



# WWF EUROPEAN POLICY OFFICE

ANNUAL REVIEW 2022



2022

# A HISTORIC YEAR FOR PEOPLE AND NATURE

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**2022** was another year of worrying broken records: Wildlife populations - mammals, birds, amphibians, reptiles and fish - have seen a devastating 69% drop on average since 1970, according to WWF's Living Planet Report published in October. Europe's summer of 2022 was the hottest on record and, overall, last year was the second warmest year in Europe. After a global pandemic, a war broke out in Europe, with a toll of unbearable human suffering and destruction, which is still continuing.



ESTER ASIN  
DIRECTOR  
WWF EUROPEAN POLICY OFFICE

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By adopting the European Green Deal in 2019, the EU committed to leading the transition towards a climate neutral economy and society, putting nature protection higher in the political agenda and shifting food production. In 2022, we witnessed attempts by vested interests, some industries and certain politicians to use the war in Ukraine as a justification for watering down crucial environmental standards in Europe, to backtrack on global commitments and to postpone or even scrap policy initiatives.

Yet, progress was possible in these challenging times: we welcomed the Commission's proposal for a nature restoration law published in June after several delays. This initiative is a message of hope and a hugely transformational agenda. There is a growing understanding of the key role that nature can (and must) play in overcoming many societal challenges. Nature restoration means better human health (both physical and mental), economic opportunities, better protection against extreme weather impacts of climate change and rebuilding carbon sinks. And above all, a healthier future for nature and people.

With the publication of the European Commission's RePowerEU plan in May, there is also now a recognition of the even greater urgency of tackling our reliance on fossil fuels, to implement deeper energy saving measures, and to accelerate the deployment of renewable energy sources. Co-legislators managed to seal a deal on some of the key EU climate policies under the Fit for 55 package including the EU Emissions Trading System. However, for WWF, the outcome falls far short of what is needed in view of the Paris Agreement's 1.5C objective.

The year was also a powerful reminder that we are not alone on this journey, with vivid examples of what *"together possible"* means in action: creating amazing opportunities for being more impactful. One such instance was our advocacy work to oppose the inclusion of gas and nuclear in the EU taxonomy. Even if in the end, the European Parliament voted to label gas and nuclear power as green activities in July, we manage to create a movement beyond WWF and the environment NGOs in support of a science-based taxonomy, and a public debate on how to finance the transition.

#Together4Forests was another shining example of what we can achieve as a network when we all pull in the same direction, inspire others to join the movement and lead in an inclusive way. The campaign really showed WWF at its very best, combining more traditional advocacy with cutting edge campaigns and mobilisation, leading to a landmark EU law against deforestation approved by the three EU institutions in December.

I would like to warmly thank the many colleagues in the WWF global and European network who have closely worked with us and mobilised their teams, partners and governments throughout the year. Our donors for their trust. Our partners in the wider civil society, including other NGOs, scientists and businesses. And all the citizens who have taken action in support of our EU policy calls, especially on deforestation and nature restoration.

I would like to end with a special thought for Tony Long, one of the founders of the WWF European Policy Office and its Director for almost 30 years. Tony sadly passed away in February 2022. Together with many pandas, he made WWF one of the most impactful NGOs in Brussels and shaped EU environmental policy for decades. It is an honor to follow his legacy and to lead a team which works with integrity, courage, persistence and resilience every day.

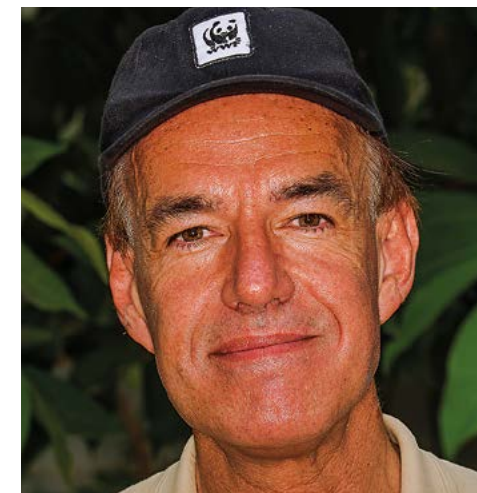
Last year concluded with a number of significant wins for nature. On the international stage, after four years of intense advocacy, mobilisation and engagement by WWF and many other organisations, the 188 countries attending the UN Biodiversity Conference (COP15) adopted an ambitious new Global Biodiversity Framework: on 19 December 2022 they formally committed the world to halting and reversing biodiversity loss by 2030. We now have a global and measurable goal for nature, equivalent to 1.5C for climate as set under the Paris agreement. Against the backdrop of a global pandemic, the war in Ukraine, soaring energy prices and the global economy under stress, reaching an agreement was challenging, and it makes this historic moment for nature even more significant.

With this deal, governments chose the right side of history, and listened to the voice of the voiceless: the millions of species making up Earth's amazing diversity of life with which we share the planet; the most vulnerable and marginalised communities on the frontline of climate change and environmental degradation; the indigenous peoples whose lives and cultures depend directly on healthy ecosystems. And all the eight billion of us whose future depends on healthy nature.

The EU played a significant role in achieving the Kunming-Montreal Agreement, and it now needs to continue to lead by example by translating it into reality. This includes ambitious EU legislation as well as mobilisation and redirection of finances for biodiversity. A nature-positive Europe can be achieved through reaching the

**"NATURE CAN  
BOUNCE BACK IF  
GIVEN A CHANCE  
- NOW WE HAVE  
TO MAKE IT  
HAPPEN"**

© Ola Jernsten / WWF-Sweden



MARCO LAMBERTINI  
FORMER DIRECTOR GENERAL  
WWF INTERNATIONAL

30% protection target and a strong Nature Restoration Law, setting a global precedent on what concrete implementation of the global deal (and notably its 30% restoration target) should look like in practice. We know that nature can bounce back if given a chance - now we have to make it happen. But it will also require the implementation of other components of the EU Green Deal, in particular driving a just transition of key sectors like agriculture towards sustainable production and consumption.

As this Annual Review demonstrates once again, the role of WWF's European Policy Office in Brussels continues to be critical in driving some of the world's most ambitious environmental legislation. In 2022, we celebrated some important successes. In particular, I want to highlight the #Together4Forests campaign, led by WWF EU and supported by more than 30 WWF offices across not only Europe but also Latin America. The result - an ambitious EU law to ban products linked to deforestation from the EU market - which was finally agreed in December, will have a significant impact on the world's forests and also set a high standard for other regions to follow. For me, #Together4Forests is a powerful example of what we can achieve when we join forces and work together on a common goal!

There is still much work ahead, and many challenges remain, and we are counting on the EU to continue setting global standards. WWF EU and the entire WWF network stands ready to drive strong action for nature and the climate, and to support the implementation of these important laws and agreements. Because there is only one way to deliver a truly equitable, people-positive future, and that is a nature-positive one.



# 2022 HIGHLIGHTS

## JANUARY

A new WWF report provides an eye-opening insight into the **impact of EU consumption on nine ecological regions**.

WWF joins the European Citizens Initiative to **ban fossil fuel advertisements** in the EU.

Feeding into preparations for an EU Nature Restoration Law, WWF highlights the importance of **restoring our ocean** for effective climate and biodiversity action.

WWF lays out ten ways in which the European Commission is **greenwashing gas and nuclear** in the EU Taxonomy.

## FEBRUARY

According to a WWF/ IEEP study, **restoring degraded terrestrial EU habitats** could remove huge amounts of greenhouse gas emissions each year.

WWF and 23 other NGOs call on the EU to ensure the revised **EU Fisheries Control Regulation** contributes to sustainable fisheries management.

Together with Greenpeace, WWF organises **protests in 14 European countries** highlighting the alarming rate at which the world is losing its forests.

The European Commission publishes its final proposal that classifies gas-fired power and nuclear power as environmentally sustainable under the **EU Taxonomy** - the EU's "green" investment guidebook. At the **6<sup>th</sup> EU-African Union Summit** in Brussels, WWF advocates - without success - for concrete commitments to support ambitious and just climate and biodiversity actions in Africa.

The European Commission publishes its much-awaited **Sustainable Corporate Due Diligence** legislative proposal, designed to hold businesses accountable for harming human rights and the environment.

## MARCH

WWF assesses **how sustainably Member States manage their seas**, revealing that Baltic national plans lack cross-border harmony, and have inadequate measures to restore and protect ecosystems.

More than **53,000 citizens send letters** to their environment ministers urging them to stand for a strong EU deforestation law in upcoming negotiations.

New research commissioned by WWF reveals that the **average European consumes 60.6 kg of soy per year**, most of which can be linked to deforested areas and converted savannahs.

WWF inaugurates the **"Together for Forests" mural in Brussels**, raising awareness of the destructive impact of European consumption on nature.

In its position on the proposed **Environmental Crime Directive**, WWF calls for a future law that is strong and ambitious enough to effectively step up the fight against environmental crimes, including wildlife crime.

In just one weekend, 14,000 EU citizens, 166 environmental NGOs, and a group of environmental ministers send letters to the European Commission protesting against the delay of the draft **EU Nature Restoration Law**.

## APRIL

30 environmental NGOs send a letter to the European Parliament to take action on the alarming situation in **Doñana National Park** in Spain.

WWF publishes a 'To-Do List' for the European Commission and Member States to implement the commitments agreed under the **8<sup>th</sup> Environment Action Programme**. May

## MAY

**Scientists from across the EU** respond to the internet's most searched questions by citizens about deforestation.

The European Commission launches its **RePowerEU** plan to lower the EU's dependence on Russian gas; in response, WWF issues recommendations on boosting resilience through the European Green Deal.

In its **"Europe eats the world"** report, WWF challenges the notion that the EU's agri-food systems feed the world and that increased sustainability would sacrifice food security.



## JUNE

In a dramatic plenary session on elements of the **Fit for 55 climate package**, the European Parliament votes to reject its own report on the emissions trading system, showing the deep divisions between political groups.

Environment ministers of **EU Member States vote to weaken the EU deforestation law**, ending up with a position with more holes than a Swiss cheese.

A survey mandated by WWF shows that only 29% of citizens think that the EU should classify nuclear power as 'green' in the **EU Taxonomy**.

After long negotiations, EU Environment Ministers **water down the European Commission's Fit for 55** climate proposals, which were already insufficient to keep global temperature rise below 1.5°C.

With an overwhelming majority, MEPs in the Environment and Economic Affairs committees **reject the greenwashing of gas and nuclear power** in the EU Taxonomy.

WWF releases **video testimonials from the Amazon and the Cerrado**, giving a voice to indigenous peoples and local communities affected by nature destruction.

In its draft **EU Nature Restoration Law**, the European Commission proposes legally binding restoration targets for various ecosystems, following years of WWF advocating for an ambitious, timely and enforceable law.



© Wild Wonders of Europe / Eleni Harberg / WWF



# 2022 HIGHLIGHTS

## JULY

MEPs vote to keep **gas-fired power and nuclear power in the EU Taxonomy**, defying science and the public outcry of half a million citizens; WWF and other NGOs threaten legal action.

MEPs in the European Parliament's Environment Committee support a more **ambitious EU Deforestation law** by addressing some important loopholes.

## AUGUST

WWF publishes guidance for how **offshore renewable energy projects** should move towards a broader framework that prioritises environmental and social criteria rather than merely cost.

## SEPTEMBER

After **206,000 citizens send personalised messages and memes** to their MEPs asking them to raise the bar to protect forests, the European Parliament votes for a strong EU deforestation law.

WWF, ClientEarth, Transport & Environment, and BUND are starting **legal action to prevent gas-fired power** from featuring in the EU's sustainable finance Taxonomy.

Five NGOs including WWF **leave the EU Platform on Sustainable Finance** over lack of independence.

A paper co-signed by WWF calls for **stronger river connectivity targets** in the EU nature restoration law.

WWF and BCG release a report highlighting the benefits that a **sustainable and nature-friendly reconstruction** would bring to **Ukraine** after the war.

In its vision paper for a new EU legislative framework for **sustainable food systems**, WWF identifies key shortcomings in the way we produce and consume food in the EU and steps to address them.

World Rivers Day sees the launch of a communication action to push for **ambitious freshwater targets in the nature restoration law** with a fun and unusual campaign on migratory fish.

