



Mr. Janez Potočnik
Commissioner for the Environment
European Commission
Rue de la Loi 200
B-1049 Brussels

Brussels, 27 October 2010

Consultation on future options for EU biodiversity policy¹

Dear Commissioner Potočnik.

We welcome and support the adoption of a new headline biodiversity target that aims at

'halting the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring them in so far as possible, while stepping up the EU contribution to averting global biodiversity loss.'

This is an ambitious target and provides a firm basis for developing a robust and effective new biodiversity strategy for the EU. We support the new post-2010 prioritised approach currently being explored and welcome the opportunity to input into policy options for the new strategy. We feel that there are several important areas of EU policy where biodiversity is not given sufficient profile and hope that these will be addressed by the new strategy to ensure it is effective in achieving the biodiversity target.

Economics of Ecosystems

Biodiversity and ecosystem services play a decisive role in social and economic prosperity. The intrinsic cultural value of biodiversity should also not be neglected as a result of economic considerations. The current economic framework has failed to recognize and account for the true values of natural resources. We are concerned that the EU 2020 Strategy will retain an overall objective of "sustainable growth" and that biodiversity will remain subordinate to economic growth and the pursuit of a low carbon economy.

It is, therefore, essential that the approach advocated by the TEEB study, which focuses on the economic valuation of biodiversity and ecosystem services, should be fully operationalised and integrated into conventional national accounting procedures. Appraising and valuing ecosystem services will guide policy decisions and support awareness raising, changes in spatial planning, land use practices etc. Failure to do so will ultimately impose serious economic costs and will curtail our ability to protect and develop stocks of natural capital.

¹ While this letter reflects some of the discussions of the EEAC Biodiversity Working Group, it is not a statement that has been formally endorsed by constituents of EEAC Councils.

Governance

The new EU Biodiversity Strategy should encourage a participatory culture in order to implement more inclusive governance. The new Strategy must advocate an approach where all stakeholders are fully involved at local and national levels in the development of policies and initiatives for implementing the post-2010 targets. It is essential for national policy frameworks to create the conditions that will allow all interested stakeholders, particularly local communities, who are directly involved in land use management to participate in decision-making and implement conservation initiatives. Participatory approaches will generate “bottom up” initiatives that can make implementation more effective and efficient.

The private sector should also be involved in developing and implementing policies and should contribute to biodiversity conservation through greater transparency - informing the public and their shareholders on how they use biodiversity - and through the provision of funds for the protection and conservation of biodiversity. Civil society organizations and local grassroots networks can have an important impact in producing shifts in policy and positive environmental outcomes. They should be encouraged to participate in biodiversity governance through the provision of funds.

Monitoring

We welcome the launch of the first EU biodiversity baseline and the launch of the Biodiversity Information System for Europe (BISE). Guidance, cooperation and collaboration are required to make best use of existing data and mechanisms at national, regional and pan-European levels. This includes adapting SEBI 2010 indicators to the components of the new 2020 target for biodiversity. Member States and the Commission should address gaps in available data by significantly improving data collation and, where necessary, increasing resources available for the collection and analysis of relevant data.

More comprehensive measures and monitoring are needed for biodiversity as a whole; these should cover the components of biodiversity (genes, species, and ecosystems) in terms of their quantity, diversity and ecological condition. More effort is also needed to develop indicators on sustainable use of ecosystem services. More use should be made of approaches based on the polluter pays principle to contribute to better monitoring of biodiversity pressures and state. Moving responsibility for, and funding of, monitoring to the private sector could reduce the cost burden on local authorities. Furthermore, local communities and other stakeholders should be encouraged to carry out monitoring; this could stimulate interest in biodiversity issues and provide employment benefits. Groups such as these should therefore be the focus of appropriate training and capacity building.

Green Infrastructure

Habitats throughout Europe are becoming increasingly fragmented and more needs to be done to build a sustainable environment for wildlife across Europe. We welcome the Commission’s commitment to prepare an EU Green Infrastructure Strategy. Green infrastructure should be the focus of measurable and strategic sub-targets and exchanges of best practice should be supported and promoted. The target should seek to ensure ecologically coherent networks of protected areas, e.g. Natura 2000 sites, while developing nature-friendly policies in the wider countryside.

Existing EU nature and water policy (the birds, habitats and water framework directive) could drive the development of green infrastructure. Implementation of these policies should therefore be substantially improved with more effective targeting and coordination of resources going into their enforcement. In order to ensure effective delivery of green infrastructure the EU should also coordinate and ensure the spatial coherence between existing national and regional ecological networks.

Invasive Alien Species

Invasive alien species are a growing driver of biodiversity loss and an EU sub-target on invasive species is required to deal with the social, economic, and environmental threats these species pose. This sub-target should aim to; i) prevent the introduction of invasive species ii) establish an early warning and rapid response system, and iii) control and/or eradicate invasive species already settled in the EU. The cooperation of all Member States in addressing invasive species issues such as information sharing, prevention of introduction and spread, monitoring and eradication, is a necessary condition for the successful management of invasive species. We welcome the initiative to develop an EU Strategy for Invasive Species and hope that this will be fully integrated with the sub-target in the Biodiversity Strategy.

Mainstreaming

Perhaps one of the most important factors in sustaining and restoring biodiversity in the long-term is to ensure that biodiversity is prioritised and fully mainstreamed into other sectoral policies such as land use, fisheries, transport, urban development and energy. Only in this way can biodiversity be fully protected and valued and the target for 2020 be achieved.

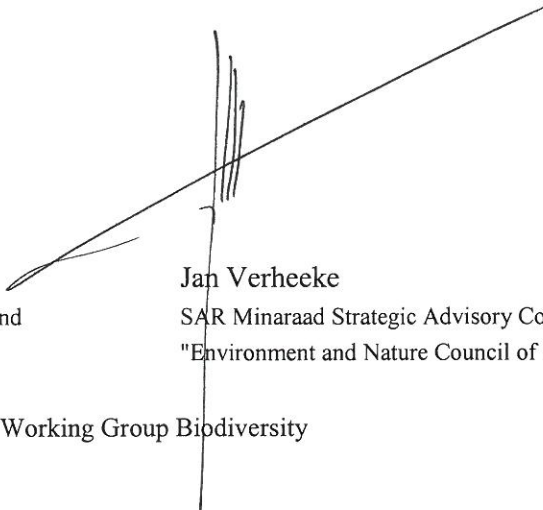
Yours sincerely



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