To
Frans Timmermans
Executive Vice-President of the European Commission
European Green Deal

Virginijus Sinkevičius,
Commissioner for Environment, Oceans and Fisheries

Rue de la Loi / Wetstraat 200
1000 Brussels

Subject: EU Nature Restoration Law

14 December 2021

Dear Vice-President Timmermans, Dear Commissioner Sinkevičius,

We are writing to you to raise our concerns regarding the overall ambition of the EU Nature Restoration Law (NRL) which is in the final stages of preparation by the European Commission. We are strongly convinced that clear, measurable targets for land area, river length and sea area are the key elements to make this legislation as ambitious, fit-for-purpose, and effective as possible. These measurable targets should reflect the level of political priority given to this file through the European Green Deal. EU biodiversity is in a terrible state and the NRL can offer solutions to the interlinked climate and biodiversity crises.

A proposal based on targets formulated as a percentage of “degraded area”, based on Member States’ assessments as part of their Article 17 reporting obligations under the EU Habitats Directive would be insufficient. As it stands, the reporting of Member States is not comprehensive, has many data gaps (with the condition of significant percentages of habitats and species listed as “unknown”) and therefore, underestimates the restoration efforts needed to put biodiversity on a path to recovery by 2030. As it stands, it leaves room for interpretation and inaction, as it is unclear how much land, river length and sea area would need to be restored and to what degree.

Therefore, we are strongly convinced that only numerical targets referring to the whole EU land area, river length and sea area can provide a real drive for biodiversity and climate, and create legal certainty for speedy and effective implementation. Just as with the EU Climate Law, a robust and understandable EU headline target that overarches the individual ecosystems (and species) specific targets is indispensable in order to mobilise Member States’ action at the required scale and helps bring civil society on board. Additionally, it can facilitate the monitoring of individual Member States’ contributions, thus ensuring the timely achievement of the EU-wide targets.

As NGOs, we advocate for a target to restore at least 15% of the EU land and sea area, as well as river length by 2030, to which all underlying ecosystem specific targets should contribute. That would mean restoring 650,000km$^2$ of land, 1,000,000km$^2$ of marine EU area and 178,000km of rivers.
Adding such clear and meaningful overall targets as a specific article in the proposed new law would express the political commitment that you have powerfully and repeatedly articulated in your speeches in various instances and fora.

We hope that your decisions in the final consultations on the NRL will put Europe on a path of nature recovery which is in the interest of all European citizens and future generations.

Thank you for taking our recommendations into account in your deliberations.

Yours sincerely,

Undersigned organisations:
Youth and Environment Europe
GRÜNE LIGA e.V.
Buglife - The Invertebrate Conservation Trust
Rewilding Europe
Irish Whale and Dolphin Group
Opolskie Towarzystwo Przyrodnicze (Naturalist Society of Opole Voivodeship)
Eurosite - the European Land Conservation Network
Polish Ecological Club
Croatian Society for Birds and Nature Protection
Iceland Nature Conservation Association
Lega Italiana Protezione Uccelli (LIPU)
CIPRA Italy
Brod Ecological Society-BED (Croatia)
Stowarzyszenie Ekologiczne EKO-UNIA, Poland
International Mire Conservation Group
Cork Nature Network
Macroom District Environmental Group
European Anglers Alliance natur&emwelt a.s.b.l
Societas Europaea Herpetologica (SEH)
FAPAS - Associação Portuguesa para a Conservação da Biodiversidade
Sciaena
Fundacja Strefa Zieleni
Steppnicka Organizacja Turystyczna
Latvijas Ornitolōģijas biedrība
BirdLife Cyprus Irish Wildlife Trust