CEEweb for Biodiversity
Kuruclesi út 11/a, 1021 Budapest, Hungary
Phone: +36 1 398 0135
Fax: +36 1 398 0136
ceeweb@ceeweb.org
www.ceeweb.org

Recommendations for the new 2020 EU Biodiversity Strategy

CEEweb welcomes the opportunity to comment the Commission's proposal for the Biodiversity Strategy put forward on the stakeholder consultation during Green Week and via the online consultation. Further to our earlier comments[1] we make some additional general recommendations as well as some proposals to single sub-targets with this paper.

General recommendations

We support the prioritised approach of the Strategy because this could potentially result in more focused EU action to halt biodiversity loss. Nevertheless most suggested sub-targets are still directed towards sectoral pressures while there is little attention given to the indirect drivers of biodiversity loss. Whilst immediate implementation of already identified conservation measures, and some new ones, is essential in the short term, it is indispensable to complement these efforts with the design and implementation of long term measures which can lead to fundamental changes in the socio-economic drivers underlying biodiversity loss. These measures should bring about the lowering of total environmental pressure to a level that stays within the global ecological carrying capacity. In this regard real progress would be the setting of a footprint target for Europe which would influence consumption and production and thus affect one of the main indirect drivers – overconsumption. Therefore in our proposal we concentrate on two sub-targets which could effectively bring about the lowering of the total environmental pressure: regulation of land use under Sub-target 4 and setting of a footprint target under Sub-target 6.

[1] Assessing the Biodiversity Action Plan and its implementation: a failure of delivery or a failure of approach? CEEweb, February 2009 http://www.ceeweb.org/workingareas/policies/docs/BAP_assessment_leaflet.pdf
Response to the Commission's Communication „Options for an EU vision and target for biodiversity beyond 2010" and recommendations for the post 2010 Biodiversity Strategy, CEEweb 2010 January http://www.ceeweb.org/workingareas/policies/CEEweb_response_post_2010.pdf

1. Contribution to Sub-target 4 (ST4): working with nature and investing in natural capital – Green Infrastructure

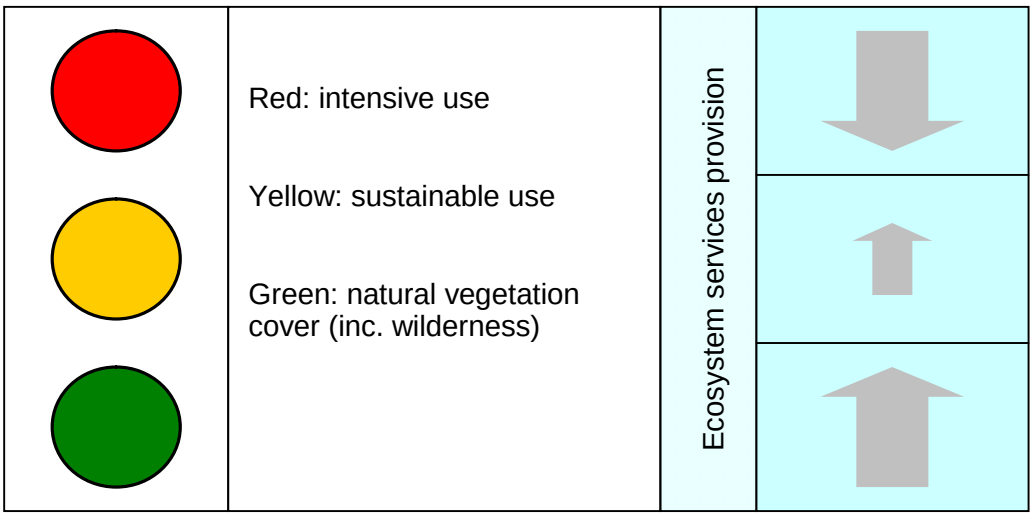
Space: one of the three attributes of environment

Besides its *qualitative* and *quantitative* attribute, the *spatial* element is the third attribute of the environment. According to this, environmental pressures can also have three main forms: pollution/ release of invasive alien species, GMOs; the use of natural resources; and the degradation of the spatial structure/loss of natural habitats. In our view, measures designed under the Green Infrastructure Sub-target should contribute to restoring the natural vegetation cover with a view to sustainable use of Europe's land resources and wherever this is possible also through "giving land back to nature".

