs) and NRL implementation. **Advocate for securing the continuation of LIFE programme** (or at a minimum a dedicated budget line for LIFE actions under the directly managed EU Facility within the NRPPs), so that restoration projects have predictable long-term support.
- 1.3. Accelerate while maintaining quality.** Develop an accelerated **timeline with clear milestones** to bring delayed processes up to speed while preserving quality. Improve efficiency in the drafting and preparation process by developing clearly distinguishable workflows, with dedicated capacity for project management and coordination.
- 1.4. Regularly review progress** to keep the drafting process on track and allow course-correction well before submission deadline.

2. Strengthen scientific rigor and ambition of restoration measures

- 2.1. Build a robust science base: use the latest, most comprehensive scientific data** to inform all aspects of the NRP. Each NRP should clearly document the scientific inputs used and how remaining uncertainties are addressed. Engage independent experts and research institutions early (e.g. via advisory bodies or working groups) and ensure their recommendations are duly considered.
- 2.2. Set evidence-based targets and reference values.** Define Favourable Reference Values (**FRVs**) and quantitative restoration targets as soon as possible, using objective scientific criteria. These targets must reflect ecological evidence and should not be negotiated down due to political or economic pressure.

- 2.3. Cover all ecosystem types and targets required by the NRL;** several frontrunner countries have demonstrated that a broad scope of the plans is feasible and beneficial. **Limit using derogations** or flexibilities to only when scientifically justified and necessary with clear evidence to explain any target exclusion or delay.
- 2.4. Present the NRP as a national strategic priority** (on par with key economic or security plans).
- 2.5. Accelerate the implementation and scale up restoration measures ahead of NRP adoption,** in line with the urgency of meeting 2030 targets. Prioritise areas and measures with the highest ecological, climate and socio-economic benefits.

3. Enhance transparency, stakeholder engagement and public communication

- 3.1. Be transparent about process and progress: regularly publish information** on the status of NRP preparation, including early drafts or outlines. Publicly share how scientific experts contribute (e.g. terms of reference and outputs of scientific committees) and how the drafting process is organised. Disclose stakeholder inputs received and how they influence the plan, in line with the NRL requirement for an open and effective preparation process.
- 3.2. Strengthen stakeholder consultation.** Ensure that all relevant stakeholders are given **early and effective opportunities to participate**. Establish stakeholder working groups or forums on key ecosystems or themes, and publish their composition, selection criteria and roles to avoid perception of bias. Aim for balanced representation and proactively reach out to missing groups. Document and communicate the outcomes of stakeholder meeting, so stakeholders can see how their contributions are considered. Use neutral (external) facilitation and clear, outcome-driven protocols to keep discussions constructive.
- 3.3. Increase public awareness and support.** Launch **communication and education campaigns** on the NRL and the NRP process, explaining why restoring nature is necessary and beneficial for all economic sectors and citizens, what the plan will achieve, and how it will be implemented fairly. Use media, public workshops, and online platforms to share accessible information on planned measures, their benefits, interim findings, pilot projects and opportunities for public input.
- 3.4. Foster cross-border and regional transparency.** For Member States sharing ecosystems or borders, exchange information on NRP development with neighbouring countries or regional bodies, especially for transboundary ecosystems that require coordinated restoration.

Recommendations to the European Commission

1. Ensure transparent and accountable NRP development

- 1.1. Establish regular EU-level progress monitoring.** Regularly assess Member States' progress in preparing their NRPs and publish results. This should cover **process indicators** (e.g. stages of NRP development, stakeholder consultation steps taken), **content indicators** (e.g. inclusion of all targets and robust scientific data), and **transparency measures** (e.g. whether early drafts are published, open calls for evidence held, and summaries of stakeholder inputs provided).
- 1.2. Facilitate comparability and accountability.** By standardising key information (such as how targets, reference values, and measures are reported), the Commission can more easily identify gaps or shortfalls. The Commission should make clear that it will flag non-transparent or incomplete NRPs during its assessment, reinforcing accountability.