**WWF experts visiting Doñana**, one of the most important wetlands in Europe, raise the alarm bell over the dire state of this ecosystem.

## OCTOBER

The European Parliament adopts a resolution on **strengthening ocean governance and biodiversity**, cementing nature as the foundation of offshore renewable energy growth.

WWF assesses **EU maritime plans**, showing that North Sea and North-East Atlantic Member States have failed to adequately address climate change uncertainties, nor integrate nature protection and restoration.

In a public statement, more than **140 NGOs of the ever-growing #Together4Forests movement** urge decision makers to give teeth to the EU deforestation law ahead of final negotiations.

WWF commissions a **survey on food habits** in 12 EU countries, which shows that three in four European consumers believe that EU governments should lower the prices of sustainable food.

The European Parliament's Environment Committee votes on changes to the Renewable Energy Directive (part of **RePowerEU**), failing to oppose the weakening of environmental rules.

Wildlife populations have seen a **devastating 69% drop on average** since 1970, according to WWF's latest Living Planet Report 2022.

EU Member States agree on a **strong position to show climate leadership** ahead of the COP27 climate negotiations.

Ahead of the UN Biodiversity Conference (COP15), EU Environment Ministers commit to **halting and reversing biodiversity loss** for achieving a nature-positive world by 2030.



## NOVEMBER

**Climate COP27 in Sharm El-Sheikh** sees a strong WWF presence; the creation of a Loss & Damage fund is the silver lining to an otherwise disappointing outcome.

Wholesalers, retailers and food distribution companies from across the EU declare their support for **full digital traceability of seafood** entering the EU at a webinar organised by WWF and other NGOs.

The European Parliament votes a resolution **undermining the protection of Europe's large carnivores** such as wolves, bears and lynxes.

Research co-led by WWF reveals inconsistencies in how Member States implement mandatory border controls to block products sourced from **illegal, unreported and unregulated (IUU) fishing** from entering the EU.

WWF launches its report 'Where did all the Money go?' on the **Emissions Trading System** and how Member States use the revenues they get from it.

The European Commission publishes its **new EU Action Plan against Wildlife Trafficking**, which includes most of WWF's recommendations.

**CITES COP19** agrees on groundbreaking protection for sharks and tree species.

## DECEMBER

In their position on the **Environmental Crime Directive**, Member States fail to demonstrate any resolve to effectively step up the fight against environmental crimes.

EU decision makers reach an agreement on the most complicated files of the **Fit for 55 climate package** - a step in the right direction, but still too little, too late.

In their positions on the **RePowerEU files**, the European Parliament and Member States vote to weaken environmental rules for the deployment of renewables.

EU decision makers reach a **historic political agreement for a world-first law against deforestation**, a massive success for the WWF-led #Together4Forests campaign.

The **global biodiversity deal** adopted under the UN Convention on Biological Diversity (CBD) represents a major milestone for biodiversity, and now needs swift implementation and funding.

A majority of EU environment ministers voices their support for an **ambitious EU Nature Restoration Law** that can be a game-changer for nature, people, the climate and the economy.





2022 SAW THE CULMINATION OF  
MORE THAN TWO YEARS OF INTENSE  
CAMPAIGNING WITH A HISTORIC  
AGREEMENT TO STOP EU-DRIVEN  
DEFORESTATION

# #TOGETHER4FORESTS

Led by WWF, the #Together4Forests movement continued to grow, with 220 NGOs actively backing the campaign through public outreach and advocacy.

- Activists from the #Together4Forests movement held protests in 14 European countries highlighting the alarming rate at which the world is losing its forests.
- More than 200,000 citizens sent letters, personalised messages, memes and drawings to their environment ministers and MEPs urging them to support strong legislation to tackle deforestation.
- WWF inaugurated the “Together for Forests” mural, bringing iconic wildlife closer to the European quarter in Brussels, and raising awareness of the destructive impact that European consumption has on nature.
- In December, EU decision makers reached a historic political agreement for a world-first law against deforestation.

“The recent deal on an EU deforestation law shows the incredible power of civil society. More than 1.2 million citizens, 220 NGOs, scientists, and progressive companies that actively supported the **#Together4Forests** campaign have been listened to at last. Deforestation will no longer end up on EU supermarket shelves and dinner plates.”

LIESBETH VAN DEN BOSSCHE, EU CAMPAIGN MANAGER, WWF EUROPEAN POLICY OFFICE



# WE MADE IT: EU DEFORESTATION LAW IS NOW A REALITY!

Following an intense campaign led by WWF and supported by **more than 220 NGOs** around the world, the year ended with a historic agreement to stop products and commodities linked to deforestation from entering the EU market - a massive victory for the world's forests and our climate!

For years, deforestation has been creeping into our home. Our fridge. Our lunch. Our coffee and the paper cups it comes in. Agricultural expansion is behind almost 90 percent of global deforestation – a far greater impact than previously thought - driving the destruction of ecosystems that are crucial to our survival.

And the EU plays an important part in this. Second only to China, the EU is one of the **largest importers of products associated with tropical deforestation** and emissions through its consumption of commodities and products including soy, beef, palm oil and cocoa. Without knowing it, EU consumers are also contributing to the conversion of other natural ecosystems beyond forests, including the Brazilian Cerrado, considered the most biodiverse savannah on the planet.

The WWF-led #Together4Forests campaign set out to change this by advocating for a strong EU to address the EU's footprint on nature. At the end 2021, the European Commission presented a **legislative proposal**, and while not perfect, this was a strong start. After that, the ball was in the court of the European Parliament and Council to raise the level of ambition - and for WWF and its allies to ramp up efforts even more to make this happen.

## MOBILISING TO INFLUENCE EU MEMBER STATES

The year kicked off with the publication of “**Beyond Forests: Reducing the EU's footprint on all natural ecosystems**”, which provides an eye-opening insight into the impact of EU consumption on nine ecological regions and the feasibility for companies to keep nature destruction out of their supply chains. Coordinated by WWF-France, this report has been instrumental in shedding light on the threats that non-forest ecosystems are facing.

In early February, WWF and Greenpeace organised simultaneous protests in **emblematic natural areas and parks across 14 EU countries**, kicking off the first campaign push of 2022. WWF also launched an email action targeting ministers. Dozens of NGOs from the #Together4Forests movement actively participated in this action, mobilising more than **53,000 citizens in just over six weeks!**

In parallel, WWF commissioned **research on the EU's consumption of soy** and its impact on nature. The findings revealed that **Europeans consume 60.6 kg of soy per year** on average - mostly indirectly through animal

Activists across 14 European countries held simultaneous protests highlighting the alarming rate at which the world is losing forests.



feed - much of which is associated with deforested areas and converted savannahs in South America. These new findings helped us counter the attempts of some decision makers to exclude soy from the commodity scope of the law and to cover forests only.

Despite strong public support and advocacy efforts, environment ministers of EU Member States voted to weaken the Commission's proposal, ending up with a **position with more holes than a Swiss cheese**. But this only gave the campaign extra motivation to step up their advocacy work over the following months!

## PUTTING MEPS IN THE SPOTLIGHT

As MEPs prepared for discussions over the EU deforestation law, WWF inaugurated the “**Together for Forests**” mural just a few minutes away from the European Parliament. Unveiled in March, this mural raises awareness of the destructive impact European consumption has on nature, thereby shining a light on why we need ambitious legislation.

We also teamed up with key scientists across the EU. We selected the internet's most searched questions by citizens on

deforestation and experts from seven countries - Belgium, Hungary, Italy, Poland, Portugal, Romania and Sweden - answered them. The resulting **short video** series further corroborated the need for strong legislation.

In June, we released insightful videos featuring testimonials from the Amazon and the Cerrado, where Indigenous peoples and local communities affected by nature destruction talked about **hidden soy, hidden violence and hidden pollution**.

In June, the #Together4Forests movement launched its second public engagement action of the year, this time targeting the European Parliament. More than 200,000 citizens participated in this action by sending personalised messages and memes to their decision makers that were **handed over to leading MEPs at a public event** in front of the “Together for Forests” mural.

Young citizens also played a major role in this event, as they handed over a **booklet gathering drawings of scores of children from across Europe**. Featuring devastating fires but also children's hopes for a brighter future, the drawings conveyed a powerful message and were a clear proof that citizens from all ages want strong legislation in place.



Created by the acclaimed urban artist and climate activist, Carlos Alberto GH, the #Together4Forests mural brings iconic wildlife closer to the European quarter in Brussels. In fact, it can be brought to life with an app!



MEPs Nicolae Ștefănuță, Delara Burkhardt and Christophe Hansen at the #Together4Forests handover event on 7 September 2022.

Thanks to these and other activities, the #Together4Forests movement ended the summer season with a big win: the **European Parliament voted for a strong EU deforestation law** by agreeing to additions which would make the law really powerful. Among these, MEPs proposed to protect “other wooded land” in addition to forests, which would mean that 80% of the Brazilian Cerrado would be protected. And to give their position more teeth, they also proposed that financial companies, including those backing the world’s worst deforesters, comply with the same rules.

## CAMPAIGNING UNTIL THE LAST MOMENT

The end of September saw the beginning of the so-called trilogues, where the European Commission, Council and Parliament sat together to agree on the final text for this law. This marked the final stretch of the campaign and preceded a myriad of inspiring and effective tactics to ensure EU negotiators would maintain a number of key elements.

Together with other NGOs, WWF coordinated a **public statement** urging decision makers to raise the level of ambition. Backed by more than 140 NGOs from around the world, this statement listed the key ingredients for effective legislation and helped the #Together4Forests movement counter the attempts of a strong industry lobby trying to water down the law.

And to make sure our message stood out, WWF, together with people’s mobiliser WeMove Europe, set up powerful ads in the EU quarter. For two weeks, bike and rail billboards and an evocative 40m² skyboard between the Council and the Commission buildings reminded EU negotiators that we were watching them very closely.

Following intensive weeks of campaigning, EU decision makers reached a historic political agreement on 6 December 2022. This regulation will be the first in the world to tackle global deforestation and will significantly reduce the EU’s footprint on nature. As of mid-2024, the EU will no longer allow products that are linked to the destruction of forests onto the EU market.

One of the most unique aspects of this law is that new rules will go beyond legality: in order to enter the EU market, products must not only be legal according to the producing country’s standards, but also free of deforestation and forest degradation.

Unfortunately, decision makers decided not to support the Parliament’s proposal to extend the scope immediately to other wooded land such as savannahs, even though many of these are already under immense pressure from agricultural conversion. As a compromise, the Commission will have to present an impact assessment on the feasibility of including other natural ecosystems one year after the entry into force of the law.

Another missed opportunity was the lack of clear recognition of human rights, particularly of indigenous peoples and local communities. The current text limits the scope of human rights to national laws: this means that if certain rights of

Indigenous peoples or local communities are not reflected in national legislation, they will not be protected under the EU deforestation law either. WWF will continue to advocate to ensure that human rights are strengthened in upcoming reviews.

This **outcome is a significant win for WWF’s #Together4Forests campaign**, which has brought together 220 NGOs to fight for a strong EU law against deforestation over the last two years.

EU Member States must now work with all relevant stakeholders to fast-track implementation and ensure that this landmark law works not just on paper, but also in practice. WWF will follow this process very closely and will

“We have made history with this world-first law against deforestation. As a major trading bloc, the EU will not only **change the rules of the game for consumption** within its borders, but will also create a big **incentive for other countries** fueling deforestation to change their policies.”

ANKE SCHULMEISTER-OLDENHOVE,  
SENIOR FOREST POLICY OFFICER AT WWF EUROPEAN POLICY OFFICE



2022: A HISTORIC YEAR FOR NATURE  
IN EUROPE AND BEYOND

# NATURAL RESOURCES

**WWF** led a number of high profile campaigns to push for nature-positive new legislation and strong implementation of existing laws. Some highlights include:

- Following a NGO campaign, the European Commission finally tabled its draft EU Nature Restoration Law - a potential game-changer for nature, people, the climate and the EU economy.
- WWF's report "Europe eats the world" challenged the notion that the EU's agri-food systems feed the world and that increased sustainability would sacrifice food security.
- On World Rivers Day WWF launched an action to push for ambitious freshwater targets in the nature restoration law with a fun and unusual campaign on migratory fish.
- The European Commission's revision of the EU Action Plan against Wildlife Trafficking included most of WWF's recommendations.
- WWF's Living Planet Report published in October 2022 warned that the world had lost 69% of its wildlife populations since 1970.
- The Kunming-Montreal deal signed in December under the UN Convention on Biological Diversity commits the world to stop and reverse biodiversity loss by 2030.