Furthermore, there is a very strong indirect link between land use, climate change and biodiversity. GHG emissions, excessive use of natural resources and degradation of natural ecosystems are equivalently important causes of climate change. Therefore a well designed land use policy should be understood as one pillar of climate change mitigation and adaptation equally important to CO2 reduction measures.

Traffic light model of land use

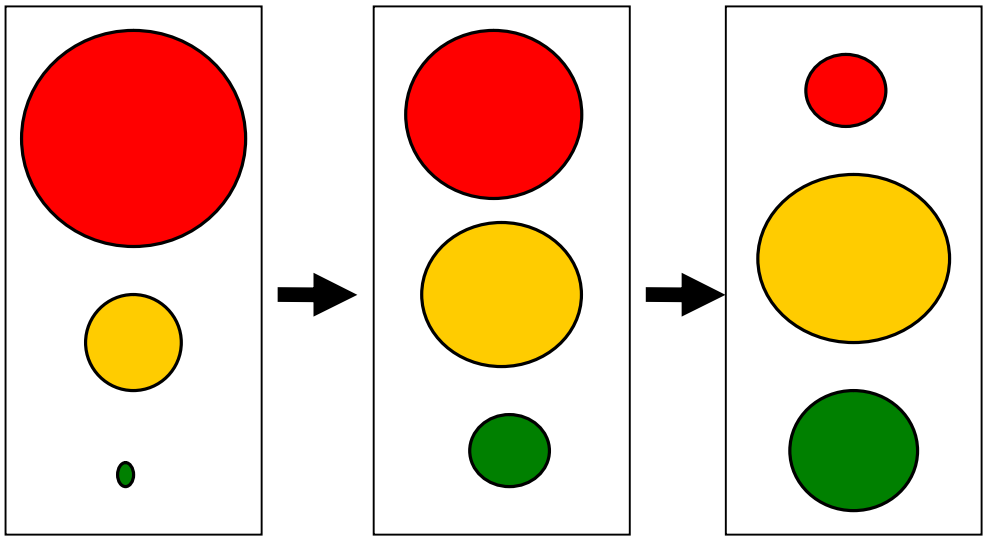
For the demonstration of our suggested sub-target and measures we use a simplified theoretic model.



The traffic light model categorizes land use in three main groups: 'Red' areas are used intensively by agriculture or belong to human settlements, transport and other man-made infrastructure. 'Yellow' are extensively used agricultural areas, pasture etc. 'Green' means areas where the natural surface cover has been conserved or is being restored by natural processes. The marginal remaining wilderness areas in the EU are included here, too. There

is a big difference in the provision of ecosystem services by the different land use forms. In the current EU policy, the yellow and green part is managed together, whereas all the negative effects are coming from the red part, whose management is not integrated in any sustainable management schemes.

The goal is to enable a gradual, stepwise shift from red to yellow, and from yellow to green so that the proportions are changed at the end. The transition could be enabled through different regulatory and incentive measures, such as voluntary schemes, lower taxes for areas in green and yellow etc. It is important that the remaining green areas are protected from 2010 onwards, while the shift from red to yellow and from yellow to red can take several years. In the first phase, rather light conditions for sustainable use of the yellow areas would be set which are easy to meet, and parallel to this, a small tax on intensive use would be made. The money coming from this tax would be used to establish the conditions for the sustainable use of the new areas entering the scheme, and to compensate for the non-use of the green areas. In a second phase, the conditions for joining yellow would become stricter, while also the tax on red would be increased. Those who join the new scheme will be more sustainable than they were in the first phase, due to the higher expectations. This system can have several phases, until the majority of land is managed in a sustainable way. It is worth for the managers to join the new schemes, which are easy to meet because the changes are slow and step-by-step.



