

# EU Biodiversity Strategy for 2030

## *The EU for an ambitious global biodiversity agenda*

Conservation International (CI) welcomes the communication on the EU Biodiversity Strategy for 2030 “Bringing nature back into our lives”<sup>1</sup>, which provides a comprehensive overview of the needed actions to tackle biodiversity loss both at the EU and global levels. It is an encouraging signal that the European Union will continue prioritizing the Green Deal and pushing for global ambition for biodiversity.

Biodiversity has never been under greater threat from human-caused pressures. The latest global assessment by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) shows that nature is declining globally at rates unprecedented in human history, with around one million species now threatened with extinction.

Natural ecosystems are essential to human survival. They provide us with food, medicine, clean air and fresh water, protection against natural disasters, and contribute to climate mitigation and adaptation. Nature based solutions can deliver over 30% of the GHG emissions reductions required by 2030 to keep global warming below 2 degrees and do so cost-effectively.<sup>2</sup>

Although the EU must protect and restore its own biodiversity, the vast majority of crucial ecosystems is found outside of its borders: tropical terrestrial, marine and freshwater ecosystems contain more than 75% of all species. And this biodiversity is crucial for us all: a recent study<sup>3</sup> showed that, globally, ecosystems contain at least 260 Gt irrecoverable carbon – meaning carbon manageable through human action that, if lost, could not be recovered by 2050 – most of it outside of the EU. This represents more than double our remaining carbon budget to meet the 1.5° target of the Paris Agreement.

The COVID-19 outbreak also shows that degrading nature endangers people, regardless of where they live. Deforestation and other land use changes are the number one cause of virus spillover from wild animals to people.<sup>4</sup>

Global biodiversity is, however, greatly impacted by policymaking and decisions taken within the EU, relating to global trade and imports of products produced elsewhere. For example, 10% of global deforestation is directly related to the EU consumption.<sup>5</sup>

Therefore, the EU has a responsibility to: 1) drive global ambition on the post-2020 biodiversity framework; 2) reduce negative impacts on biodiversity of its consumption patterns; 3) support partner countries in protecting and sustainably managing their biodiversity and. Indeed, while the proposed 2030 strategy lays out ambitious commitments on the domestic EU biodiversity, the EU has a key role to play to support partner countries in aiming to similar level of ambition.

<sup>1</sup> [https://ec.europa.eu/info/sites/info/files/communication-annex-eu-biodiversity-strategy-2030\\_en.pdf](https://ec.europa.eu/info/sites/info/files/communication-annex-eu-biodiversity-strategy-2030_en.pdf)

<sup>2</sup> <https://www.pnas.org/content/114/44/11645.full>

<sup>3</sup> [https://www.nature.com/articles/s41558-020-0738-8.epdf?author\\_access\\_token=poj3Fn4fkhP7\\_SK-yFKaTNRgN0iAjWel9jnR3ZoTv0OGVcM5jAVKvW5Gyld6F2q0ve6uY5HIQ2nGzEyTtPTSUluTOykc5x3bM9HdnsqyTZdAL\\_YY02dyngC4HUYA6LegalA-r26jCXcX1eABw5d\\_FQ%3D%3D](https://www.nature.com/articles/s41558-020-0738-8.epdf?author_access_token=poj3Fn4fkhP7_SK-yFKaTNRgN0iAjWel9jnR3ZoTv0OGVcM5jAVKvW5Gyld6F2q0ve6uY5HIQ2nGzEyTtPTSUluTOykc5x3bM9HdnsqyTZdAL_YY02dyngC4HUYA6LegalA-r26jCXcX1eABw5d_FQ%3D%3D)

<sup>4</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5960580/> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7095142/> <https://www.nature.com/articles/s41467-017-00923-8>

<sup>5</sup> [https://ec.europa.eu/info/sites/info/files/communication-eu-action-protect-restore-forests\\_en.pdf](https://ec.europa.eu/info/sites/info/files/communication-eu-action-protect-restore-forests_en.pdf)

CI provides in this document a set of recommendations to support the implementation of the global component of the EU Biodiversity Strategy for 2030 – “*The European union for an ambitious global biodiversity agenda*”.

## Raising the level of ambition and commitment worldwide

CI welcomes the ambition of the Commission and the proposed elements that it aims to spur at the global level. Conservation and restoration efforts must prioritize both marine and terrestrial (including freshwater) areas, which are ecologically intact, as well as those that deliver ecosystem services essential to meet global goals on biodiversity, climate and sustainable development.

