



DECLARATION ON THE EUROPEAN COMMISSION PROPOSAL FOR A REGULATION ON NATURE RESTORATION

This declaration was presented and approved during
the [13th European Conference on Ecological Restoration](#) organised by
the [European Chapter of the Society for Ecological Restoration](#),

Alicante, 9 September 2022



Declaration on the European Commission Proposal for a Regulation on Nature Restoration SERE2022 Conference, Alicante 9.9.2022

Executive Summary¹

- **The time for action is now.** We call upon the responsibility of the EU Member States and the European Parliament to adopt the Regulation in full ambition as quickly as possible and demonstrate EU global leadership on nature restoration. We, the scientific and professional community, are willing to take responsibility in providing knowledge and support to make the Regulation a success.
- For the drafting of the **National Restoration Plans**, the concept of ‘Favourable Reference Area’, looking at possibilities for re-establishing ecosystems that disappeared or were heavily degraded in the past, is a critical step, especially if it can remediate the fragmentation of still existing ecosystems and help build a more climate-robust and resilient ecological network. In addition, planning must be based on a landscape-approach, including the establishment of buffer zones to protect sensitive nature from surrounding pressures. We recommend Member States to consolidate the National Restoration Plans in their spatial planning and their pledges for the 30% protected area target of EU Biodiversity Strategy 2030.
- Synergies between **climate change adaptation and mitigation** and large-scale nature restoration are obvious, as underpinned by the One Earth Climate Model and numerous scientific evidence. We recommend a stricter and more proactive wording of the criteria on which Member States shall base their quantification of restoration needs, especially for wetlands and freshwater ecosystems, highly biodiverse grasslands and forests, and shallow marine areas.
- To achieve ambitious restoration targets, the **staffing, financing, and knowledge gathering at Member State level should increase significantly**. A specific EU fund for biodiversity protection and restoration is urgently needed. To assure the quality and cost-effectiveness of nature restoration, we recommend the provision of **best-practice guidance** and the adoption of **standards of practice**. Dedicated **certification schemes** can be helpful to ensure the quality of restoration actions and maximize their effectiveness.
- We urge the Council and the EU Parliament to **increase the ambition level for the restoration of drained peatlands**, to stay on a pathway of net zero CO2 emissions by 2050 and the roadmap set out by the One Earth Climate Model. This is also essential if we do not want to undermine the EU’s exemplary role for the rest of the world and lose the numerous co-benefits of rewetting drained peatland.
- We recommend **two additional categories of restoration activities in agricultural landscapes** under Art. 9 aimed at buffering sensitive ecosystems against eutrophication, desiccation, and other pressures, and providing better connectivity between natural areas. In addition, we recommend including **more concrete target levels and deadlines for restoration actions in agricultural, urban and forestry landscapes**. All primary/old growth forest, including areas restored towards this status, should be strictly protected with total non-extraction over an area substantially greater than the 3% currently identified.
- **We believe the target of 20% of the EU's land and sea areas with restoration measures put in place by 2030 is feasible with the appropriate acceleration in mobilising staff, knowledge, and funding.** The target underlines the need for large-scale action if we want to successfully combat the climate and biodiversity crises that threatens our future wellbeing.

¹ Full Declaration text: <https://chapter.ser.org/europe/declaration-on-eu-restoration-law/>

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In 2021, **33 European Expert Networks and Associations and more than 1400 scientists demanded ambition in the EU Nature Restoration Regulation**². On 22 June 2022 the European Commission officially proposed its Regulation. The scientific and professional community, assembled at the occasion of the 13th European Conference on Ecological Restoration³ in Alicante (Spain), congratulates the European Commission on the Regulation Proposal. To further draw attention to the urgency of acting on ecological restoration, we have adopted the following declaration.

1. The time for action is now

The EU Regulation on the restoration of nature is a timely milestone and a long-anticipated call for action. Rapid adoption and implementation of the Regulation is highly needed to successfully combat the increasingly disastrous effects of the climate and biodiversity crises on nature and our societies. We need to choose the path of sustainable land-use and ecologically healthy and resilient ecosystems that provide us with many socio-economic benefits, safeguard food production⁴, and mitigate climate change. Biodiverse and ecologically well-functioning ecosystems support not only our health and wellbeing, but life on Earth as we know it. Any further inaction or hesitation in acting would be irresponsible towards future generations and unforgivable by our children. The Regulation is an essential piece of legislation that complements existing legislation, such as the Birds and Habitats Directives, the Water Framework Directive, the Marine Strategy Framework Directive, and policies such as the Climate, Common Agricultural and Fisheries Policies. With the Regulation, the EU will lead and inspire the world, and provide hope for a sustainable future of our planet. **We call upon the responsibility of the EU Member States (MS) and the**