The goal is to enable a gradual, stepwise shift from red to yellow, and from yellow to green so that the proportions of today are changed.

This theoretic model has served as a basis for a study conducted in Hungary. The study looks at the possibilities of restoring the natural surface cover as a contribution to climate change mitigation and adaptation. In practice, it is a research on the possibility to realise the traffic light model in Hungary.[2] The study proposes to withdraw 1, 5 million hectares (15% of Hungary) of agriculturally less valuable land from intensive crop production and use as forest, grassland or as protected areas (yellow and green). This would be perfectly feasible, as the domestic food demand can be satisfied on 1,7 mill hectares (or 1.3. mill hectares by vegetarian diet). The remaining areas could be used for energy production or other alternative uses. CEEweb is preparing a similar study for the EU 27 to be finalised in early 2011.

Subtarget recommendations

A shift in land use as described above can only be achieved if the proportion of different land use forms is commonly agreed upon, fixed and implemented. The enhanced implementation of already existing policy and economic measures (such as those under the CAP) or national level regulations can powerfully contribute to achieve such a shift, but are likely not sufficient alone as they can be easily offset by the overall growing pressure on land.

Therefore we propose to set overall targets for a land use shift on European level based on the simplified traffic light model. Europe has faced a tremendous pressure on land over the last 20 years and considering global future outlooks this pressure is not likely to lessen in the long run. This tendency can only be counteracted by strong overall objectives which would provide an enabling framework for all other land use and biodiversity related measures.

Instead of creating corridors, the EU should apply a complex landscape-approach, because all kind of land can serve as corridor to certain extent and for certain species. The whole landscape should become step by step more biodiversity-friendly and permeable through enlargement of the yellow and green areas. It is obvious that a mosaic-like, diverse and

[2] Magyarország felszínborítottságának lehetıségei az éghajlatvédelemben, Kohlheb Norbert, Podmaniczky László, Skutai Julianna; *KÖRTÁJ Tervező Iroda Kft., 2009.*

Based on aggregate socio- economic and biological data each 100x100 m square of the country was assessed for it's agricultural, environmental and forestry potential. According to this, it was defined which areas are most suitable for crop production; for protection or extensive use; as well as for forestry. This assessment was then compared with the current use. The results show that the best agricultural land is in fact over 90% used for farming. A less fortunate use is carried out in areas with medium farming potential: these are also used over 90% as cropland. These areas would be better used as grassland or as some kind of protected area, as crop production doesn't really make economic sense.

coherent landscape providing various connections between locations of natural habitats is the most viable, and that is how man-dominated landscapes also need to look like. In this regard, the implementation of the proposed land use model is a direct contribution to the mitigation of climate change as well as to adaptation to its effects by strengthening the resilience and adaptive capacity of ecosystems.

Recommended Sub-target 4 by 2020: Proportion of land use changed to:
Wilderness: 5%, Extensive use: 30-40%, Intensive use: 55-65%

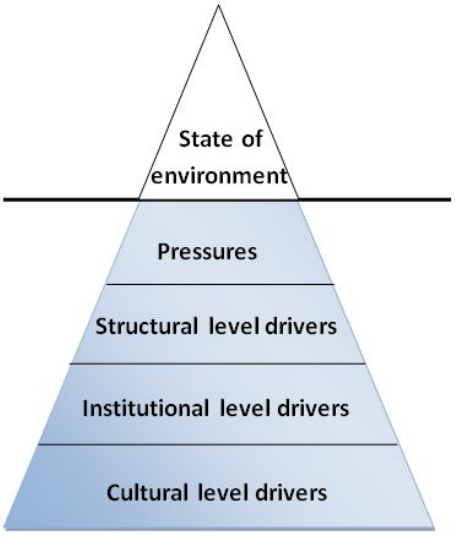
Recommended Measures for the Strategy

Active conversion: Gradual conversion of intensively used areas to extensive use by incentive measures, regulations, voluntary measures, payment for ecosystem services etc. also including active rehabilitation of sealed land, removal of unnecessary transport infrastructure and other fragmenting elements (e.g. water infrastructure), large scale rehabilitation of floodplains and wetlands; green roofs, green patches and green walls in cities, or forest belts and hedges between plough lands etc.