The following core elements should be included as milestones towards a thriving planet where we are living in harmony with nature by 2050:

- **New targets to protect, conserve, and restore nature:** as a priority, the EU should encourage its partners to align with its objective to effectively protect and conserve at least 30 percent of both land and sea by 2030, including through protected areas and indigenous and community-led approaches. These cannot be just any places on the planet.
- **New targets on sustainability:** protection, conservation, and restoration are critical but need to be accompanied by action to tackle the root causes of biodiversity loss. This includes halting the conversion of natural habitats and significantly reducing the negative ecological footprint of our production and consumption in agriculture, fishing, forestry, extractive industries, and infrastructure sectors by 2030.
- **New targets on biodiversity finance:** sufficient public and private financing must be redirected and mobilized for the conservation and recovery of biodiversity, including for the effective long-term management and local governance of protected and conserved areas. This needs to be supported by economic decision-making that incorporates biodiversity, the transformation of key production sectors and activities that are detrimental to nature into sources of biodiversity finance, and a withdrawal of funding for activities that negatively impact nature.
- **Commitment and accountability to ensure results:** commitment at the highest political level - and by all of society - is essential to deliver the transformative change that is required by 2030. This needs to be supported by a transparent implementation and accountability process which tracks actions, monitors outcomes, and ensures progress towards the global targets. This process must allow for increasing of ambition and action over time and the integration of nature into national development strategies and key economic sectors.

Regarding the Zero draft of the post-2020 framework for biodiversity<sup>6</sup>, the Commission should follow the below key recommendations<sup>7</sup>:

- Increase the level of ambition to create transformational change. This is especially important in the need for Targets that are clearly actionable for different sectors and actors to facilitate the whole-of-government and whole-of-society approach needed – Targets 8-14 should be updated in this manner.

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<sup>6</sup> <https://www.cbd.int/doc/c/efb0/1f84/a892b98d2982a829962b6371/wg2020-02-03-en.pdf>

<sup>7</sup> For further information, please check: <https://www.conservation.org/events/biodiversity-negotiations-2020>

- Ensure the prioritization of ecosystems delivering the benefits to people that are essential for water, food and climate regulation, which is particularly important in Goals 1 and 4 and Targets 2 and 6.
- Adhere to a human rights-based approach which ensures the respect and support of all humanity, including Indigenous Peoples and Local Communities, and thus affects the direct and indirect protection of biodiversity. This is notably relevant to Targets 2, 18 and 19.
- Agree to sufficient and comprehensive resources to finance the full implementation of the Post-2020 Framework.

Furthermore, CI encourages the EU and its member states to support overseas territories capacities in making their own commitments and building adapted and relevant strategies to align with global environmental objectives, such as the Paris agreement, the post-2020 CDB framework and the UN 2030 Agenda for Sustainable Development. Financial and technical support should be strengthened to value their exceptionally high biodiversity with the same level of ambition as in the EU mainland territory. Specific and additional resources should also be allocated to these overseas territories to strengthen regional cooperation in their own region on the same agenda.

## Using external action to promote the EU's ambition

### *International Ocean Governance*

CI welcomes the fact that the new strategy integrates the protection of global marine ecosystems and oceans, which was a major gap in previous biodiversity strategy towards 2020, and calls onto the EU to drive global efforts to improve the protection and sustainable management of marine environment worldwide.

### **Marine biological diversity of areas beyond national jurisdiction**

CI supports the EU's call for an ambitious legally binding agreement on the conservation and sustainable use of marine biological diversity of areas beyond national jurisdiction (BBNJ). CI is aligned in calling for the achievement of clear global procedures for identifying, designating, and effectively managing ecologically representative marine protected areas in the high seas. The EU should work with partner countries to ensure that beyond the protected areas in areas beyond national jurisdiction, the ocean is sustainably managed for wholistic ecosystem health. CI also supports the requirement to conduct robust environmental impact assessments (EIAs) on all activities having an impact in areas beyond national jurisdiction. CI acknowledges the many delays that are occurring as a result of COVID 19 and encourages the EU to use this time where possible to build bridges with relevant countries to achieve more common ground on the elements of the draft text in an effort to maintain the momentum of the negotiations in the next Intergovernmental Conference (IGC 4). CI also encourages the subsequent ratification and implementation as quickly as possible under the current COVID-19 scenario.