**“The European Green Deal is an important policy tool to address crises. In 2022, we focused on ensuring that nature and land-use related legislations and initiatives were ambitious enough to meet the expectations of a real European Green Deal.”**

ANDREAS BAUMÜLLER, HEAD OF NATURAL RESOURCES, WWF EUROPEAN POLICY OFFICE



# BIODIVERSITY

Last year, we witnessed unprecedented pledges to restore nature. The European Commission published its long-awaited proposal for a EU Nature Restoration Law, and 196 countries signed a global biodiversity framework at COP15 in Montreal, hailed as a “Paris Agreement for Nature”, aiming to halt and reverse biodiversity loss by 2030.

## OFF TO A FALSE START

At the beginning of 2022, we believed that the publication of the EU Nature Restoration Law proposal was just around the corner. In February, our study ‘**Nature Restoration – the Missing Piece in the EU Climate Action Puzzle**’ revealed the great climate action potential of restoring degraded terrestrial habitats across the EU as they could take up as much CO<sub>2</sub> equivalent out of the atmosphere each year as the combined annual greenhouse gas (GHG) emissions of Belgium, the Netherlands and Luxembourg.

However, in March the European Commission **postponed the publication of the legislative proposal**, despite last-minute pleas from over 14,000 EU citizens, 166 environmental NGOs, and a group of environmental ministers to table the law as announced.

In response to the delay, WWF launched the #Move4Nature action in which we encouraged citizens to get moving in nature to show their support for an ambitious and timely EU Nature Restoration Law. Together, we walked, ran, cycled and swam in nature, and overall added over 42,000 kilometres to our #Move4Nature counter

- one time around the Earth! We delivered this result to the European Commission with a clear message: we need an ambitious EU law to restore nature, and we need it quickly!

## HUGE OPPORTUNITY TO BRING NATURE BACK

A few days later, on 22 June, the EU Nature Restoration Law proposal was finally published, making it the first major piece of EU biodiversity legislation since the Habitats Directive in 1992.

The proposal introduces legally binding restoration targets for various ecosystems across the EU and can be a game-changer for nature, people, the climate and the economy. This long-anticipated law is a once-in-a-lifetime opportunity to put Europe’s degraded nature on a path to recovery and tackle the interlinked biodiversity and climate crises. The proposal’s publication marks years of WWF advocating for an ambitious, timely and enforceable EU law to restore nature.

WWF, along with other environmental NGOs, **welcomed the proposal**, which is centered

around a legally binding target of restoring at least 20% of the EU’s land and at least 20% of the EU sea areas by 2030 - a firm attempt at reversing devastating biodiversity loss and tackling the climate crisis. Restoring forests and peatlands, freshwater, marine and urban ecosystems, and agricultural land can help reduce emissions and sequester millions of tonnes of carbon each year.

The **joint NGOs analysis** of the proposal, published in August, points out that it is crucial that Member States endorse its overarching target and that the ambition level should not be lowered.

WWF will continue strong advocacy towards the Council and European Parliament to bolster the legal proposal on some key elements, while encouraging citizens and civil society to keep voicing their support for urgent restorative action in the EU

## WWF LIVING PLANET REPORT 2022

In October, another wake-up call came with the publication of **WWF’s Living Planet Report 2022** - the world has witnessed a devastating 69% drop on average in wildlife populations since 1970. The findings highlighted the pressing

need to halt the continuing downward trend, also in Europe, and emphasised that solutions are available to address the advancing biodiversity loss. November was marked by the European Parliament’s **disappointing vote** for a resolution undermining the protection of Europe’s large carnivores, following a years-long series of attempts to decrease their legal protection status, particularly wolves.

## ENDING THE YEAR ON A HIGH NOTE

In December, two years later than planned, world leaders met at COP15 in Montreal to negotiate a post-2020 global biodiversity deal. The Kunming-Montreal Agreement, adopted on 19 December by 196 countries under the UN Convention on Biological Diversity, commits the world to **stop and reverse biodiversity loss by 2030**. A day after this landmark deal was reached, EU environment ministers met in Brussels, some on their way back from Montreal, to exchange views on the EU Nature Restoration Law proposal for the first time. **Voicing support for the law** by the majority of Member States was a pleasant wrap-up of a hopefully breakthrough year for nature in Europe and worldwide.

**TOGETHER, UNDER #MOVE4NATURE, CITIZENS WALKED, RAN, CYCLED AND SWAM**

**42,000 km**  
**IN SUPPORT OF A STRONG RESTORATION LAW**



NGOs deliver the messages of citizens participating in the #Move4Nature campaign to EU decision makers in Brussels.



# AGRICULTURE & FOOD

Our food and agriculture system is one of the key drivers for biodiversity loss, and responsible for 34% of global CO<sub>2</sub> emissions. WWF has long been advocating for systemic change to tackle this issue.

## SHORT-TERM MEASURES WON'T CUT IT

The war in Ukraine sent shockwaves through the global food system, leading to rising food prices and shortages of key agricultural inputs, and prompting vested interests to argue for the EU to weaken its environmental standards and increase food production. For WWF, such calls are misguided and counterproductive. The EU Farm to Fork Strategy remains our only pathway to an EU food system that is able to withstand the consequences of the climate and biodiversity crises over the coming years and decades.

In March, the European Commission adopted a package of measures to address short-term concerns in relation to agri-food markets while maintaining the longer-term plans to make the EU food system sustainable. This included allowing the cultivation of farmland that is normally left to fallow for agronomic and environmental reasons.

WWF has argued that the measures agreed by the Commission address the short-term impacts on agri-food markets but will not shift us away from the EU's dependence on imports of fossil fuels, feed and fertilisers. Instead, this can only be achieved with a longer-term transition to a more resilient and sustainable food system, as promised under the EU Farm to Fork Strategy. This should include the production of food using fewer agrochemicals, reducing the enormous share of crops that are used to feed livestock, and using agriculture subsidies appropriately to support farmers in this transition. Only then can genuine long-term food security be guaranteed.

## EUROPE FEEDS THE WORLD? NO IT DOESN'T

As an evidence-based contribution to this debate, in May, WWF published a report entitled **"Europe eats the world"**, which challenged the notion that the EU's agri-food systems feed the world and that increased sustainability would sacrifice food security. The report shows that, despite being the world's largest exporter of agri-food products in

economic terms, the EU carries a significant trade deficit when measured by what actually matters in nutritional terms, such as calories and proteins. Far from 'feeding the world', the EU consumes more than its fair share and our current high levels of food production are only possible thanks to massive imports of resources. This timely report made headlines across Europe, resulting in more than 300 media mentions.

Against the backdrop of soaring food prices, in the summer of 2022, WWF commissioned a **survey on food habits in 12 EU countries** to assess citizens' perceptions on food and on the actions that key stakeholders could undertake to make food systems more sustainable. The results show that three in four European consumers believe that EU governments should lower the prices of environmentally friendly and healthy food.

## NEXT UP: SUSTAINABLE FOOD SYSTEM LAW

The way we produce and consume food is not only unsustainable, but also detrimental to our health, with unhealthy diets accounting for 1 in 5 deaths in Europe. To address this, the European Commission is set to present its proposal for an EU Sustainable Food System Law in 2023. This is a unique opportunity to transition to more sustainable food practices and healthier consumption patterns.

To ensure we reach this goal, WWF presented its vision paper **'Valuing food: for a game-changing EU legislative framework for sustainable food systems'** in September. This paper identifies the key elements to address the shortcomings of European food systems and lists some concrete steps to ensure their transformation.

In 2023, WWF will ramp up its advocacy efforts to ensure the Commission's proposal for the new law is as ambitious as possible to make a real difference to the way in which we produce and consume food in Europe.

Food is our source of life and how we produce and consume it has a tremendous impact on the climate and biodiversity.



# FRESHWATER

## RIVERS IN THE EU NATURE RESTORATION LAW

The European Commission’s proposal for a Nature Restoration Law (see p. 18) includes an obligation for Member States to identify and remove barriers in order to restore at least 25,000 kilometres of free-flowing rivers by 2030 - a huge opportunity to speed up dam removal and river and floodplain restoration across Europe.

In September, **WWF and other NGOs released a paper to call for stronger river connectivity targets** in the EU nature restoration law. According to WWF, Member States should be required to restore 15% of river length (178,000 km) into free-flowing rivers by 2030 through barrier removal and the restoration of the related floodplains.

WWF also organised a policy discussion at the European Parliament to advocate for strong river restoration targets, including the premiere of **short advocacy documentary** “Removing Dams - Restoring Rivers”, by WWF and the World Fish Migration Foundation.

World Rivers Day saw the launch of a new communication action to push for ambitious freshwater targets in the nature restoration law with a fun and unusual campaign on migratory fish, including a **very successful video**.

## TRANSFORMING HYDROPOWER IN EUROPE

Hydropower is destroying Europe’s last free-flowing rivers and accelerating the loss of our migratory fish species, such as salmon or eel. Building new hydropower plants runs contrary to the objective of the EU Biodiversity Strategy to restore free-flowing rivers.

WWF is advocating against any new hydropower development in Europe, and to exclude the eligibility of small hydropower plants from state support as they generate little electricity but deeply harm rivers.



People on dam wall of large reservoir in Alps.

In May, the European Parliament’s Environment Committee voted to introduce sustainability criteria for hydropower in the EU’s revised Renewable Energy Directive, by excluding small hydropower (i.e. plants with less than 10 megawatts/ MW) from counting towards the EU’s renewable energy target. Unfortunately, in plenary, **MEPs succumbed to pressure from Conservative groups** to weaken the criteria.

In June, a new WWF study found that **Sweden is systematically applying exemptions to EU water protection rules** under the Water Framework Directive (WFD) to avoid implementing environmental measures at hydropower plants, thereby seriously jeopardising the health of the country’s freshwater ecosystems.

In October, WWF and partner NGOs released a **joint briefing paper on RePowerEU** and hydropower, asking the European Parliament and Member States to exclude new or revamped hydropower projects from the proposed ‘go-to areas’, and for streamlined permitting under the amended Renewable Energy Directive. Unfortunately, this ask was **not headed in the European Parliament’s Environment committee vote** (see p. 28).

WWF will continue working on this topic during the final trilogue negotiations for the adoption of the revised Renewable Energy Directive in 2023.

## DOÑANA UNDER THREAT

Water theft is a big threat to one of Europe’s most iconic natural reserves, Doñana, and the relentless extraction of water for intensive and industrial agriculture - including with over 1,000 illegal wells - and domestic supply is drying out the wetland and endangering Doñana’s biodiversity. In letters addressed to EU policy makers, **WWF raised the alarm on the imminent threat to Doñana**, calling for Spain to better protect the park as required by the EU Water Framework Directive and the EU Habitats Directive and for the **European Commission** to refer the case back to the EU Court of Justice.





# WILDLIFE CRIME

Wildlife trade consists in the sale or exchange of wild animals and plants - either live or dead specimens, parts or derivatives, or transformed products.

Wildlife crime is a major environmental crime, and it encompasses any breach of national, regional, or international legislation that protects wildlife species. Hence, it includes illegal wildlife trade, but also illegal killing, poisoning, or poaching of wildlife. Examples of wildlife crime in Europe include exotic pet species illegally taken from their habitats, sturgeons poached for their caviar, birds of prey and large carnivores poisoned. Of course, wildlife crime harms the environment, but it also negatively affects security, governance, the economy, and ultimately human lives.

The EU is one of the biggest importers of wildlife species and wildlife-derived commodities in the world, some of which are illegally imported and traded within the Union. Some European species are also legally and illegally traded within and/or out of Europe, or are victims of other forms of wildlife crime. As the EU is a single trading bloc, wildlife trade - as all other trade - is governed by EU law.

## A NEW EU ACTION PLAN AGAINST WILDLIFE TRAFFICKING

Throughout 2022, WWF engaged in the European Commission's revision of the EU Action Plan against Wildlife Trafficking. In June 2022, a **joint position on this plan** was published together with TRAFFIC. In November, the Commission published its new Action Plan for 2022-2027, **which included most of WWF's recommendations**. Nevertheless, we criticised the lack of precision with regards to the allocation of human and financial resources at EU and national level, as well as the lack of dedicated action to support targets identified in the Post-2020 Global Biodiversity Framework (CBD). We are working with the WWF network to push for a strong implementation of the Action Plan at the EU and national levels.

## REVISION OF THE ENVIRONMENTAL CRIME DIRECTIVE

The European Commission had published its proposal on the new Environmental Crime Directive in December 2021, and this was discussed by the European Parliament and Member States throughout 2022. In March 2022, WWF published its **network position** on the text. We also developed recommendations together with an informal NGO coalition, calling for a future law that is strong and ambitious enough to effectively step up the fight against environmental crimes, including wildlife crime. In particular, the law must close existing gaps to cover all existing environmental offences and include dissuasive sanctions for natural and legal persons. WWF has also called for strong additional measures that would ensure better implementation of the law by Member States.

In December 2022, the Council reached its position **which weakens the Commission's proposal**, in particular with lower level of sanctions and lower ambition in terms of harmonisation. The ball is now in the court of the European Parliament, and WWF is engaging to ensure an ambitious position.

## CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)

At international level, **WWF also engages** with the EU and Member States in CITES processes and meetings to ensure that the positions they adopt benefit wildlife conservation. In 2022, two important meetings took place: the meeting of the Standing Committee in March and the Conference of the Parties (COP19) November, both of which were attended by WWF EU. The **COP19 meeting in Panama** closed with some very positive results.

THE EU IS ONE OF THE BIGGEST IMPORTERS OF WILDLIFE SPECIES AND WILDLIFE-DERIVED COMMODITIES IN THE WORLD, SOME OF WHICH ARE ILLEGALLY IMPORTED AND TRADED WITHIN THE UNION



CLIMATE ACTION FOR PEOPLE  
AND NATURE

# CLIMATE & ENERGY

**A**fter another year of broken weather records, wildfires and droughts, the impacts of climate change are becoming clearer every day, and the public continues to stand strong behind meaningful climate action. In 2022 we saw EU leaders and governments take a number of important decisions on the future direction of EU climate and energy policy:

- The war in Ukraine highlighted the EU's dependence on unreliable and expensive fossil fuels, and prompted urgent measures to accelerate energy efficiency and renewable energy under the REPowerEU initiative.
- Negotiations on the 'Fit for 55 package' of changes to EU climate and energy legislation, which was launched in 2021, reached their final stages.
- In contrast, negotiations at COP27 in Egypt ended without significant progress on higher climate targets - although with an agreement on a new fund for 'loss and damage'.

“2022 was a tumultuous year. With the climate emergency accelerating, and faced with the Ukraine crisis, the EU took significant steps to **cut its dependence on fossil fuels** and meet new emissions targets. But EU action still falls far short of what's needed to stop runaway climate change.”

ALEX MASON, HEAD OF CLIMATE AND ENERGY, WWF EUROPEAN POLICY OFFICE



# THE YEAR RENEWABLES BEAT FOSSIL FUELS

Amidst an unforeseen energy crisis, the European Union finalised most of a new set of climate laws - the **'Fit for 55 package'**, part of the European Green Deal - aimed at delivering a 55% cut in net emissions by 2030.

The war in Ukraine shed a bright light on the EU's dependence on fossil fuels, in particular Russian gas. In May the European Commission presented the 'REPowerEU' plan to try and tackle the issue.

The initiative includes some good proposals, such as higher targets for energy efficiency and renewables. But **WWF also identified harmful ideas**, such as changes to rules on permitting for renewable energy projects that could undermine nature protection legislation.

In its **position paper on RePowerEU** and in related advocacy WWF argued strongly that the rapid acceleration of wind and solar power and the restoration of nature had to be achieved in unison for a climate neutral and nature-positive Europe. Nevertheless, both the European Parliament and Council have gone along with the Commission's proposals **to weaken environmental rules on permitting**. WWF will continue to oppose this in 2023, instead advocating for the nature-friendly deployment of renewables during the ongoing RePowerEU negotiations.

WWF will also continue to argue strongly for higher targets for renewable energy. As part of its REPowerEU package the Commission proposed raising the renewable energy target for 2030 to 45%. While the Parliament endorsed this increase, Member States in the Council are dragging their feet, and so far have refused to move beyond the previously proposed target of 40%.

## MAKING THE EU FIT FOR 55 OR 1.5?

2022 saw the final stages of negotiations on most parts of the 'Fit for 55' package - the revision of the EU's climate and energy legislation to deliver a cut in net emissions of 55%



by 2030 (compared to 1990 levels). In line with our call for a higher target of at least 65% emissions reductions, WWF advocated for the strictest possible rules in the various legislative dossiers, focusing in particular on the Emissions Trading System (ETS), the introduction of the Carbon Border Adjustment mechanism (CBAM), the Social Climate Fund (SCF), the LULUCF Regulation and the Renewable Energy Directive (RED).

## MAKING POLLUTERS PAY

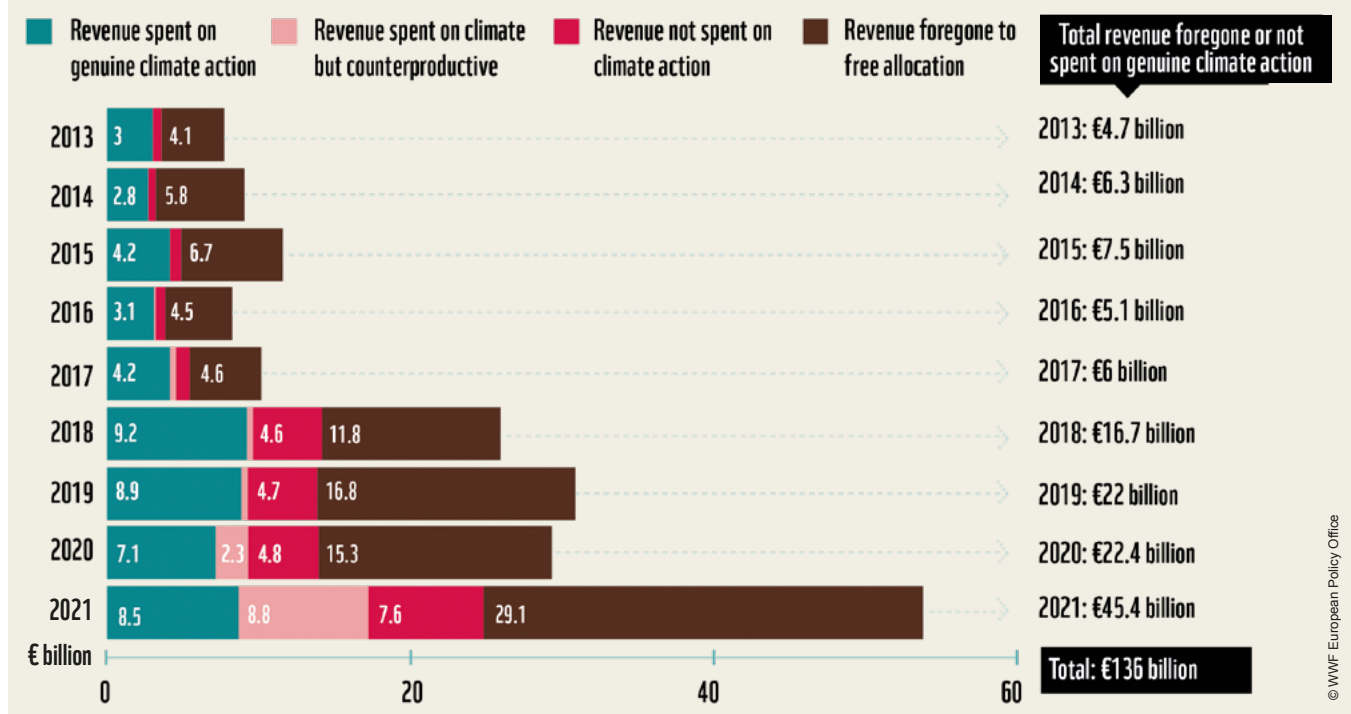
On the EU Emissions Trading System revision, WWF advocated strongly for a higher overall ETS target, and for the current system of free pollution allowances for heavy industry to be phased out, to make heavy polluters pay for their emissions, particularly in sectors that would be covered by the forthcoming 'Carbon Border Adjustment Mechanism' (CBAM). The CBAM is a carbon border tariff the EU intends to levy on incoming goods from countries with less stringent climate rules.

When it became clear that free ETS allowances would not be phased-out before 2030, WWF also called for the EU to impose strong conditionality requirements for industry to comply with in order to receive free ETS allowances.

This was supported by a detailed WWF analysis of the failures of the current system, notably in our **ETS revenues report** published in November. This report uncovered massive loopholes and showed that more than half of the emissions under the ETS during the last nine years were covered by free permits to pollute, amounting to nearly €100 billion in forgone revenues for Member States. The report also concludes that a whopping €126 billion of ETS revenues that could have been spent on green



Overview of ETS revenue and revenue forgone to free allocation (2013-2021)

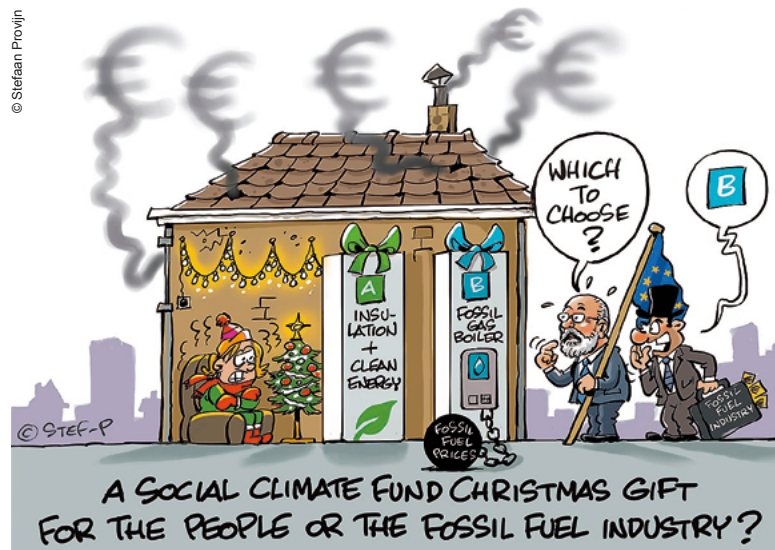


investments actually went elsewhere; this figure includes all free permits to pollute and revenues not spent on genuine climate action e.g. subsidies for fossil fuel-related projects. The report received international media attention in almost all European languages.

Negotiations on the ETS came to an end when a common agreement between the European Parliament, Council and Commission was reached just before Christmas. While the concerted efforts by WWF and others may have prevented a worse

result, the overall outcome was disappointing. For example, despite CBAM being introduced as early as 2026, European co-legislators still decided to keep handing out a large amount of free ETS allowances to heavy industry until 2034. WWF therefore **reacted negatively to the outcome of the ETS, SCF and CBAM trilogues**, pointing out that it was all too little, too late.





SCIENCE HAS SHOWN THAT BURNING TREES CAN INCREASE EMISSIONS FOR DECADES OR EVEN CENTURIES IN COMPARISON TO FOSSIL FUELS

## PUTTING PEOPLE CENTRE STAGE

The EU also agreed in 2022 on extending the ETS to cover road transport and buildings (a new mechanism sometimes referred to as 'ETS2'). WWF had strong reservations about this move, as a carbon price in these sectors could hit the most vulnerable households hardest without providing the means to actually cut emissions.

To compensate for such potential impacts, and after fraught negotiations, the EU agreed to set up a Social Climate Fund (SCF). WWF welcomed this initiative, and the decision to bring in the SCF at least one year before the ETS2, but **criticised the fact that the fund will have a fixed size** of only €86.7 billion for the period 2026-2032 and will not therefore increase with the carbon price.

