

**Briefing to the EU Nature Directors from the European Habitats
Forum
November 2007**

1. Strategy Beyond 2010?

The European Habitats Forum (EHF) members welcome this discussion on a strategy for biodiversity beyond 2010 and recommend that the EU develops a future vision for biodiversity that is ambitious, far reaching and inspirational. We believe that such a vision should:

- Recognise that nature and biodiversity should be rich, diverse and abundant
- Emphasise the intrinsic value of biodiversity
- Communicate the need for healthy, functioning and resilient ecosystems and the benefits of this to society and the economy
- Include the need for restoration of biodiversity where it has been lost
- Recognise that biodiversity and the natural environment puts limits on economic growth and a green economy is needed
- Recognise that an environment rich in biodiversity contributes to healthy, happy and fulfilling lives for EU citizens.

Alongside the development of an easily communicated future vision for biodiversity, the EHF recommends that the EU adopts a new political target to replace the 2010 goal. This needs to be easy to measure and communicate, and more positive than simply “halting biodiversity loss”. Such a goal also needs high-level agreement from the EU Heads of State to ensure that biodiversity is kept on the EU’s political agenda, for example, it could be adopted as a key goal of the EU Sustainable Development Strategy.

We believe that the European Commission and Member States have already made great strides in setting out a comprehensive list of the key actions needed to save biodiversity in the 2006 Biodiversity Communication and 2010 Action Plan. We encourage the European Commission to use the development of a post 2010 strategy to enhance the implementation of the objectives and actions of this existing strategy rather than diverting time, effort and resources towards developing a new one.



2. Impacts of the use of Renewable Energies on the objectives of the Birds and Habitats Directives

Whilst we welcome the development of renewable energies, we are concerned that the EU, through its energy policy for Europe is focusing on climate change mitigation without taking proper account of the impacts on biodiversity loss. This ignores the fact that climate change is a symptom of wider environmental degradation, and should not be tackled through isolated ‘quick fix’ technical responses which further aggravate biodiversity loss. We therefore urge the European Commission and Nature Directors to push for holistic and strategic approaches in the development of renewable energies so that negative impacts on biodiversity are avoided, rather than leaving these to be addressed at a late stage in the process.

Biofuels

The EU is currently pursuing a fivefold increase in the use of biofuels which will require the importation of feedstock and biofuels of up to 85%, with associated potentially significant sustainability risks, both inside the EU (mainly from agriculture intensification) and in tropical countries (mainly through habitat clearance). Such risks have not been sufficiently investigated and quantified and proposed environmental and social safeguards are unlikely to be functioning effectively in the near future. We ask for the following fundamental approaches to be followed:

- Any biofuels counting toward EU targets or enjoying public support should be produced according to strict sustainability standards delivered by an EU agreed certification system. Such a system should, among other things, safeguard biodiversity priorities, such as Natura 2000 protected areas and other High Conservation Value Areas. We recommend that the EU builds on the work of Member States who are developing sustainability criteria, as well as on the work carried by the Roundtable on Sustainable Biofuels (RSB).
- Even the best sustainability certification scheme cannot give full guarantee against major biodiversity impacts being caused by displacement and leakage effects (i.e. sustainable production displacing other agricultural activities that then encroach on natural habitats). To deal with this problem, a second “safeguard layer” should be introduced by promoting the regular monitoring of the global impact of the EU biofuels policy and requiring targets and measures to be reviewed as soon as major negative impacts are detected.
- Unlike most current biofuels, many other biomass technologies do offer very substantial GHG emission reduction potential (over their entire life cycle). These range from biogas, to combined heat and power production from small scale installation to so called “second generation” lingo-cellulosic biofuels. Research and experimentation should be promoted into such technologies, with a particular attention to win-win solutions where energy production can be combined with habitat management and restoration or with improvement of environmental quality. Clear guidelines and incentives should be developed for the deployment of biomass technologies so that impacts can be minimised while benefit maximised.