### **Deep sea mining**

CI welcomes the strong language of the strategy on deep sea mining and encourages the EU to continue scrutinizing this issue and applying the precautionary principle. It is imperative that international authorities, governments, and the private sector implement a minimum ten-year moratorium on the exploitation of deep-sea minerals or until rigorous and transparent impact assessments have been conducted; the environmental, social, cultural, economic and legal risks

of deep-sea mining are comprehensively understood and mitigated; and the effective protection of the marine environment, including the prevention of biodiversity loss and its ecosystem services, can be ensured.<sup>8</sup>

Current scientific understanding indicates that deep-sea mining will have substantial, adverse and long-term impacts on the species, habitats, and environmental quality of our oceans. While mitigation measures are often used to alleviate environmental impacts in terrestrial and marine industries, similar approaches are not currently available to deep-sea mining, because deep-sea mitigation measures are untested, biodiversity loss is likely unavoidable, and opportunities to restore or offset impacts on deep-sea ecosystems do not exist.<sup>9</sup> Furthermore, deep-sea mining is not necessary to meet future global demands for minerals. Even under the highest demand prediction scenarios, future global demands for minerals can be met with terrestrial sources.<sup>10</sup> Most importantly, deep-sea mining exploitation has not yet occurred at a commercial scale, and therefore the impacts are unknown and must be carefully assessed before any activities commence.

While a minimum ten-year moratorium on deep-sea mining activities is essential, CI recognizes there are already ongoing deep-sea exploration and prospecting activities at numerous sites globally.<sup>11</sup> Despite the clear need for extensive further research to develop procedures and technologies to ensure no loss of biodiversity, critical ecosystems, or the ecosystem services they provide, some governments or private sector entities may also nevertheless proceed with exploitation of deep-sea minerals. In these instances, CI calls on governments, international authorities, and the private sector to adopt the following guidelines:

1. Apply the precautionary principle to deep-sea mineral exploration and prospecting activities;
2. Conduct comprehensive planning prior to any deep-sea mining exploitation activities to ensure conservation of ecologically or culturally sensitive areas, as well as prevent conflict with other ocean users;
3. Apply the polluter pays principle to ensure seabed mining developers and operators compensate for impacts, including potential unanticipated accidents.

## *Trade policy*

### **Bilateral trade negotiations and agreements**

CI regrets the lack of clarity on concrete actions that the EU will take to address the impact of EU trade on biodiversity, and strongly encourages the Commission to come forward with a set of

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<sup>8</sup> [https://www.conservation.org/docs/default-source/publication-pdfs/position-statement-on-deep-sea-mining--final.pdf?sfvrsn=7e23afa4\\_2](https://www.conservation.org/docs/default-source/publication-pdfs/position-statement-on-deep-sea-mining--final.pdf?sfvrsn=7e23afa4_2)

<sup>9</sup> Miller, Thompson, Johnston & Santillo (2018). An overview of seabed mining including the current state of development, environmental impacts, and knowledge gaps. *Frontiers in Marine Science* 4(418): 1–24 ; Niner, Ardron, Escobar, Gianni, Jaeckel, Jones, Levin, Smith, Thiele, Turner, Van Dover, Watling & Gjerde (2018). Deep-sea mining with no net loss of biodiversity—an impossible aim. *Frontiers in Marine Science* 5 (53): 1–12.

<sup>10</sup> Teske, Florin, Dominish & Giurco (2016). Renewable energy and deep-sea mining: supply, demand and scenarios. Report prepared by ISF for J.M.Kaplan Fund, Oceans 5 and Synchronicity Earth, July 2016 ; Tisserant & Pauliuk (2016). Matching global cobalt demand under different scenarios for co-production and mining attractiveness. *Economic Structures* 5: 4.

<sup>11</sup> Koschinsky, Heinrich, Boehnke, Cohrs, Markus, Shani, Singh, Stegen & Werner (2018). Deep-sea mining: interdisciplinary research on potential environmental, legal, economic, societal implications. *Integrated Environmental Assessment and Management* 14(6): 672–691; Sharma (2017). Deep-sea mining: current status and future considerations. In: Sharma (Ed.), *Deep-sea mining – resource potential, technical and environmental considerations* (pp. 3–21). Cham: Springer International Publishing.

measures to fully leverage the potential of trade deals to halt global biodiversity loss and address their impact on biodiversity.

The EU should use bilateral trade deals to encourage partner countries to implement international environmental commitments in a systematic way. This implies the inclusion of binding provisions in every future EU Free Trade Agreements (FTAs) – i.e. as essential element clauses. A major weakness remains the lack of compliance measures for Trade and Sustainable Development (TSD) chapters in contrast to the other FTA chapters. Non-compliance with the issues outlined in TSD chapters should have consequences, whether through trade restrictions or other sanctions.

In terms of process, sustainability impact assessments should be thoroughly conducted prior to the conclusion of any agreement, ensuring the full and effective participation of the civil society in the EU and in partner countries. The EU should also develop indicators and conduct regular reports to measure the impacts of its trade policy on global biodiversity.