² <https://chapter.ser.org/europe/declaration-on-eu-restoration-law/>

³ <https://www.sere2022.org/>

⁴ The argument that nature restoration threatens food-security is a false one. Only 21% of the cereal production in 2020 in the EU is used for human consumption ([communication of the EC in 2022](#)). The rest is used for animal feed, biofuels and industry. Further data: [here](#). Globally, up to 40% of all arable land and more than 30% of cereal crop production is used for animal feeds ([Mottet et al. 2017](#); FAOSTAT 2022) and approximately 23% of all captured fish are destined for non-food uses, mainly for fish and livestock feeds ([FAO 2020](#)). This food–feed competition reduces the efficiency of the existing food system, as environmental and resource costs are higher when arable land is used for animal feed production instead of directly contributing to human consumption ([Bowles et al. 2019](#); [Foley et al. 2011](#); [Godfray et al. 2010](#)). On the basis of global crop modelling it was calculated that the present production volumes for 16 major crop types could be maintained on a 50% smaller area of cropland by spatially optimizing fertilizer inputs ([Folberth et al. 2020](#)). While the current global food production depends on planetary boundary transgressions for biosphere integrity, land-system change, freshwater use and nitrogen flows, transformation towards more sustainable production and consumption patterns can support 10.2 billion people within the planetary boundaries ([Gerten et al. 2020](#)).

European Parliament to adopt the Regulation in full ambition as quickly as possible. We, the scientific community, are willing to take responsibility in providing knowledge and support to make the Regulation a success.

2. National Restoration Plans

We welcome the methodical approach based on scientific evidence to identify restoration needs for ecosystems, species, and climate change adaptation and mitigation. The concept of '**Favourable Reference Area**', looking at opportunities for re-establishing ecosystems that disappeared or were heavily degraded in the recent past⁵, is a critical step, especially if it can remediate the fragmentation of still existing ecosystems and help build a more climate-robust and resilient ecological network. Moreover, it is essential that restoration is not restricted to the Natura2000 areas, Annex I habitats, and Annex II species, but also improves the condition of habitat and species specified under the European Red List of Habitat Types and the European Red Lists of Species, and enhances the ecological quality of cultural landscapes, forests, and waterbodies. After all, **healthy ecosystems, green spaces, attractive landscapes and clean waterbodies, and the services they provide us, are needed everywhere, not only in protected areas.** For the areas with the most vulnerable nature, we urge to also consider the need for installing **buffer zones** to protect them from negative pressures. That is also why a **landscape approach** must be promoted to map the national restoration needs. The MS must be encouraged to consolidate their restoration plans in national **spatial planning**, and in their pledges for the 30% protected area target of EU Biodiversity Strategy 2030.

3. Synergies with climate change adaptation and mitigation

2022 is projected to become the year with the most severe drought in Europe in 500 years⁶. We need nature-based solutions to tackle the climate crisis, manage the risk of natural disasters as wildfires and flooding, and advocate for **large-scale effective strategies to identify the needs and opportunities for massive ecological restoration, especially for wetlands and freshwater ecosystems, highly biodiverse grasslands and forests, and shallow marine areas.**

⁵ The Regulation proposes to look back approximately 70 yrs. In many MS the period after the Second World War coincided with large-scale changes in land-use and soil productivity with better drainage, control of natural landscape dynamics, land reclamation on seas and lakes, cessation of traditional agricultural land-use and land abandonment, more intensive forestry practices etc. At the same time, aerial photos and soil and vegetation maps became more readily available and testimonials of early conservationists were recorded. The 70 years should not be a fixed reference period if other relevant (older or younger) scientific data are available, especially when they represent a reference point for good condition, but it is essential that MS understand the landscape changes that have been taking place in the past to draft their National Restoration Plans.