Natural regeneration, re-wildening: According Global Biodiversity Outlook 3, there are opportunities for re-wilding landscapes from farmland abandonment. In Europe, for example, about 200 000 square kilometers of land are expected to be freed up by 2050. Ecological restoration and reintroduction of large herbivores and carnivores will be important in creating self-sustaining ecosystems with minimal need for further human intervention. Wherever it is possible and not contradictory to conservation interest, natural processes should be given free rain to enable natural regeneration of the surface cover. This would mean less use of fossil fuel thus could be an effective contribution to climate change mitigation, too.

2. Sub-target 6 Contribution to global biodiversity ST6 – addressing the EU ecological footprint and contributing to global biodiversity efforts

Achieving the 2020 target and 2050 vision clearly requires measures that go far beyond the scope of biodiversity policy. Biodiversity loss can only be stopped if the drivers of biodiversity loss are tackled. These underlying drivers of biodiversity loss are rooted in the socio-economic framework, which is based on unlimited availability of cheap natural resources and consequent unsustainable production and consumption patterns. As long as these underlying drivers are not changed, they will keep regenerating the pressure on the environment in different forms, including pollution, habitat loss and fragmentation, overexploitation etc. The most important reason for the failure of current European and international biodiversity policies is that they focus mostly on the direct pressures and don't make an attempt to change the drivers.



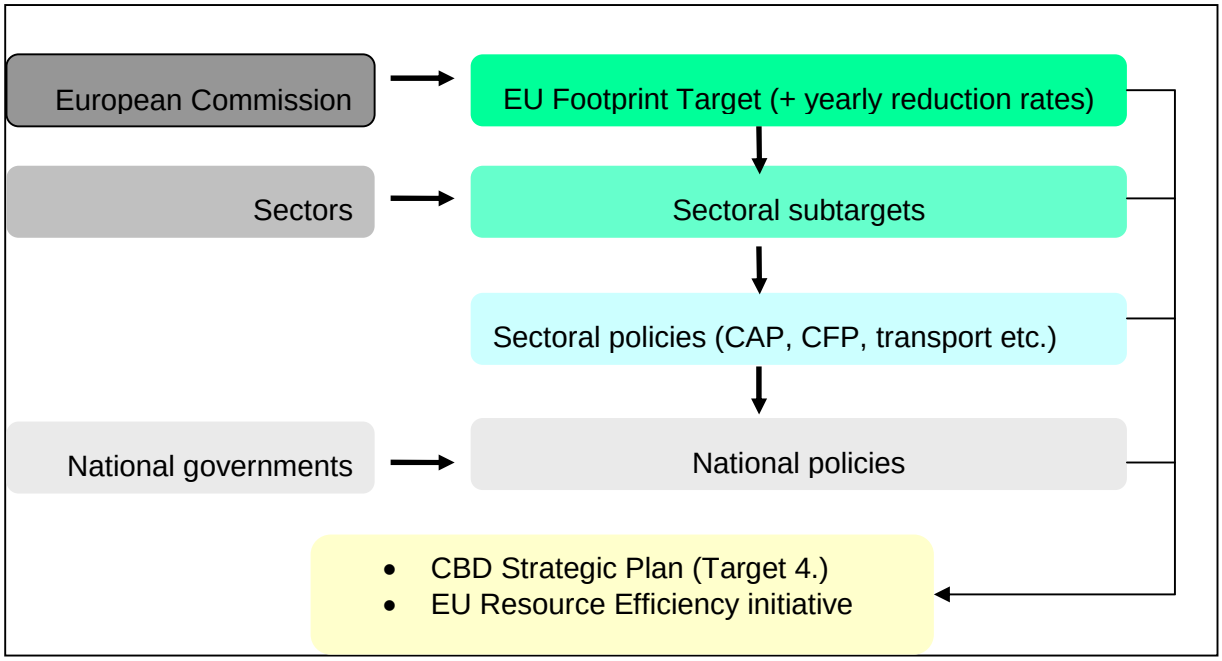
CEEweb has been continuously advocating for putting an absolute limit on the use of natural resources (fossil energy resources and other natural resources as water, land, biodiversity) as a means to tackle the underlying drivers. Setting and enforcing such limits is absolutely necessary to reach the 2020 biodiversity target and the 2050 Vision. Therefore we welcome the Commission's intention to target the European footprint and suggest setting an ambitious footprint reduction target for Europe followed up by dedicated regional, national and sectoral level targets and action to make it happen.

