



**Pasaules
Dabas
Fonds**

sadarbībā ar



19. 05. 2011.

Latvijas Republikas
Vides un Reģionālās attīstības ministrijai
Peldu iela 25, Rīga
LV - 1494

par Eiropas Savienības secinājumu projektu par Bioloģiskās daudzveidības stratēģiju

Latvijas Dabas fonds, Lātvijas Ornitoloģijas biedrība un Pasaules Dabas fonds ir saņēmis un iepazīsies ar Eiropas Savienības (turpmāk tekstā – ES) secinājumu projektu (10.05.2011. DS 1306/11) par Bioloģiskās daudzveidības stratēģiju (03.05.2011 COM(2011) 244 *final*).

Novērtējot secinājumu projekta pro-aktīvo un pozitīvo attieksmi bioloģiskās daudzveidības uzturēšanas un saglabāšanas nodrošināšanai, iesakām veikt šādus labojumus un papildinājumus:

- 1) Izteikt 4. punktu šādā redakcijā: *„Endorses the EU Biodiversity Strategy to 2020 and its targets and actions but stresses that they might not be sufficient to reach the overall 2020 headline target. Therefore the mid-term review of the Strategy should, if overall trends of species and habitats continue to be negative by 2014, include Commission proposals for more ambitious action and targets for the second half of the decade.”*;
- 2) papildināt ar 18. punktu, izvietojot to pēc konteksta *„Recognises the need for development of an effective and functioning „green infrastructure” to improve connectivity among Natura2000 sites as well ensure protection of all species and habitats protected under the Habitats Directive”*;
- 3) papildināt ar 19. punktu, izvietojot to pēc konteksta *„Ensure and improve conservation status of all species and habitats under the Habitats Directive in Natura2000 sites as well as outside the Natura2000 framework”*;

- 4) ņemt vērā Eiropas Vides biroja, kura aktīvs loceklis ir Latvijas Dabas fonds, izstrādātos ieteikumus (1. Pielikums) Bioloģiskās daudzveidības stratēģijas redakcijas un ieviešanas uzlabošanā.

Pielikumā:

- 1) Eiropas Vides biroja sagatavotie ieteikumi, angļu valodā uz 3 lpp.

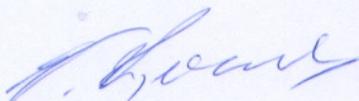
Ar cieņu,

Latvijas Dabas fonda valde



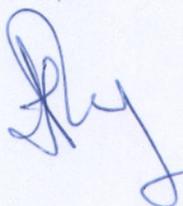
Ģirts Strazdiņš

Latvijas Ornitoloģijas biedrības
valdes priekšsēdētājs



Viesturs Ķerus

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EEB recommendations on the new EU Biodiversity Strategy¹

Recommendations for the Council Working Party on the Environment discussion on 10th May 2011

Prepared: 6th May 2011

EEB has analysed the Strategy and believes that:

1. In general, the Strategy's targets and measures **do not represent an ambitious agenda** which would put Europe on track to meet the political commitments made by Heads of States for 2020 and 2050 (Biodiversity Headline Target and Vision). Targets and actions are often too vague without a timeframe or clear measurable goal included.
2. EEB calls European member States to adopt the Strategy and start to implement it as a **necessary minimum** to halt the loss of biodiversity. Furthermore EEB asks the Council to call for **improvements** in the areas as outlined below.
3. To ensure coherence and delivery, we call the **Agricultural and Fisheries Council to adopt Target 3 and 4** of the Strategy in its upcoming meeting.

Recommendations.

Target 1

To halt the deterioration in the status of all species and habitats covered by EU nature legislation and achieve a significant and measurable improvement in their status so that, by 2020, compared to current assessments: (i) 100% more habitat assessments and 50% more species assessments under the Habitats Directive show an improved conservation status; and (ii) 50% more species assessments under the Birds Directive show a secure or improved status.