### **EU legislation to minimise the placing of products associated with deforestation or forest degradation on the EU market**

CI welcomes the strong commitment to present in 2021 a legislative proposal and other measures to avoid or minimise the placing of products associated with deforestation or forest degradation on the EU market, and encourages the EU to deliver swiftly on all the priorities laid out in the EU Communication on protecting and restoring the world's forests<sup>12</sup>.

The new legislation should impose on operators placing products on the EU market to demonstrate these are not linked to deforestation, but also expand the scope to include natural ecosystems conversion and associated human rights violations. Indeed, protecting only forests could lead to displacements of land conversion to other ecosystems that deliver crucial ecosystem services – this is the case for example in Brazil, the Cerrado savannas being converted to crops (primarily soy) and cattle pasture, as opportunities for agricultural expansion in the Brazilian Amazon were limited with the Soy Moratorium. In addition, deforestation and agricultural expansion is often associated with specific human rights violations, such as land tenure, access and use rights, in particular for indigenous peoples and local communities. These challenges need to be addressed in an interconnected way. Therefore, the new legislation should impose on companies to conduct due diligence throughout their entire supply chains – to identify, assess and mitigate relevant risks – and be held liable for these.

Due diligence requirements should also be placed on financial institutions to ensure that the finance and banking sectors are neither directly nor indirectly fueling biodiversity loss, including but not limited to deforestation.

To support the development of an EU regulation, increased financial and technical assistance should be provided to producer countries across the globe to support them in halting deforestation, forest degradation and conversion of natural ecosystems.

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<sup>12</sup> [https://ec.europa.eu/info/sites/info/files/communication-eu-action-protect-restore-forests\\_en.pdf](https://ec.europa.eu/info/sites/info/files/communication-eu-action-protect-restore-forests_en.pdf)

## *International cooperation, neighbourhood policy and resource mobilisation*

Development cooperation funding for biodiversity is an area in which the EU has taken action and considerable progress has been made in the past decade. This step in the right direction needs to be built on with a corresponding increase in the scale of financing within the new Multiannual Financial Framework (MFF) – in particular the Neighbourhood, Development and International Cooperation Instrument (NDICI) – to tackle biodiversity loss globally in the coming years. Although the EU has successfully increased the level of development cooperation for climate action during this period, it is still failing to recognise the importance role played by natural ecosystems in climate mitigation and adaptation. An opportunity is being missed therefore to invest in nature-based solutions as part of the EU's response to climate change.

CI recommends the following:

### **1. Substantially increase funding for global biodiversity**

The EU, together with its Member States, is the largest donor of development aid in the world, but the proportion of European Commission development aid that supports biodiversity-related projects only represents around 2% of the overall EU development aid budget. The EU should significantly step up its funding for nature based solutions in the future NDICI, by setting an ambitious mainstreaming target across the instrument, not only for climate but also biodiversity – this can be done through a specific window for investments that support biodiversity-related projects. This mainstreaming must also be integrated in the programming process and project cycles. Targets should be reflected in programming at country and regional level using an ex-ante approach, with annual reporting to ensure corrective action, as necessary.

### **2. Prevent harmful investments**

The EU should encourage divestment from harmful activities, whether they are harmful public subsidies or private investments – e.g. through clear guidelines and the inclusion of indicators relating to biodiversity loss within the taxonomy developed under the Action Plan for Financing Sustainable Growth, to ensure that financial investments by European companies are not fueling biodiversity loss in partner countries. It must ensure that its own development funding does not conduct to biodiversity loss, whether through grants or blended finance. NDICI programming instructions should include an obligation that 100% of programmes are climate/biodiversity-proof.

### **3. Form partnerships and alliances with developing countries**

CI encourages the development of NaturAfrica and similar initiatives with partner regions and countries, in line with the concept of "Green Alliances" laid out in the Green Deal communication.<sup>13</sup> The Commission should also develop partnerships with key developing countries to address the drivers of deforestation. Such Forest Partnerships should be win-win agreements between partner countries and the EU. They should identify and implement solutions that are inclusive and aim to reconcile different land uses, to reduce deforestation, forest degradation and the conversion of natural ecosystems. This integrated approach should address the root causes of deforestation, including poverty, weak forest governance and land tenure issues, and help achieve a number of linked objectives including biodiversity conservation, climate mitigation and adaptation and socio-economic benefits to Indigenous Peoples and Local Communities.

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<sup>13</sup> [https://ec.europa.eu/info/sites/info/files/european-green-deal-communication\\_en.pdf](https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf)