



Budapest and Tilburg, 10/02/2017

Dear European Commission,

CEEweb for Biodiversity and Eurositere, representing members of both networks would like to thank you for the opportunity to comment on the proposed Action Plan to better implement Natura 2000.

As the Fitness Check document concluded, the Birds and Habitats Directives are fit for purpose; however they work best where well implemented. This is why we need bold actions both at the EU level as well as in the individual Member States to increase implementation of the directives. We believe that the Action Plan can be a great tool for this if the actions are well targeted, smartly planned and supported by all stakeholders.

The following amendments are recommended:

1. Diagnosis

- a. The Diagnosis is based on the Staff Working Document published by the European Commission, however, it has some discrepancies in comparison to the emerging findings by the consortium led by Milieu, e.g. the existence of subsidies harmful-for-biodiversity as a hindering factor, agriculture identified as the main pressure for biodiversity, and costs of inaction in relation to jobs are all not mentioned in the Staff Working Document. Question 6.3.4 (R.4) does not include the information that European citizens do not see a conflict between nature and economy and perceive both as equally important. Question 6.3.5. (R.5) excludes the information that citizens want to have more Protected Areas, stricter rules and more action from EU and national governments.
- b. The Action Plan (AP) should comprise activities that are linked to the achievement of other strategies and policies e.g. the EU Biodiversity Strategy 2020, in particular target 1, 2 and 3, as well as the Common Agricultural Policy, in particular more positive actions towards saving agricultural habitats already now and not after the reform in 2020.
- c. The diagnosis should clearly state that the text of the Directives does not need to be changed.
- d. The diagnosis should include the major threats hampering management of the network i.e. lack of financing, lack of political will to properly implement the directives, lack of management plans, and lack of coherence between policies.

2. Therapy

- a. The level of ambition of the actions should be raised, especially in regard to

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agriculture, financing, achieving the aims of the EU Biodiversity Strategy 2020 as well as assigning specific actions to the Member States.

- b. The Action Plan should clearly describe the process of approving it, indicate who will take the responsibility of implementing it and who is targeted by its actions.
 - c. In point 3: "Strengthening investment in Natura 2000 and coherence with other policies", actions should strengthen the effectiveness of the investment for Natura 2000 and the realization of biodiversity and sustainability proofing of all the EU funds. Regarding the coherence, the focus should be put on the other sectorial policies that should be coherent with the Birds and Habitats Directives.
 - d. As another way to invest in Natura 2000, development of compensation mechanisms that would allow to limit human activities and ecosystems use should be added.
3. Suggestions for actions
- a. Additional documents should be added: Milieu, IEEP and ICF, Evaluation Study to support the Fitness Check of the Birds and Habitats Directives, March 2016; and European Court Of Auditors (2014) 'Is the ERDF effective in funding projects that directly promote biodiversity under the EU biodiversity strategy to 2020?', .doi: 10.2865/41174.
4. Smarter implementation
- a. While updating / developing new guidelines, European Commission should also work on Natura 2000 species management guidances.
5. Stepping up implementation
- a. One of the actions should be to finalize the designation of the Natura 2000 network, covering existing gaps in terrestrial and marine sites.
 - b. The European Commission should develop an inspection system to check on how Member States are doing in regard to management of the network e.g. by the means of sites biodiversity studies, analysis of management plans, remote sensing, deeper and more advanced case studies and scientific proofs, identifying drivers of local biodiversity loss and the reasons of non-favourable species and habitats status, are necessary.
 - c. Infringement procedure should be made more effectively and quicker to prevent destruction of biodiversity, also in smaller cases.
 - d. Better integration of Mapping and Assessment of Ecosystem Services into national policies and implementation should be one of the actions.
 - e. The Pollinators Initiative should become a specific part of the Action Plan, not only to be considered.
 - f. Methodology for habitats and species that are most threatened and are therefore a

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priority for conservation action should be established and promoted at EU or biogeographical regions level.

- g. Natural processes and nature-based approaches including rewilding and non intervention management, should be more considered as one of the potential site management tools and should be used where appropriate. Such approach should be more emphasized in the Action Plan.
6. Better funding and integration
 - a. A statement that the next Multiannual Financial Framework should have larger share for funding Natura 2000 both through the LIFE instrument and within the integrated approach should be incorporated into the Action Plan.
 - b. All EU funds have to undergo sustainability / biodiversity proofing e.g. through SEA procedures to make sure they are coherent with Priority Action Frameworks (PAF) and other policies, and will not damage the environment. All funding policies should be coherent with each other.
 - c. An immediate action should be to stop all the incentives that are harmful for biodiversity e.g. some of the greening measures under Pillar 1 of the Common Agricultural Policy.
 - d. More financial resources should be devoted to nature protection already in this financing period. The European Commission should ask for emergency funding. The Consultant's report clearly stated that the financing of Natura 2000 is not adequate to the needs of effective management and it is a major obstacle for proper implementation of the directives.
 - e. Similarly as with the Pollinators Initiative, TEN-G should be not only considered but established and effectively implemented.
 - f. Integration of other policies with the Birds and Habitats Directives should be a priority both on EU and national levels.
 7. More knowledge, engagement and awareness
 - a. One of the actions should be to raise awareness of Natura 2000 socio-economic benefits among different sectors e.g. health, agriculture, business.
 - b. For better engagement, European Union publications should be translated into national languages.
 - c. The European Commission should encourage Member States to establish management plans for all sites. Set standards that are already used and can be adapted to Natura 2000 e.g. Green List of IUCN or an EU-wide software for management planning that would link to the Natura 2000 database and help to draw up plans with measures to secure favourable conservation status for the habitats and species relevant to the site. Ecological factors of sites integrity and

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natural ecosystem dynamics should be fully taken into consideration in sites management planning.

- d. The European Commission should promote research that compiles cost-benefit analysis of grey infrastructure and green-blue infrastructure.
 - e. The European Commission should develop a system of early recognition of poorly managed sites, and put in place effective procedures of improvement and enforcement.
 - f. The European Commission should develop a system for monitoring that will be unified between Member States, encourage Member States to store the data in sharable and comparable format and develop a tracking tool to measure progress in management of the sites.
8. Implementation of the Action Plan
- a. The Action Plan should clearly state who will propose actions and who will implement them.
 - b. It should also be specified how the Action Plan will relate to the EU Biodiversity Strategy 2020.

Our submission can be made public.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Zolyomi Agnes'.

Agnes Zolyomi, CEEweb for Biodiversity

A handwritten signature in blue ink, appearing to read 'Stefan Versweyveld'.

Stefan Versweyveld, Eurosite

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