2. Strengthen coordination, capacity and funding support for Member States

- 2.1. Provide enhanced technical guidance and offer tailored capacity-building support** to help all Member States develop science-based, ambitious, and inclusive NRPs, with particular support for those with limited administrative or technical capacity.
- 2.2. Deploy targeted technical assistance** (e.g. through the Technical Support Instrument or dedicated expert teams) to cover short-term gaps in NRP preparation and early implementation, such as ecosystem assessments or economic analyses, so all countries can meet the 2026 draft NRP deadline without compromising quality.
- 2.3. Enable structured peer learning and collaboration.** The Commission can convene regular forums for exchange of good practices, lessons learned, and methodologies (e.g. how frontrunners are defining targets or securing stakeholder buy-in). Facilitating direct cooperation (including twinning between advanced and early-stage countries) will elevate the overall level of NRP development across the EU.
- 2.4. Support Member States in securing adequate funding for restoration and** using all relevant funding opportunities in the current MFF¹⁴ and continue to directly fund LIFE projects in the next EU budget.¹⁵

3. Ensure coherent, science-based foundations for NRPs

- 3.1. Develop detailed methodological guidance** to harmonise the scientific approaches used in NRPs. This should ensure that key concepts and data, such as ecosystem definitions, habitat typologies, baseline/reference conditions, and restoration targets, are interpreted consistently across the EU and align with both the NRL's legal requirements and the latest scientific evidence. The guidance can draw on input from expert groups and research institutions, and should be updated as new knowledge emerges
- 3.2. Promote best-available science and address knowledge gaps.** Clearly communicate that NRPs must utilise the most up-to-date and comprehensive scientific evidence. Encourage Member States to involve national scientific bodies and independent experts early in the process and to be transparent about how scientific input is used.

¹⁴ WWF Briefing paper on Climate and Nature Funding under National Plans, September 2025. Brussels. Available at: <https://www.wwf.eu/?19327266/An-EU-budget-that-delivers-on-climate-and-nature-Getting-National-and-Regional-Partnership-Plans-right>

¹⁵ NGO Briefing Paper on LIFE in the next Multiannual Financial Framework (MFF), Brussels, September 2025. Available at: <https://www.wwf.eu/?19380941/The-future-of-LIFE-in-the-next-EU-budget>

4. Reinforce EU monitoring and NRP enforcement mechanisms

- 4.1. Develop a robust EU-level monitoring and reporting framework** to track NRP progress and outcomes. Define clear indicators and milestones for both the implementation process and ecological results. Indicators may include the percentage of NRP actions initiated by 2027, hectares of ecosystems under restoration, or improvements in species status by 2030. Member States should report periodically on these indicators, allowing the Commission to compile comparable progress reports EU-wide.
- 4.2. Make full use of existing enforcement mechanisms and corrective actions.** When reviewing draft NRPs, clearly flag gaps (e.g. insufficient ambition, unjustified derogations, missing data or missed deadlines) and, where necessary, follow up with observations, and as a measure of last resort, initiate infringement proceedings in accordance with the Treaty on the Functioning of the European Union Articles 258 – 260.¹⁶

5. Facilitate effective stakeholder engagement and public participation

- 5.1. Publish practical guidance on stakeholder consultation modalities**, including early announcement of consultation timelines, clear explanations of how inputs will be used, balanced representation of interests, and a transparent distinction between scientific advisory processes and interest-based stakeholder forums.
- 5.2. Differentiate expert input from general input.** In communications and guidance, stress the importance of separating scientific expert participation from general stakeholder consultation. Recommend that Member States run dedicated scientific advisory processes or committees (to **draw on** scientific expertise) alongside public consultations (to **incorporate** values, interests and local knowledge) and clearly indicate in their NRP how (and what type of) evidence informed decisions.
- 5.3. Coordinate communication on restoration benefits.** Lead or co-fund EU-wide and national communication efforts that highlight the tangible benefits of nature restoration, showcase inspiring flagship projects, and explain the NRP process, helping Member States build broad public and political support.

6. Promote coherence across EU policies

- 6.1. Promote integration of nature restoration into smart application of the EU sectoral policies.** Ensure that key EU policies and initiatives are implemented in ways that support rather than undermine NRL's objectives.
- 6.2. Support alignment of plans at the Member State level.** Encourage and assist Member States to harmonise their NRPs with other national strategies and plans, using existing tools such as the Commission's country-specific semester or Environmental Implementation Review.
- 6.3. Facilitate cooperation on shared ecosystems.** Promote joint approaches for transboundary ecosystems through coordination between neighbouring Member States, existing river basin and regional sea structures, and targeted use of cross-border funding instruments (e.g. INTERREG)

¹⁶ Article 17(4) NRL



#RESTORENATURE