⁶ <https://euobserver.com/green-economy/155853>

The Regulation recognizes the importance of synergies but is lacking ambition in promoting truly large-scale integrated restoration of these ecosystem types in line with the needs called for by the **One Earth Climate Model**⁷. MS are allowed to decrease ambitions if they consider that climate change hampers the potential of successful restoration (art. 4/8-9), and there is the rather neutral formulation that MS only have to ‘describe the estimated synergies’ with combatting climate change in the National Nature Restoration Plans (art. 12/2j). We advocate to include a **stricter and more proactive wording of the criteria on which MS shall base their quantification of restoration needs in their planning (art. 11/2a) in relation to climate change adaptation and mitigation**. Different scenarios should be described in the plans, including the potential for large-scale restoration, whilst taking into account the Favourable Reference Area criterium and an analysis of the full potential to restore coastal ecosystems, regularly flooded areas, forests, recently abandoned agricultural lands, and post-mining landscapes. To ensure better connectivity between protected areas and across entire landscapes, the proposed 10% share of agricultural land with high-biodiversity landscape features must also be integrated into the National Restoration Plans.

On the other hand, **misguided climate action can result in destructive outcomes for both biodiversity and climate**. For example, subsidies to use woody biomass for energy production can harm biodiversity and increase losses of valuable forest habitats, or poorly planned renewables-go-to areas⁸ can harm habitats and their connectivity. Afforestation of nutrient-poor and low-carbon ecosystems, such as dunes, dry heaths, and particular grasslands, will destroy these priority habitats despite their unique biodiversity value. Potential trade-offs between climate and biodiversity goals must be foreseen and avoided and must have special attention in the National Restoration Plans.

4. Massive mobilisation of resources and knowledge needed

The current ecological challenges are huge and urgent, and therefore need massive financial support, knowing that every invested Euro will be paid back multiple times⁹. **Thus, a specific EU fund for biodiversity protection and restoration is urgently needed to support the efforts of the MS that will provide them with a positive perspective in terms of restoration ambition**. At the same time, adverse subsidies that facilitate biodiversity loss need to be stopped. Activities and outcomes that are harming nature and biodiversity need to be efficiently taxed.

We are pleased to read that MS will need to carry out the preparatory monitoring and research needed to identify restoration measures. Ecosystem mapping and understanding of ecosystem and landscape functioning is essential to deliver high quality National Restoration

⁷ The only climate model showing a breakthrough roadmap to stay below the 1.5 degrees Celsius temperature rise by 2050: <https://www.oneearth.org/below-1-5-c-a-breakthrough-roadmap-to-solve-the-climate-crisis/>

⁸ Wind and solar farms.

⁹ The EC impact assessment studies for the Regulation mention a return on investment in economic value of a factor 8 to 38.

Plans and a cost-effective implementation. We advocate that each MS installs thematic working groups of scientists and practitioners on different ecosystem groups and sections of the Regulation, coordinated by a sufficiently large well-staffed and equipped secretariat that is also responsible for gathering feedback from stakeholder groups. Research institutes need to be facilitated for active engagement in the processes of restoration planning, implementation, monitoring, and reporting. Sufficient resources need to be allocated for long-term research at site level to underpin restoration actions, e.g., mapping of current and past presence of target species, understanding the hydrological functioning, chemical analyses of water, and apply particular focus to soil restoration. Overall, to achieve ambitious restoration targets, **the staffing and financing at MS level should increase significantly. Implementation guidance on different topics provided at EU level can help to increase the efficiency and effectiveness at MS level. For target ecosystem types and species (groups), we recommend the provision of best-practice guidance based on adaptive-learning, and the adoption of standards of practice. Certification of restoration projects, based on standards and complementary to other environmental certification schemes, can be helpful to ensure the quality of restoration actions and maximize the effectiveness of public and private investments.**

The public needs to be brought on board and engaged along all phases of ecological restoration. Actions need to be taken to increase general knowledge about the purpose and principles of ecological restoration and to manage conflicting interests. Education programs for children and adults, and for all stakeholders, including journalists and policy-makers are essential to raise awareness on the multiple benefits of ecological restoration, and bridge the gaps between science-practice and policy. Education and training programs are needed to facilitate knowledge exchange between scientists and practitioners, identify gaps in knowledge and generate innovative solutions.

5. Restoration of drained peatlands

Investments in nature-based solutions for climate change mitigation are ineffective as long as drained peatlands in the EU remain a significant source of greenhouse gas emissions. Currently, they emit 220 MT CO₂-equivalents per year, i.e., 5% of the total EU GHG emissions, whilst also contributing to water pollution and land subsidence. **We urge the EU Parliament and the Council to increase the ambition for rewetting drained peatlands.** In the current Regulation proposal, only 30% of the drained agricultural peatlands are intended to be rewetted by 2030 and 70% by 2050. Derogation to 50% by 2050 is possible if the other 20% entails the rewetting of abandoned peat extraction sites and drained peatland forests. Most probably, under art. 4 the rewetting of drained peatland forests will be primarily restricted to the protected areas in the MS. **This will result in a pathway far from the goal of achieving net zero CO₂ emissions by 2050 and the roadmap set out by the One Earth Climate Model.** Since the EU is globally the second largest emitter of greenhouse gasses from drained peatlands, and as the EU strives to show global leadership in combatting the