The Council should:

- call the Commission to step up ambition under Target 1 so that it aims for an improved conservation status for all habitats and species protected under the Habitats Directive, not just a part of them. The target as it is now could result in critically low ambition for certain (important) groups of habitats and species with corresponding low level of action and financing dedicated to those. This could lead to misunderstanding and hamper the implementation of the Habitats Directive.
- strongly endorse the aim to complete Natura 2000 designation, including in the marine environment, by 2012 (Action 1 a).

¹ Our life insurance, our natural capital: an EU biodiversity strategy to 2020, COM(2011) 244 final

- introduce a deadline of 2015 for the completion of management plans or equivalent instruments for all designated sites under the Birds and Habitats Directives. (Action 1 c)).
- call for multi-annual planning for Natura 2000 (prioritised action frameworks), as the instrument to ensure adequate contribution from different EU funding lines and national funding. We strongly believe this would be an essential improvement for the whole of the EU necessary to meet the financing needs of Natura 2000.
- call for a clear reference to the multi-annual Natura 2000 planning documents (prioritised action frameworks) in funding regulations for different EU funding lines,
- stress the need to significantly increase budget and role of the LIFE programme for funding Natura 2000 and biodiversity,

Target 3

3A) Agriculture: By 2020, maximise areas under agriculture across grasslands, arable land and permanent crops that are covered by biodiversity-related measures under the CAP so as to ensure the conservation of biodiversity and to bring about a measurable improvement() in the conservation status of species and habitats that depend on or are affected by agriculture and in the provision of ecosystem services as compared to the EU2010 Baseline, thus contributing to enhance sustainable management.*

The target on agriculture is not acceptable as it is not clear and measurable. Besides, it is bound to Target 1, which is not ambitious enough (see above). As agriculture related habitats and species are doing in average worse than habitats and species in general², the level of ambition for improving agricultural biodiversity should be set higher.

The Council should:

- call for a measurable target for agriculture. As a minimum, a concrete target of 60% of EU farmland to be covered by specific biodiversity conservation scheme is essential.
- call the Commission to not only consider but to include the Water Framework Directive under cross compliance from 2013 onwards. Diffuse pollution from agriculture is reported to be a problem in >90% of river basins hindering the achievement of goals under the Water Framework Directive (WFD) and the Birds and Habitats Directives. The argument that the WFD is not yet implemented is false. Some member states are indeed late with implementing the Directive but are involved in legal proceedings because of this. CAP should not be synchronised with MS that are breaching the WFD but with those who are in time. (Action 8 b)).

² habitat types linked to agriculture generally have a worse conservation status, with only 7% of assessments being favourable, compared to 21 % for 'non-agricultural' habitats (REPORT FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT Composite Report on the Conservation Status of Habitat Types and Species as required under Article 17 of the Habitats Directive, page 10.)

*B) Forests: By 2020, Forest Management Plans or equivalent instruments, in line with Sustainable Forest Management (SFM)³⁰, are in place for all forests that are publicly owned and for forest holdings above a certain size** (to be defined by the Member States or regions and communicated in their Rural Development Programmes) that receive funding under the EU Rural Development Policy so as to bring about a measurable improvement(*) in the conservation status of species and habitats that depend on or are affected by forestry and in the provision of related ecosystem services as compared to the EU 2010 Baseline.*

- The ambition for forestry is too low, because forestry management plans in themselves are often not designed to ensure biodiversity protection. The Council should call the Commission to modify Action 12 so as to ensure that forest management plans or equivalent instruments include biodiversity-relevant measures on an obligatory basis. (Action 12)
- The Council should call for the promotion and protection of wilderness not just in forest but all habitat types and for increasing the share of wilderness in Europe. The lack of ambition as regarding protection of wilderness has diminished which is a regretful step back compared to the ambitious wilderness initiative started by the Commission in recent years.

Target 6

By 2020, the EU has stepped up its contribution to averting global biodiversity loss.

- The Commission fails again to set out clearly how it intends to phase out environmentally harmful subsidies, despite an ongoing commitment since 2001. Therefore the Council should ask the Commission to come up with a clear action plan and timetable for this issue. (Action 17c)

Contact

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