WWF also strongly opposed the decision by EU co-legislators not to exclude investment in fossil fuels from the SCF, which **WWF had strongly advocated for**, in collaboration with many other social and climate organisations.

WWF also continued to run the Regions Beyond Coal project, financed by the German Environment Ministry (EUKI). As part of this, we produced a **briefing for mayors** to ensure a just transition in EU Coal Regions as well as a report on the **role of municipality-led renewable energy projects**.

## LAND USE, LAND USE CHANGE AND FORESTRY

In December 2022 the EU institutions also reached agreement on the revised Land Use, Land Use Change and Forestry (LULUCF) Regulation, which includes an increased net carbon dioxide removal target of 310 Million tonnes by 2030.

WWF welcomed this increase but had **advocated for a more demanding, science-based target** that reflected the EU LULUCF sector's potential role in averting runaway climate change and tackling the biodiversity crisis. WWF also regretted the inclusion of new 'flexibilities' (i.e. offsetting) into the legislation, undermining further the already limited removal target. On the other hand, we were successful in arguing against any additional flexibilities with the sectors covered by the Effort Sharing Regulation, and against the future merging of the LULUCF sectors with non-CO2 emissions from agriculture to create an AFOLU (Agriculture, Forest and Land Use) sector.

## BIOENERGY: BURNING TREES IN THE NAME OF CLIMATE ACTION

The Fit for 55 package also includes a revision of the Renewable Energy Directive (RED). Negotiations on this, which are still ongoing, include among other things what types of biomass Member States can subsidise and count as carbon neutral renewable energy.

This is a critical issue, as science has shown that burning trees can increase emissions for decades or even centuries in comparison to fossil fuels. In September the European Parliament decided to take this into account during **its position** by voting for a cap on primary woody biomass. WWF is now calling on Member States to support this.

## INTERNATIONAL CLIMATE NEGOTIATIONS: COP27

Last November, the UNFCCC's annual Conference of Parties (COP27) took place in Sharm El-Sheikh in Egypt. WWF EU **followed the European developments closely** and was present as part of a highly visible WWF delegation at the summit, which organised more than 60 events and launched **several initiatives** and reports.

The EU was particularly vital in the unexpected, yet welcome, breakthrough on a 'loss and damage' fund. Elsewhere, progress was disappointing, with a push for language supporting the phase-out of all fossil fuels failing to make the final decision text and risking to make the loss and damage fund a 'fund for the end of the world'. While the EU supported this higher ambition, WWF is mindful of the work needed to realise this on the ground, and continues to advocate for strengthening the EU's acceleration towards a just transition to renewable energy as it shifts away from Russian gas.



Protest action in front of the European Parliament to call for an end of free permits to pollute for heavy industry.



Frans Timmermans, Executive Vice-President of the European Commission, at COP 27 in Sharm El Sheikh, Egypt





BUILDING TRULY SUSTAINABLE AND  
INCLUSIVE ECONOMIES

# SUSTAINABLE ECONOMIES

**T**ransforming our economies to be sustainable is a monumental task that requires bold leadership and a strong commitment to action. But the opportunities presented by a sustainable economy are immense, and finance is a critical part of the puzzle.

In 2022, we worked to mobilise financial support for sustainable economic activities, discourage support for harmful ones and ensure that investments are aligned with the EU's climate, environmental, and social goals.

- WWF campaigned against the inclusion of nuclear and gas-fired power in the EU Taxonomy and started legal action to prevent this legislation from being greenwashed.
- The Corporate Sustainability Reporting Directive was adopted and now requires nearly 50,000 companies across the EU to publish clear climate transition plans, sustainability targets, and environmental due diligence policies.
- The European Commission released its proposal for the Sustainable Corporate Due Diligence Directive. This legislation aims to hold businesses accountable for their impacts on human rights and the environment.

“Despite some positive steps in promoting sustainable finance, the **European Union’s credibility and effectiveness** in this area have been undermined by the **inclusion of gas-fired power and nuclear power in the EU Taxonomy** as environmentally sustainable activities. The EU has yet to fully commit to building a truly sustainable and inclusive economy that prioritises the well-being of both people and the planet.”

SEBASTIEN GODINOT, SENIOR ECONOMIST, WWF EUROPEAN POLICY OFFICE



# A ROLLERCOASTER YEAR FOR SUSTAINABLE FINANCE

The European Union has made some progress in promoting sustainable finance and achieving a more sustainable future, notably, the recent agreement on the **Corporate Sustainability Reporting Directive**. However, one major hurdle to the EU's efforts to greening finance has been the inclusion of gas-fired power and nuclear power in the **EU Taxonomy**.

## THE TAXONOMY FIGHT IS NOT OVER

In January, the European Commission sparked huge controversy with a proposal to include fossil gas-fired power and nuclear power in the EU Taxonomy, the EU's green finance guidebook. Labelling those harmful energy sources as environmentally sustainable activities has been widely condemned as greenwashing. As a result, the credibility of the EU's sustainable finance efforts has been called into question. To truly build a sustainable and inclusive economy, the EU must correct the course and prioritise the well-being of both people and the planet.

This proposal was met with sharp criticism from the EU Platform on Sustainable Finance, scientists, financial institutions and civil society. The ball was in the EU Parliament and Council court, which had four months to trigger a vote and reject the legislation.

To counter the proposal - and against all odds - WWF launched an emergency advocacy action, and called on MEPs to vote the proposal down. Other campaign groups joined the fight, and overall, close to half a million people spoke out against this blatant greenwashing by signing different petitions and sending emails to their MEPs. Despite our best efforts and a **successful committee vote rejecting the act**, MEPs in plenary failed to listen to the science and **voted to keep gas-fired power and nuclear power in the EU Taxonomy**.

While we lost this battle, but are not giving up the fight. Instead, we have started legal action with other NGOs to prevent fossil gas-fired power from being included in the Taxonomy. In September, we filed an internal review request as a first legal step. The Commission has until February 2023 to reply and depending on the its answer, we will ask the European Court of Justice to rule on it.

## TRANSPARENCY AND ACCOUNTABILITY FOR BUSINESSES: A NEW ERA IN THE EU?

In February 2022, the European Commission released its much-anticipated proposal for the Sustainable Corporate Due Diligence Directive. This legislation is intended to hold businesses accountable for their impacts on human rights and the environment, and WWF believes this law is crucial for the success of the sustainable finance agenda and the European Green Deal.

However, WWF is concerned that the proposal has lost its ambition since it was first announced in 2020. Notably, the Commission's proposal excludes 99% of EU businesses, including small and medium-sized enterprises in high-risk sectors, and does not include due diligence on climate change.

Under pressure from several Member States, the Council further weakened the Commission's proposal. Member States eliminated the

UNLAWFUL  
UNSCIENTIFIC  
UNACCEPTABLE

WWF IS TAKING LEGAL ACTION  
AGAINST THE EU'S GREENWASHING OF FOSSIL GAS





requirement for businesses to conduct due diligence throughout their entire value chain and removed the link between CEOs' bonuses and the achievement of sustainability targets. On top of that, the financial sector is now excluded from the mandatory scope of the directive - leaving it to each Member State to decide whether their financial companies can profit from human rights abuses and environmental damage without consequences. The directive will be voted on by the European Parliament, in Spring 2023, providing the last opportunity to make it truly sustainable.

Another critical law that marked 2022 is the Corporate Sustainability Reporting Directive (CSRD). After its approval in June of that year, the CSRD now requires nearly 50,000 companies across the EU to publish clear climate transition plans, sustainability targets, and environmental due diligence policies. In addition, a very detailed standard is in the making, that will massively increase the comparability of corporate reporting. This is a big step forward. Since 2017, WWF worked hard to promote this legislation and ensure that it maintained a high level of ambition.

### EUROPEANS NEED GREENER AND MORE ENERGY-EFFICIENT HOMES

WWF advocated hard for the revision of the Energy Performance of Buildings Directive to include bold and innovative financing mechanisms, such as Mortgage Portfolio Standards. These standards would require banks' mortgage portfolios to meet specific energy efficiency targets and incentivise them to design and propose financing solutions for green renovations. Against this backdrop, WWF joined the **'Unlock' campaign**, a CSO coalition calling on EU institutions to mobilise the financing needed to renovate European homes and make them greener. In October, the Council reached a disappointing compromise on the directive's revision, but several Member States called for more ambition. The Parliament will adopt a position in the plenary session of February 2023, after which the dialogue negotiations will begin.

Another important piece of legislation that the EU reviewed this year is the Consumer Credit Directive. This law aims to protect the rights of consumers who take out credit and to ensure a high level of transparency and fairness in the credit market. Initially, the legislation did not include any reference to the green transition. However, WWF advocated ensuring that sustainable lending is accessible and affordable for consumers who wish to undertake renovations and green projects. In early December, the EU decision makers reached a provisional agreement and included a review clause in the directive. This clause instructs the Commission to analyse the evolution of the green loans market and assess the need for additional measures relating to such credit.



WWF JOINED THE **'UNLOCK' CAMPAIGN**, A CSO COALITION CALLING ON EU INSTITUTIONS TO MOBILISE THE FINANCING NEEDED TO RENOVATE EUROPEAN HOMES AND MAKE THEM GREENER



EU POLICIES TO SUPPORT A  
SUSTAINABLE BLUE FUTURE ARE PART  
OF THE FIGHT AGAINST THE CLIMATE  
AND BIODIVERSITY CRISES

# OCEANS

Continuing its work with the EU institutions and Member States, WWF is striving to ensure that legislation seeking to deliver a thriving blue economy, sustainable seafood, renewable energy and space for nature are effectively implemented.

In 2022, this included:

- Assessing the success of Member State strategies to adopt an ecosystem-based approach when planning maritime activities
- Advocating for at least 30% of EU seas to be effectively protected by 2030 and for an ambitious marine target in the EU nature restoration law
- Supporting seafood trade companies from 20 Member States to call for legislation that secures fisheries transparency and seafood traceability in the EU
- Leading research on how effective implementation of EU legislation helps fight illegal, unreported and unregulated (IUU) fishing worldwide
- Proposing measures to help close the gaps that allow seafood from IUU fishing to enter the EU market

“For sustainable food systems, renewable energy, climate mitigation and thriving ecosystems, we must remember that **there is no green without blue.** We need all hands on deck, from strong policy creation in Brussels to effective national implementation, to deliver climate action in harmony with nature restoration.”

ANTONIA LEROY, HEAD OF OCEAN POLICY, WWF EUROPEAN POLICY OFFICE



# FACING UP TO THE CHALLENGES OF POLICY IMPLEMENTATION

To meet ambitions of the **European Green Deal**, the EU Biodiversity Strategy, as well as EU commitments to the **UN 2030 Agenda**, we need robust implementation of the policies that support sustainable management and development of at-sea activities, and which ensure the seafood we consume is legal and sustainable. Unfortunately, Member States are falling short.

## PLANNING FOR A NATURE POSITIVE AND CARBON NEUTRAL EU

In 2022, WWF assessed the maritime strategies of 15 coastal Member States to sustainably manage marine areas and resources, revealing that **none are on course to meet EU climate and nature goals**. These strategies, manifested as long-term national plans for economic and nature conservation activities within each country's marine and coastal area, are legally required under the EU Maritime Spatial Planning (MSP) Directive. While the deadline to submit them to the European Commission fell on 31 March 2021, six Member States, **five of which are in the Mediterranean region**, have yet to deliver their plans.

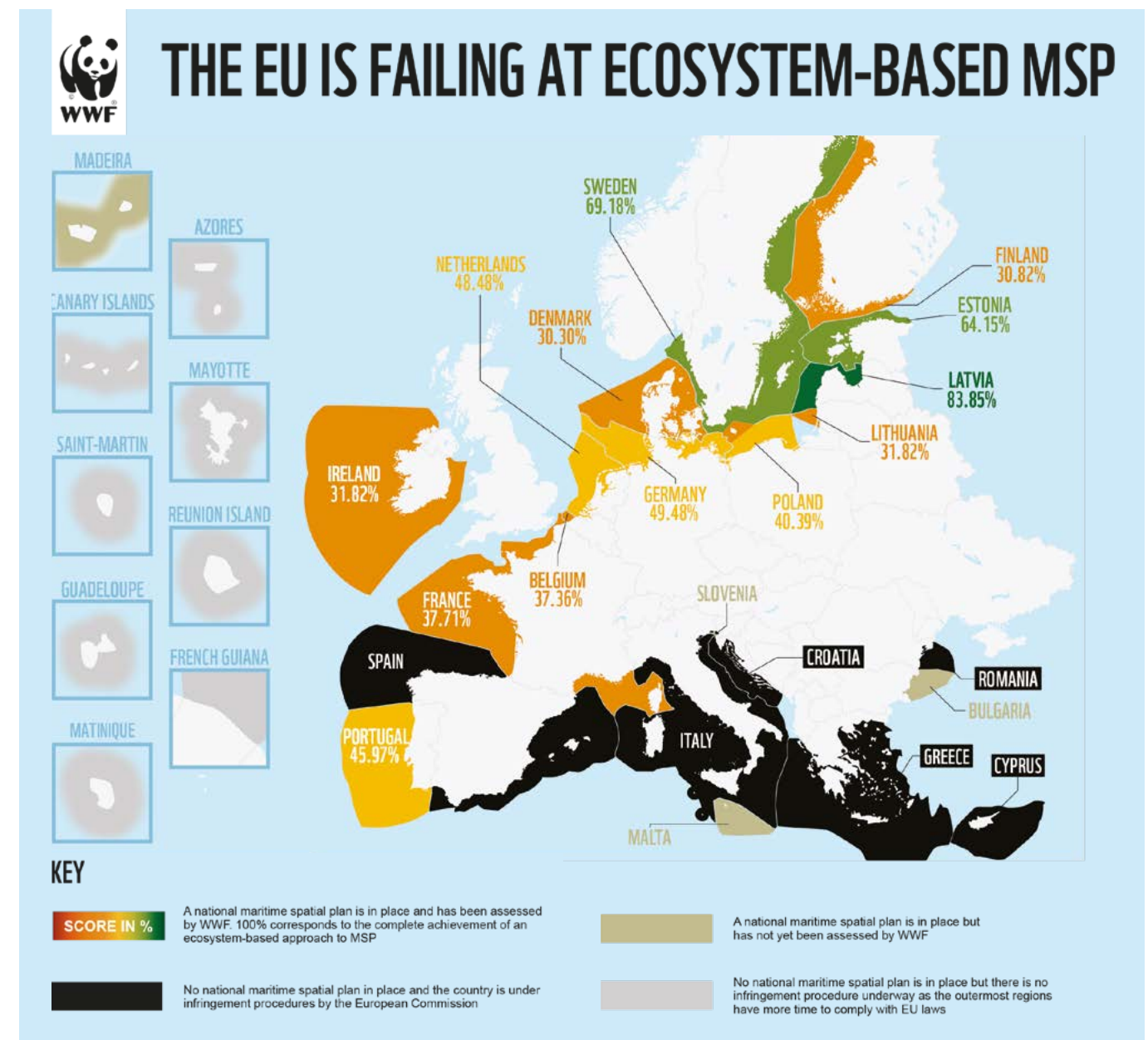
MSP is an essential tool for balancing human activities and space for nature to thrive. This forward-looking process considers all economic sectors and ecological factors related to a marine area and then allocates space, both geographically and over time, to various activities. WWF advocates for an ecosystem-based approach to MSP, whereby the ecological boundaries of marine ecosystems are considered when allocating space at sea. Critical pieces of EU legislation such as the Biodiversity Strategy and REPowerEU hinge on the success of robust MSP, and the Member States' continued failure to adopt an ecosystem-based approach will

make it increasingly difficult for the EU and its neighbours to overcome the impacts of climate change.

WWF is calling for all Member States to ensure their maritime strategies deliver effectively managed protected areas that cover at least 30% of national waters, with at least 10% under strict protection. These plans must also ensure that offshore renewable energy development is kept out of protected areas, and support transboundary cooperation between EU and non-EU countries to **reduce harmful impacts to nature** from this type of infrastructure. Finally, stakeholders must be involved and consulted in all phases of MSP, with national plans covering all sea areas and continuously adapted as new data becomes available and new pieces of legislation come into force.

## BALANCING CONSERVATION AND RENEWABLE ENERGY

Failure to align with an ecosystem-based approach to planning maritime activities was also reflected in the **European Parliament's response** to the European Commission's offshore renewables strategy, which was adopted at the start of the year. As part of achieving climate neutrality by 2050, the Commission is planning to increase offshore renewable energy capacity by 500% by 2030 and 2500% by 2050. Disappointingly, the Parliament's position failed to emphasise the need for an ecosystem-based



approach to planning renewable energy activities in EU waters, nor did it take a stance on preventing offshore energy development in ecologically-sensitive areas. It also failed to mention the need to conserve coastal and marine habitats that store and remove carbon.

Later in the year, however, the Parliament adopted its **resolution on strengthening ocean governance and biodiversity** which rebutted many of these points by including a call for full implementation of the MSP Directive “through an integrated and ecosystem-based approach ensuring the protection of marine ecosystems”. It also recognised the crucial need to integrate coastal blue carbon ecosystems like mangroves, tidal salt marshes and seagrasses in the European Green Deal. The resolution, which establishes the Parliament's position for how EU and Member State actions should better safeguard our ocean and ensure a balance for human activities, has seen nature cemented at

the foundation of what will drive the anticipated growth of offshore renewable energy and the upcoming EU Nature Restoration Law. However, fisheries stands out as the crucial gap to close, as the topic has been largely left out of the resolution while overfishing continues to be one of the main drivers of biodiversity loss in European seas.

## KEEPING CONTROL: SUSTAINABLE SEAFOOD IN THE EU

Trilogue negotiations on the EU Fisheries Control Regulation – the rules governing the monitoring, inspection and enforcement for fishing operations in EU waters, and activities of the EU fleet globally – began in summer 2021 and continued across 2022. A revised EU fisheries control system is a unique opportunity to establish a robust system of control and traceability of fish and seafood on the EU market.

**WWF IS CALLING FOR ALL MEMBER STATES TO PROTECT AT LEAST 30% OF NATIONAL WATERS AND ENSURE THAT OFFSHORE RENEWABLE ENERGY DEVELOPMENT IS KEPT OUT OF PROTECTED AREAS**



THE REVISION  
OF THE EU  
FISHERIES  
CONTROL  
REGULATION  
MUST CLOSE  
A LOOPHOLE  
THAT WOULD  
ALLOW UP TO  
**40%**  
OF WHAT IS  
CAUGHT TO  
GO MISSING  
FROM RECORDS,  
AND UP TO  
**50%**  
IN THE CASE OF  
TUNA



© Shutterstock / Chrispictures

Since the revision began in spring 2018, one loophole which has opened would relax the rules for what fishers must report as catches, allowing up to 40% of what is caught to go missing from records, and up to 50% in the case of tuna. This has proven to be one of the most contentious issues, creating a great deal of uncertainty around the future of the Control Regulation.

At the start of the year, together with 23 other NGOs, WWF published **an open letter to the three EU institutions** calling on them to ensure that the revised Regulation will contribute to sustainable fisheries management that reduces the sector's impact on the environment, and promotes the protection of species and ecosystems.

As a follow-up to a 2021 activity, with a coalition of eight other NGOs, WWF again collaborated with the wholesalers, retailers and food

distribution companies representing 20 Member States and seafood trade both within and outside of Europe. At a joint webinar, speakers from all sectors demonstrated their strong support for EU leadership to adopt critical measures to achieve **full digital traceability for all seafood products entering the EU supply chain**, noting the EU's significance as the world's largest seafood market.

## KEEPING ILLEGAL SEAFOOD OUT OF THE EU

Throughout 2022, WWF continued its close collaboration with the Environmental Justice Foundation, The Nature Conservancy, Oceana, and the Pew Charitable Trusts to promote EU leadership in improving global fisheries

transparency and governance to end illegal, unreported and unregulated (IUU) fishing.

IUU fishing plunders our ocean, undermines efforts for nature conservation and restoration, and puts enormous pressure on law-abiding operators that compete for the same stocks. Fortunately, our research has found that the EU Regulation to tackle IUU fishing has yielded positive results. For instance, the EU's 'carding scheme' – which warns and potentially sanctions non-EU countries for failing to cooperate in the fight against IUU fishing – **has decreased the prevalence of IUU fishing** and prompted improved legislation, compliance and enforcement measures in several countries. Similarly, **the EU has addressed loopholes** that previously allowed its vessels to rapidly change what nation's flag they operate under in order to evade fisheries laws.

However, seafood products linked to IUU fishing can still enter the EU market. By assessing **how Member States detect and block products sourced from IUU fishing from entering the EU** at their borders, we have uncovered a striking lack of consistency in how these mandatory import controls are implemented across the EU and that a large number of seafood imports originated from countries with a higher risk of IUU fishing.

The availability of such products on the market means that the EU and its Member States are inadvertently supporting these illicit activities, which can also be connected to human and labour rights abuses. Improved and harmonised implementation of the rules across all national authorities is essential to close the gateways that currently allow products from IUU fishing to enter the EU.

**IMPROVED AND HARMONISED IMPLEMENTATION OF THE RULES IS ESSENTIAL TO CLOSE THE GATEWAYS THAT CURRENTLY ALLOW SEAFOOD LINKED TO ILLEGAL, UNREPORTED AND UNREGULATED FISHING TO ENTER THE EU**



CHANGING THE FUNDAMENTALS  
BEHIND EU POLICY MAKING

# EU AFFAIRS & GOVERNANCE

**H**ow do we measure 'progress' in our society? Recent crises have shown that we must move towards a new economic model based on more holistic indicators than purely GDP growth to avoid both people and planet suffering. WWF has been advocating towards this transition to a 'wellbeing economy' on several fronts. Highlights in 2022 included:

- In April, the EU's 8<sup>th</sup> Environment Action Programme entered into force, including provisions for putting human and planetary wellbeing, rather than GDP growth, at the heart of EU policy making - a major win for WWF;
- WWF's analysis of the new Better Regulation Toolbox fed into the European Parliament's report on Better Regulation adopted in May 2022, which included our calls for a clear definition of the 'do no significant harm' principle;
- In June, the European Parliament adopted a report on the EU implementation of the Sustainable Development Goals (SDG) which endorsed many of WWF's priorities.

"Much lip service was paid in 2022 to putting **human and planetary wellbeing** - rather than GDP growth - at the heart of EU policy making. But will this lead to concrete changes in how our laws and policies are designed? Now the time has come to **put these promises into action!**"

TYCHO VANDERMAESEN, HEAD OF PUBLIC AFFAIRS, WWF EUROPEAN POLICY OFFICE





# MAKING EU POLICIES MORE SUSTAINABLE

Widening inequalities - exacerbated by the global pandemic and cost of living crisis - have shown that as a society, we urgently need to rethink the way in which we define 'progress', to move away from the inadequate paradigm of GDP growth towards a new, more sustainable, economic model.

WWF has been advocating for the EU to transition towards a 'wellbeing economy', which starts from the idea that public interests should determine economics and not the other way around. Rather than pursuing economic growth through narrowly defined indicators, a wellbeing economy monitors and values what truly matters: our health, nature, education, and communities.

The year 2022 saw several opportunities to further this vision. These included the implementation of the Sustainable Development Goals, the implementation of the EU's 8<sup>th</sup> Environment Action Programme, and the review of the EU's Better Regulation Agenda.

## IMPLEMENTATION OF THE SUSTAINABLE DEVELOPMENT GOALS

In June 2022 the European Parliament adopted a report on SDG implementation which endorsed many of WWF's priorities: such as the implementation of a 'whole of government' approach to the SDGs, the importance of ensuring meaningful involvement of civil society, the need to develop an EU SDG implementation strategy, and an emphasis of the importance of pursuing a 'beyond GDP' strategy and wellbeing economy.

Another big highlight on the wellbeing economy was the United Nations Stockholm +50 conference on 2-3 June, at which WWF co-organised a side-event on "Wellbeing Economies: A new economic approach for human and planetary health" which explored how different countries are prioritising wellbeing in their policies.

To coincide with S+50, WWF with WeAll and EEB published a joint briefing on how and why to move Beyond GDP, summarising the current debate and introducing the most relevant alternative indicators and dashboards currently in use around the world.