Applying input side regulation to the economy is the only effective way to decrease total environmental pressure. This would create the right balance between the use of natural resources and human labour in the production process, and thus contribute to achieving full employment. It would shift the production and consumption patterns towards less energy-

and material-intensive products and services, and positively change the values of society by making people appreciate natural resources more, including healthy ecosystems. As production and consumption patterns fundamentally change, the sustainable use of biodiversity, including the management of Natura 2000 sites, becomes more profitable for the land owners. Similarly, this would make a substantial contribution both to improving the coherence of ecosystems and to limiting pollution and the spread of invasive alien species and use of GMOs, by creating an enabling socio-economic environment for effective policies and legal regulation in those fields.

Tackling environmental problems on the level of drivers helps to avoid shifting of pressure, which is often the unwanted consequence of environmental policies. In the case of biofuels the pressure was shifted from air pollution to spatial loss of biodiversity rich habitats. Setting a footprint target could help limit the use of different resources at the same time and provide a measurement for our overall consumption thus help avoid the shifting of pressure. Compared to CO2 targets, footprint targets represent input-side regulation, which is the only effective way of controlling the use of resources. Setting an overall cap on resource use would possibly be the most important step towards the transformation of the economy to a sustainable market economy, a Green Economy.

The implementation of an EU footprint target (if set) will be likely supported by similar objectives included in the new Strategic Plan of the CBD (Strategic Goal A, Target 1-4) as well as by a possible 7th Environmental Action Programme (7th EAP). Efforts under the formulating Resource Efficiency Initiative under the EU 2020 Strategy can also contribute to an overall reduced European footprint and vice versa.



Different levels and stakeholders involved in the definition and implementation of footprint targets

We believe setting overall footprint target in the EU Biodiversity Strategy could be the right strategy because the term is relatively well known and easily understandable to everyone. The methodological difficulties connected to the measurement of the ecological footprint might be overcome in a later stage through using the alternative methodology developed by Friends of the Earth Europe[3]. It is important that the measurement of the footprint has to include all resources that are used in Europe (either imported or extracted domestically), to counteract the exporting of environmental pressures.

Suggested Sub-target 6
Reduce the EU ecological footprint by 50% until 2020 (by yearly reduction of 5%)

Recommended Measures for the Strategy

Footprint targets and resource caps on different levels (global, EU regional national and sectoral); tradable resource use quotas (similar to CO2 quotas); revolving fund to finance investments for a transition to low-carbon-low-resource economy.

Contact: Veronika Kiss, Secretary General

kiss@ceeweb.org, T: +36 1 398 01 35

CEEweb for Biodiversity Széher út 40, 1021 Budapest Hungary

CEEweb for Biodiversity is a network of non-governmental organizations in the Central and Eastern European region. Our mission is the conservation of biodiversity through the promotion of sustainable development.

[3] Measuring our resource use - A vital tool in creating a resource-efficient EU http://www.foe.co.uk/resource/briefings/measuring_resource_use.pdf and How to measure Europe's resource use An analysis for Friends of the Earth Europe http://www.foe.co.uk/resource/reports/measuring_resource_use.pdf