Wind farms

Currently, Europe is experiencing record growth in the planning and installation of wind farms as one of the measures to mitigate the impacts of climate change and develop more sustainable sources of energy. Some wind farms are being constructed in a piecemeal fashion, without undergoing rigorous strategic assessment and planning processes with regards to their potential impact on natural habitats and wildlife. Birds and bats are especially sensitive to the various adverse impacts posed by such installations (e.g. through collision, disturbance, barriers to movements and habitat loss). We insist that the following principles must be followed when planning wind farms to minimise their impact on protected wildlife and their habitats:

- Wind farms must be located, designed and managed so that there are no significant adverse impacts on animals, particularly birds and bats or their habitats. There should be, as much as possible, precautionary avoidance of locating wind farms within and near Natura 2000 sites, other statutory protected areas and areas identified as of international importance to birds (IBAs) or other species of animals sensitive to the adverse impacts of these installations.
- National, regional and local governments must undertake Strategic Environmental Assessments (SEA) of all wind energy plans and programmes that have the potential for significant environmental effects. (Strategic) Appropriate Assessments (AA), in accordance with the requirements of Article 6 of the Habitats Directive must be carried out for all wind energy plans or programmes if it cannot be excluded, on the basis of objective information, that the plan or programme will have a significant effect¹ on a Natura 2000 site.
- There is a need to conduct Environmental Impact Assessments and/or Appropriate Assessments on individual wind farm projects to assess and minimise their potential impact on valuable natural sites and protected areas mentioned above. Such assessments should consider the cumulative impact of all projects in a particular area or region that might have a negative impact on these sites.
- Independent rigorous research and monitoring should be implemented, funded by national governments and the wind energy industry, in consultation with relevant experts, to improve our understanding of the impacts of wind farms on nature conservation. Special attention needs to be given to offshore wind farms and along migration flyways of birds and bats.

3. Biodiversity and Climate Change with particular reference to Natura 2000

The Birds and Habitats Directives and Natura 2000 network are the cornerstones of EU biodiversity policy. As biodiversity loss is exacerbated even further by climate change, the need for this nature legislation will only increase.

The Directives protect an important number of ecosystems which can greatly assist in climate change adaptation and associated social, economic and environment. These services include: preventing desertification; absorbing water from excess flooding and

¹ The meaning of “significant effect” is clarified in the Judgement C-127/02 (“Wadden Sea ruling”, European Commission vs. The Netherlands) as an effect that is likely to undermine the site’s conservation objectives.

rising sea levels; resisting forest fires; decreasing the number of species extinctions; controlling the microclimate of cities; and ensuring a greater genetic diversity of agricultural crops and fisheries stocks. We recommend that the EU highlights this critical role played by the Directives and the Natura 2000 network within the EU's paper on Climate Change Adaptation, and urge them to take an ecosystem approach in the development of EU climate change adaptation policies.

We believe that the Birds and Habitats Directives provide adequate and flexible tools to maintain the EU's protected species and habitats in a favourable conservation status. We urge the Nature Directors to use all the tools and measures offered by the Directives, including the maintenance and restoration of habitats outside the Natura 2000 network, compensation for potential loss of habitats due to climate change, strengthening network coherence and connectivity and targeted species conservation projects. Setting clear targets (Favourable Reference Values) and monitoring species populations and habitats within and outside the Natura 2000 network are also crucial activities in support of adaptation.

4. Governance

The EHF actively participates in a range of EU fora and working groups, for example, the Habitats and Ornis Committees Scientific Working Groups, the biogeographic seminars, and the Biodiversity Experts Group, and brings a wide range of expertise on nature conservation issues. We would like to recommend that any changes to governance structures ensure the following:

- A separation between technical/scientific discussions and political ones to ensure independent/unbiased opinions are reached on scientific issues
- An interactive structure to stimulate fruitful discussions, with the agenda and background papers circulated well in advance (ideally, at least one month before the meetings)
- Full participation of NGO's to enable exchanges of information and expertise.

Additionally, we would recommend that participatory processes (such as biogeographic seminars or equivalent) are established to evaluate information on the designation of marine sites and the Article 17 reporting in particular, especially to ensure independent scientific verification of the determination of Favourable Reference Values for species and habitats.

Contacts for more information:

Zoltán Waliczky, EHF Chair, RSPB, The Lodge, Sandy, Bedfordshire, SG19 2DL, UK,
Tel +44 1767 680 551, E-mail zoltan.waliczky@rspb.org.uk

Andreas Baumüller, EHF Vice Chair, WWF EPO, 36 avenue de Tervuren, 1040
Brussels, Belgium, Tel +32 2 740 0921, E-mail abaumueller@wwfepo.org

Janice Weatherley, EHF Secretariat, IUCN, Boulevard Louis Schmidt 64, 1040
Brussels Belgium, Tel +32 2739 3003, E-mail janice.weatherley@iucn.org