climate and biodiversity crisis, Europe must be more ambitious. By large-scale rewetting of our drained peatlands, substantial improvements in flood protection, water scarcity buffering, and water quality come as co-benefits, while threatened habitats of wetland flora and fauna can be restored. Rewetted agricultural peatlands can also be managed for paludiculture by farmers and can cut up to 25% of the total emissions from EU agriculture without sacrificing agricultural land.

6. Other restoration actions on agricultural land

We welcome the Farmland Bird Index and Grassland Butterfly Index as tools to measure progress to improve the ecological quality of the EU's agricultural land. Specific regional guidance will be needed for agricultural stakeholders to identify the actions that are most helpful to achieve the improvement target of the index value. However, deadlines and targets are missing for the Grassland Butterfly Index. In addition, **we strongly recommend two additional categories of restoration activities in the agricultural landscapes under art. 9 aimed at buffering sensitive ecosystems against eutrophication, desiccation, and other pressures, and at providing better connectivity between natural areas.** The latter can be addressed jointly with the aim of more high-biodiversity landscape features.

7. Restoration actions in forest landscapes

We fully support the selection of indicators of art. 10 but miss target levels and deadlines. Their identification should not be left to the MS and will most certainly lead to a large discrepancy amongst countries or regionally less ambitious targets. Therefore, target levels and deadlines for commonly set biodiversity indicators should be set.

All primary/old growth forest, including areas restored towards this status, should be strictly protected with total non-extraction over an area substantially greater than the 3% identified as currently intact in order to secure maximum integrated ecosystem functioning, and benefits for climate change mitigation and biodiversity. Outside these areas, 'close to nature forestry' with continuous cover and natural regeneration should be encouraged.

In Mediterranean Europe, rural abandonment has favoured the expansion of forests. Yet, recurrent drought and wildfire put forest ecosystems at risk, and threaten their capacity to supply vital ecosystem services, including carbon sequestration. **Landscape-scale interventions are needed to reduce forest vulnerability to drought and fire, and increase forest resilience, and should be integrated in National Restoration Plans.** Reducing tree density and favouring heterogeneous landscapes will have additional positive impacts on biodiversity, by opening spaces for other types of habitats of high ecological interest.

Similarly, restoration of abandoned old silvo-pastoral landscapes, degraded by spontaneous scrub and tree invasion, will need special attention in the National Restoration Plans.

8. Restoration in urban areas

We welcome the inclusion of urban areas in the Regulation. Urban ecosystems represent around 22% of the European land surface and have a direct impact on citizens wellbeing by means of the supply of ecosystem services, including disaster risk reduction and control. Targets of the Regulation aim at ensuring no net loss, and increasing green urban spaces in cities, towns, and suburbs, and providing a minimum level of tree cover. **The Regulation and national restoration plans should aim at the highest ecological quality of new green spaces, prioritizing the use of native species, enhancing their role for connecting natural areas, and emphasizing the need to create restored areas that are adapted to climate change**, e.g., in terms of the use of resources for their maintenance.

9. Overall target of 20% of the EU's land and sea areas with restoration measures put in place by 2030

We firmly support the target and believe it is feasible with the appropriate acceleration in mobilising staff, knowledge, and funding. **The target underlines the need for large-scale action if we want to successfully combat the climate and biodiversity crises that threatens our future wellbeing.** However, it needs to be made clear that the 20% must be calculated as the sum of all actions under the area-based targets in art. 4, 5, 7 (floodplains) and 9 (peatlands and high-nature value farmland). For legal enforceability and to assure a fair contribution of each MS, we recommend the 20% objective to be endeavoured at MS level. In addition, we encourage the EU to develop a common GIS platform for the whole EU where MS can submit their restoration plans and actions at the site level to track progress and increase transparency.

Temporary closing note: *This Declaration is currently (23.9.2022) collecting supports from the +1400 individuals and 33 organisations that supported the 2021 Declaration and collecting new supports by SERE2022 Conference participants and other interested scientists, professionals, and organisations. These supports are regularly updated on the Declaration webpage¹⁰. An updated version of this Declaration listing all supports will be published in some weeks.*

¹⁰ <https://chapter.ser.org/europe/declaration-on-eu-restoration-law/>