Speaking at the event, Commissioner Sinkevičius highlighted that advancing towards a wellbeing economy had been included in the legally binding EU 8<sup>th</sup> Environment Action Programme for the first time earlier this year.

## 8<sup>th</sup> ENVIRONMENT ACTION PROGRAMME

The EU's Environmental Action Programmes (EAP) outline the overall direction of EU environmental policy, putting in place the enabling conditions to ensure that policies can achieve their goals. The 8<sup>th</sup> EAP, which was adopted in 2021, sets out the direction for EU environmental and climate policy action until 2030, with the aim of building on the European Green Deal. The final EAP includes provisions for putting human and planetary wellbeing, rather than GDP growth, at the heart of EU policy making - a major win for WWF.

In April, the 8<sup>th</sup> EAP entered into force, and to help guide its application in practice, WWF published **the EU's To-Do-List for immediate action**, outlining actions WWF considers to be key, and offering ways forward for the EU. This includes a call for the EU to produce a 'beyond GDP' report and dashboard; to set a binding deadline for phasing out fossil fuel subsidies and to deliver the methodology to identify and assess other environmentally harmful subsidies; to



integrate the 8<sup>th</sup> EAP's commitments on better regulation, notably on the cost of inaction; to ensure the sustainable use of soil and transform the EU's food system to protect and restore biodiversity; to develop an initiative to decrease the EU's material consumption footprints; and to advance towards the recognition of a right to a clean, healthy and sustainable environment internationally.

## BETTER REGULATION

The Better regulation toolbox was updated at the very end of 2021 and new requirements to mainstream the SDGs, to ensure 'do no significant harm' and to ensure climate consistency should now be integrated into impact assessments for new proposals and for evaluations. **WWF published a paper analysing these new rules**, which sets out WWF's reaction to and recommendations on the major elements of the new guidelines and toolbox, such as the introduction of the 'one in, one out' rule, 'do no significant harm' and mainstreaming of the Sustainable Development Goals (SDGs).

This analysis fed into the European Parliament's report on Better Regulation adopted in May 2022, which included our calls for a clear definition

of the 'do no significant harm' principle, which aims to ensure all policies are aligned with the European Green Deal.

## LOOKING AHEAD

For 2023, we have the European Parliament's Beyond Growth conference to look forward to in May, with the participation of the three Presidents of the EU institutions (Ursula von der Leyen, Roberta Metsola and Charles Michel). The conference will be a key moment for raising further awareness of our recommendations on the wellbeing economy and gathering commitments from decision makers.

Furthermore, the European Commission is preparing to publish the Beyond GDP dashboard committed to in the 8<sup>th</sup> EAP, and the 2023 Annual Strategic Foresight report will also focus on Beyond GDP.

Last but not least, the next milestone for accountability on the EU's implementation of the SDGs is the UN High Level Political Forum (HLPF) in July 2023. The European Commission has committed to reporting on the EU's progress on SDG implementation by developing a voluntary review that will be presented at HLPF.

THE  
**8<sup>th</sup>  
EAP**  
PUTS HUMAN  
& PLANETARY  
WELLBEING  
AT THE HEART  
OF EU POLICY  
MAKING



DURING A TUMULTUOUS YEAR ON THE GEOPOLITICAL STAGE, WWF ENGAGED IN A NUMBER OF CRITICAL PROCESSES TO ENSURE CONTINUED FOCUS ON BIODIVERSITY AND CLIMATE ACTION IN THE EU'S EXTERNAL ACTION.

# INTERNATIONAL PARTNERSHIPS

Following the integration of the European Green Deal objectives in the EU's new "Global Europe" programming, advocacy has continued to ensure that this translates into higher spending on biodiversity and climate.

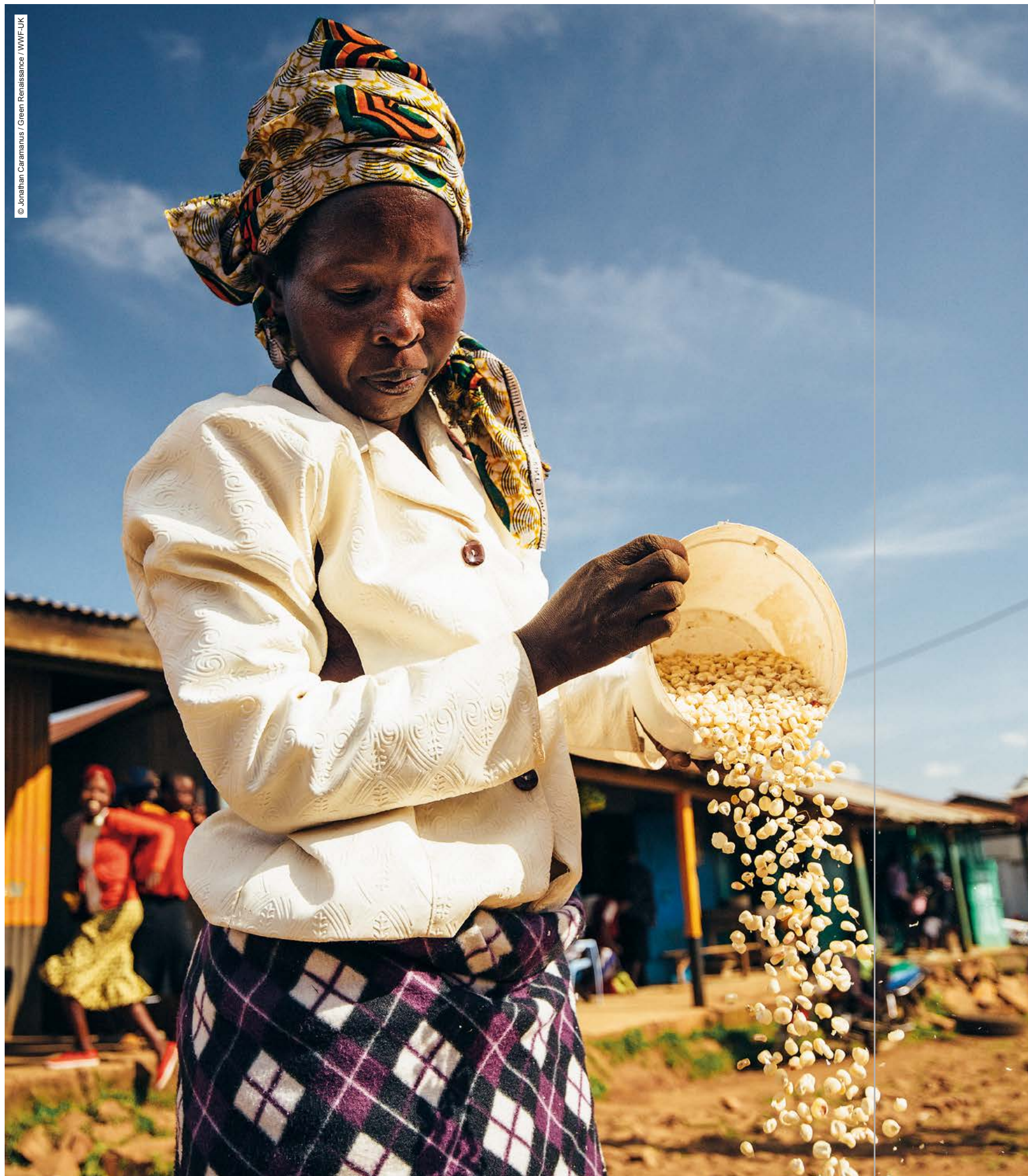
- For the NatureAfrica programme, WWF has advocated for an inclusive, sustainable and nature positive African development pathway.
- The EU-African Union summit failed to achieve the envisaged new partnership of equals, or do much for biodiversity, the climate or vulnerable communities.
- At COP15 in Montreal, the European Commission confirmed its pledge to provide € 7bn biodiversity spending, but now, a significant increase will be needed from a variety of sources, including public and private finance.
- Together with WWF offices in Central and Eastern Europe and Ukraine, we have stressed the importance of ensuring a sustainable recovery process in Ukraine in line with the EU Green Deal.

"The global goal of reversing biodiversity loss by 2030 must now be backed up by concrete action and the promised resources. **The EU must substantially increase support to partner governments** to achieve this objective, including through financing, technical assistance and capacity building"

KATARINA MACEJAKOVA, HEAD OF EU INTERNATIONAL PARTNERSHIPS, WWF EUROPEAN POLICY OFFICE







# 'GLOBAL EUROPE' - WILL IT DELIVER FOR BIODIVERSITY & CLIMATE?

2022 was marked by the roll out of the new Global Europe instrument, and WWF advocacy for effective action on and financing for biodiversity and climate. WWF contributed to the EU's NaturAfrica and Switch Asia programmes, engaged in the EU-African Union Summit, and also provided a blueprint for the sustainable reconstruction of Ukraine after the war.

## ROLLING OUT OF EXTERNAL ACTION PROGRAMMES

The programming of the Global Europe instrument was concluded in December 2021 following the adoption of multi-annual indicative programmes (MIPs), which set out priority areas for EU international cooperation for 2021-27. WWF EU supported WWF offices across the world in their engagement with EU Delegations and the various technical teams working to identify and formulate EU national and regional programmes and plans.

WWF offices in Africa provided considerable input on the consultation processes related to the **EU NaturAfrica flagship programme**. With WWF presence in four of the six NaturAfrica transboundary landscapes and across 14 countries in Sub-Saharan Africa, the NaturAfrica portfolio of programs and approach is well aligned with the **WWF strategic plan for Africa** aiming at inclusive, sustainable and nature positive African development pathway, where the value of nature is harnessed for the prosperity of both people and planet.

WWF also contributed to the formulation of the new Switch Asia-EU flagship programme supporting Asian countries and businesses for

their transition towards an inclusive green and circular economy. In September, colleagues from WWF-Philippines attended **Switch-Asia Programme's 4th Annual Meeting** in Thailand.

## A NEW PARTNERSHIP WITH THE AFRICAN UNION?

The sixth EU-African Union (AU) Summit that took place in February in Brussels, was expected to be a turning point for a renewed partnership between the EU and the AU. **WWF advocated** for both parties to use this opportunity to establish a more balanced, collaborative, and equal partnership, and to move from words to action to advance human development and include concrete commitments to support the continent to implement ambitious and just climate and biodiversity actions. WWF also co-organised a **panel discussion** on how the EU Africa partnership can support a green transition to unlock long-term economic prosperity, poverty reduction and ecosystem resilience.

We also joined other CSOs to call for **people- and development-centred climate and energy goals** ahead of the EU-AU Summit.



THE EUROPEAN  
COMMISSION  
CONFIRMED A  
DOUBLING OF  
BIODIVERSITY  
SPENDING,  
PLEDGING  
€ 7bn  
DURING  
2021-2027

In May, WWF colleagues working on energy access and renewable energy in Africa had the opportunity to meet with Commissioner Urpilainen's cabinet to discuss these recommendations.

Unfortunately, despite commendable declarations, the summit failed to achieve the envisaged new partnership of equals, or do much for biodiversity, the climate or vulnerable communities. Commitments to biodiversity protection were vague and the summit failed to mention NaturAfrica, the new EU deforestation law or the EU Farm to Fork strategy, although these initiatives could constitute a considerable step forward in environmental protection and a bold opportunity to minimise the EU's negative impacts on African biodiversity.

## EU FINANCING FOR GLOBAL BIODIVERSITY

The Kunming-Montreal Agreement adopted in December under the UN Convention on Biological Diversity (CBD) (see p. 19) represents a major milestone for biodiversity, but now requires swift implementation and mobilisation of the promised resources. One of the most contentious issues in the negotiations was the finance package to support conservation efforts globally, and particularly in developing countries. We welcome that the European Commission confirmed a doubling of biodiversity spending in external action, pledging € 7bn during 2021-2027. However, a significant increase in funding for biodiversity is required from all sources, including overseas development assistance, domestic biodiversity finance, and public and private finance. Only with enough money in the right places and with the urgency required can transformative action really take effect. This includes repurposing incentives such as subsidies that are harmful to biodiversity.

## DEFORESTATION

EU decision makers concluded negotiations for an EU deforestation law (see p. 15), reaching a historic agreement. The regulation will come into force in 2024, but a lot of detail still needs to be resolved. This includes determining how the law will interact with the Voluntary Partnership Agreements or with the newly signed EU Forest Partnerships.

Global Europe programmes will need to prioritise support to smallholders to mitigate any additional burdens the law might place on them. The EU will also need to support producer countries to tackle deforestation at national level, rather than simply in the EU supply chains and to develop agreements with governments

in forested countries to tackle the root causes of deforestation such as weak forest governance and unclear land tenure.

We welcome the signature of the first five Forest Partnerships that the European Commission signed with Guyana, Mongolia, the Republic of Congo, Uganda and Zambia during the COP27 in November and the EU pledge to invest € 450 million by 2024 to support these partnerships. Much will now depend on translating these commitments into concrete deliverables to protect, restore and sustainably manage forests.

## LEVERAGING PRIVATE FINANCE FOR SUSTAINABLE DEVELOPMENT

In September, the Regional Director of WWF Africa joined the new **EU high-level group of experts (HLEG)** on scaling up sustainable finance in low and middle-income countries (LMICs). The group's task is to identify how the European Commission could attract financing from the private sector for the massive investments required to tackle the most pressing global challenges and ensure sustainable development. The recommendations, expected to be presented around mid-2023, will inform a new EU strategy to scale up sustainable finance in low- and middle-income countries. WWF is advocating for private finance to deliver greater investment in sustainable development, as well as for improved integration of environmental and climate risks in the EU's investments, especially in the context of the Global Gateway.

## BUILDING BACK BETTER IN UKRAINE

In order to address the ramifications of the war in Ukraine, WWF has been advocating for new and additional EU sources of development aid to cover the humanitarian crisis, and cautioned that redirecting aid from existing programmes, such as Global Europe, would undermine long-term efforts and can have unintended long-lasting global implications for peace, stability, and the green transition.

In our briefing paper **“Boosting EU resilience and independence through the European Green Deal”** (May 2022), we provided decision makers with recommendations on how the EU can boost its resilience and independence through the European Green Deal.

WWF has also already started working on what the post-war reconstruction of Ukraine should look like. In working closely with our colleagues in the offices in Central and Eastern Europe

## SUSTAINABLE FISHING IN ASIA AND AFRICA

As part of the EU funded Switch Asia programme, WWF-Philippines and WWF-Austria started the **Mindoro Strait Sustainable and Equitable Tuna for Bankability Project** in 2022. This initiative aims to help tuna fishers increase the value of their catch by improving quality and reducing post-harvest losses.

Given the current uncertainty in the tuna fishing sector, **the project** will also help communities identify alternative livelihoods to supplement their income. Both increasing the value of tuna fishing and providing additional income streams will empower fishers to continue sustainable fishing practices.

The EU-funded **Kecofish project** led by WWF-Kenya supports small-scale fishers in Kenya, who play a key role in the national economy, providing a vital source of food and nutrition, employment and foreign exchange. However, coastal fishing communities are some of the country's poorest and are critically dependent on fish for nutrition. The project aims at enhancing the capacities of those communities for poverty reduction and the protection of natural resources.



(CEE) and Ukraine, we have been engaging with EU institutions, stressing the importance of ensuring a sustainable recovery process that is coherent with the ambitions of the EU Green Deal. In September, WWF released a report **“Ukraine - A sustainable economic recovery for people and nature”** in cooperation with the Boston Consulting Group, aiming at bringing a civil society voice into the reconstruction agenda. This report highlights the benefits that a sustainable and nature-friendly reconstruction would bring, including enhanced security with less dependence on imports of fossil fuels and accelerated economic development and job creation

## CHANGES IN THE EU DEVELOPMENT FUNDING ENVIRONMENT FOR CIVIL SOCIETY

The EU has a long-standing commitment to working with the civil society sector, and

supporting it financially - which makes it all the more disappointing that the sector has been largely excluded from the implementation of the Global Europe programmes so far. Instead, EU external funding has been mainly channeled to and managed by international organisations and EU development agencies.

As a member of CONCORD, the European confederation of NGOs working on sustainable development and international cooperation, WWF joined a hearing at the European Parliament's Development Committee in November to brief the MEPs on the challenging role of CSOs in the implementation of Global Europe. WWF noted that the partnership practices under Global Europe no longer support long-term sustainability of the civil society sector, and limit the ability of CSO partners to ensure their relevance, health and adaptability. This is particularly crucial at a time when civic space in many countries around the world continues to decline.



# OUR DONORS, PARTNERS & ALLIES

The success of WWF’s policy work at EU level depends on external funding for our priority work, a coordinated and supportive network and strong alliances with key stakeholders and partners.

## WWF NETWORK

Throughout the year, many WWF offices provided WWF EU with their expertise and advocacy support. We are particularly grateful to the 18 network offices which contributed financially to our policy and communications activities and campaigns. This support makes it possible for WWF EU to engage in a broad range of policy and legislative processes and represent the voices and concerns of millions of WWF supporters around Europe and the world.

## FOUNDATIONS

WWF EU is supported both financially and in terms of policy development by major foundations. We are grateful for the continued support from the European Climate Foundation, the KR Foundation, the Walton Family Foundation, Oceans 5 and the National Philanthropic trust, and the Ocean Azul Foundation.

## EUROPEAN COMMISSION AND DEVELOPMENT AID AGENCIES

We receive an operating grant from the EU Climate, Infrastructure and Environment Executive Agency (CINEA) through the LIFE Programme. In 2022, we also received project funding via H2020 Energy, Environment, Resources; the Research Executive Agency (REA); the Development Education and Awareness Raising Programme (DEAR); and the German Agency for International Cooperation (GIZ).

## CIVIL SOCIETY

WWF EU works with other organisations in various alliances: as a member of the ten biggest EU environmental NGOs in Brussels (Green 10 coalition), the European NGO confederation for relief and development (CONCORD), the Climate Action Network (CAN Europe), the Sustainable Europe coalition, the Living Rivers Europe coalition, the European Habitats Forum (EHF), and the Offshore Coalition for Energy and Nature. WWF is also a member of the EU IUU Fishing Coalition and the EU Fisheries Control Coalition.

We also contribute to the following organisations: Fédération des Associations Européennes (FAIB), Market Advisory Council, North Sea Advisory Council, the Coalition for Energy Savings, Renewables Grid Initiative, Seas At Risk, EUFIC, and the European Environmental Citizens Organisation for Standardisation (ECOS).



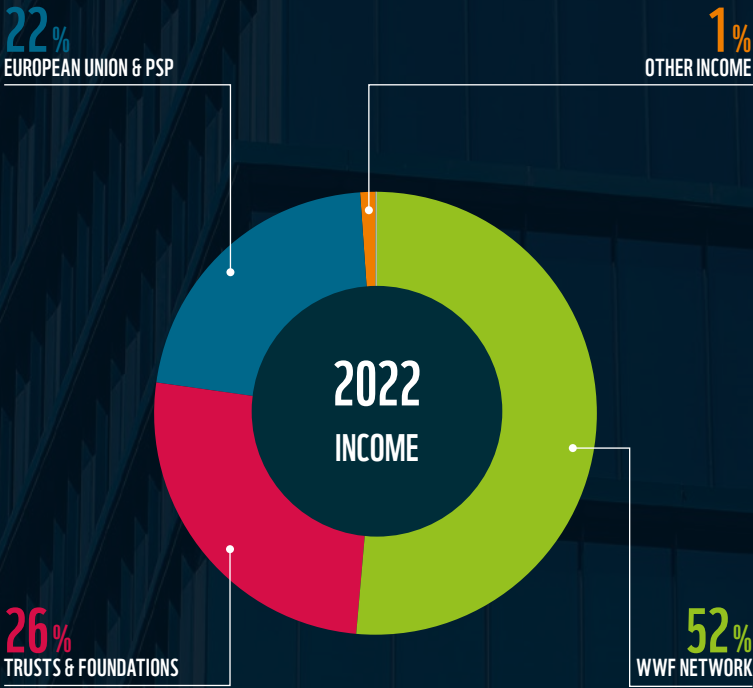
During 2022, the WWF European Policy Office has received EU funding via the following grants:

- Executive Agency for Small and Medium-sized Enterprises (EASME) LIFE20 NGO/SGA/BE/200016 — WWF EPO Operating Grant
- Research Executive Agency (REA) NUMBER 101060879 — FISH-X
- Raising public awareness of development issues and promoting development education in the European Union under Grant Agreement number: EuropeAid/160048/DH/ACT/MULTI — Eat4Change
- Research Executive Agency (REA) NUMBER 862480— SHOWCASE
- Horizon 2020 research and innovation programme under Grant Agreement number: 894345 — LEVEL EEI

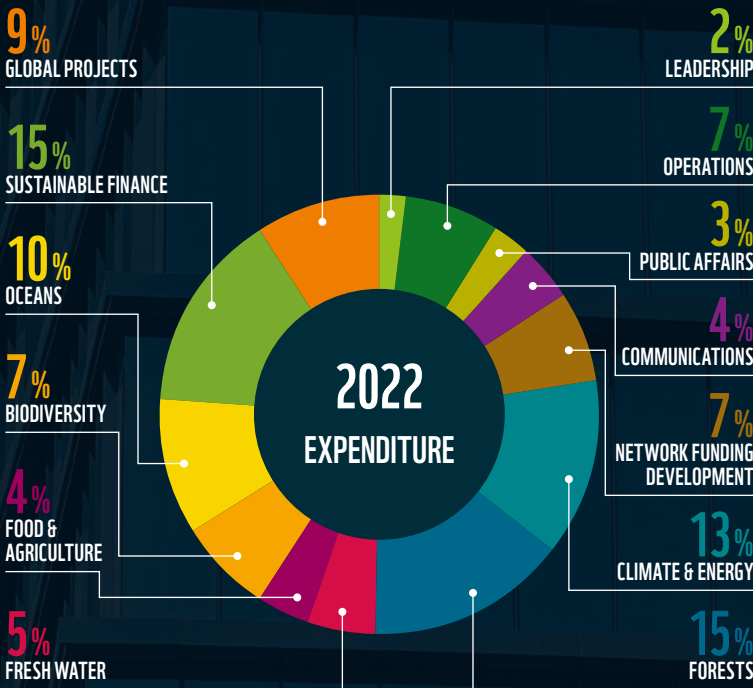
# OUR BUDGET

## INCOME AND EXPENDITURE 2022

TOTAL INCOME	€ 5,326,604	
WWF Network	€ 2,754,107	52%
Trusts & Foundations	€ 1,387,306	26%
European Union & Public Sector Partnership (PSP)	€ 1,157,848	22%
Other Income	€ 27,343	1%



TOTAL EXPENDITURE	€ 5,163,619	
Leadership	€ 109,234	2%
Operations	€ 375,751	7%
Public Affairs	€ 151,123	3%
Communications	€ 196,352	4%
Network Funding Development	€ 359,615	7%
Climate & Energy	€ 670,522	13%
Forests	€ 769,485	15%
Fresh Water	€ 235,170	5%
Food & Agriculture	€ 208,545	4%
Biodiversity	€ 350,824	7%
Oceans	€ 495,588	10%
Sustainable Finance	€ 762,043	15%
Global Projects	€ 479,368	9%





# THE WWF EUROPEAN POLICY OFFICE TEAM\*

\* as of 31 January 2023



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**Diana Rubini**  
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The WWF European Policy Office is made up of a truly international team representing 16 nationalities, with expertise ranging from biology to finance, from forestry to communications, from political sciences to accounting.

We are united in our passion and dedication to help take Europe firmly on a path to environmental sustainability.



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WWF is an independent conservation organisation, with more than 38 million followers and a global network active through local leadership in over 100 countries.

Our mission is to stop the degradation of the planet's natural environment and to build a future in which people live in harmony with nature, by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

The European Policy Office contributes to the achievement of WWF's global mission by leading the WWF network to shape EU policies impacting on the European and global environment.

Layout: bitter grafik, Hamburg

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Front cover:

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**OUR MISSION IS  
TO STOP THE DEGRADATION  
OF THE PLANET'S NATURAL  
ENVIRONMENT AND TO BUILD  
A FUTURE IN WHICH  
PEOPLE LIVE IN HARMONY  
WITH NATURE.**



Working to sustain the natural  
world for the benefit of people  
and wildlife.

**together possible™**

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