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PART 3/12

COMMISSION STAFF WORKING DOCUMENT

IMPACT ASSESSMENT REPORT

Accompanying the

proposal for a Regulation of the European Parliament and of the Council

on nature restoration

{COM(2022) 304 final} - {SEC(2022) 256 final} - {SWD(2022) 168 final}

ANNEX II: Stakeholder Consultation Synopsis Report

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1. INTRODUCTION AND OVERVIEW OF THE CONSULTATIONS CARRIED OUT

The **scope** of the consultation activities, as outlined in the Consultation Strategy for this impact assessment, related closely to the initiative's policy objective to restore degraded ecosystems in the EU. The **objective** of the stakeholder consultations was twofold, namely to:

- Gather views, experiences, evidence and data from a wide range of stakeholders, particularly on topics where available evidence was scarce, and
- Test and validate existing analysis and preliminary findings to ensure that the impact assessment is informed by stakeholders and responds to their needs.

The **main stakeholder groups** consulted (based on a preliminary mapping in the consultation strategy) were Member States' authorities in charge of biodiversity, environment and other relevant policy areas at the national and sub-national level; umbrella sector organisations, groups and stakeholders; non-governmental organisations; academia and research organisations as well as the general public. The online public consultation provided an opportunity for any interested stakeholders or citizens to contribute with views and information.

Information about consultations on this initiative was provided via the dedicated page on the Commission's **biodiversity website**[1] and the **DG ENV twitter account**[2]).

The main consultation activities were:

1. Publication of **Inception Impact Assessment**[3] (4 November – 2 December 2020);
2. An **online public consultation**[4] (12 January - 5 April 2021);
3. Five online stakeholder workshops in the period November 2020 to September 2021.

Input from the stakeholder consultations was used in the data triangulation for the impact assessment. The main results from the consultations are summarized below.

[1] https://ec.europa.eu/environment/strategy/biodiversity-strategy-2030_en
[2] https://twitter.com/EU_ENV
[3] Protecting biodiversity: nature restoration targets under EU biodiversity strategy.
[4] See footnote 3.

2. SUMMARY OF CONSULTATION RESULTS

2.1. Inception Impact Assessment

An Inception Impact Assessment was open for public feedback from 4 November to 2 December 2020. A total of 132 responses were received, with the highest response rate from Belgium (24) and Germany (21), as well as fewer responses by stakeholders from most of the EU Member States, as well as several non-EU countries. The share of respondents by different stakeholder groups is presented in **Error! Reference source not found.** below.

Figure 1-1 Main types of respondents to the Inception Impact Assessment

The feedback received revealed overall broad support for the initiative across NGOs, academia, business, citizens and other organisations. Responses suggested that it should contribute as much as possible to the restoration of protected habitats and species - but also that it should go further to restore ecosystems and species not covered by EU legislation and foster connectivity through ecological corridors and green infrastructure.

Calls were made both for legally binding restoration targets and voluntary approaches (funding, payments for ecosystem services or compensation), as well as for measures to support community-led ecosystem restoration and management, knowledge, monitoring and research into the impacts of restoration. Passive restoration as well as measures to protect restored ecosystems and ensure their non-deterioration and sustainable management were considered essential.

Inputs included suggestions for overarching as well as ecosystem-specific EU targets, as well as examples of restoration actions. Some stakeholders proposed that binding targets should be set for the individual Member States, while most considered that the selection of restoration sites should be done at the national and sub-national level, and that the governance, monitoring and reporting framework should provide for this flexibility.

Organisations across the board stressed the need for policy coherence. While there was support for building synergies between biodiversity and climate objectives, many respondents pointed to trade-offs, whereas biodiversity should be priority for restoration.

Calls were made for a comprehensive impact assessment, stakeholder engagement and a science-based approach in the development of EU restoration targets.

2.2. Online public consultation

The survey on developing EU nature restoration targets was published as part of a joint online public consultation on three related biodiversity policy initiatives:

(i) Evaluation of the EU Biodiversity Strategy to 2020,

(ii) Review of the application of the EU Regulation on Invasive Alien Species, and

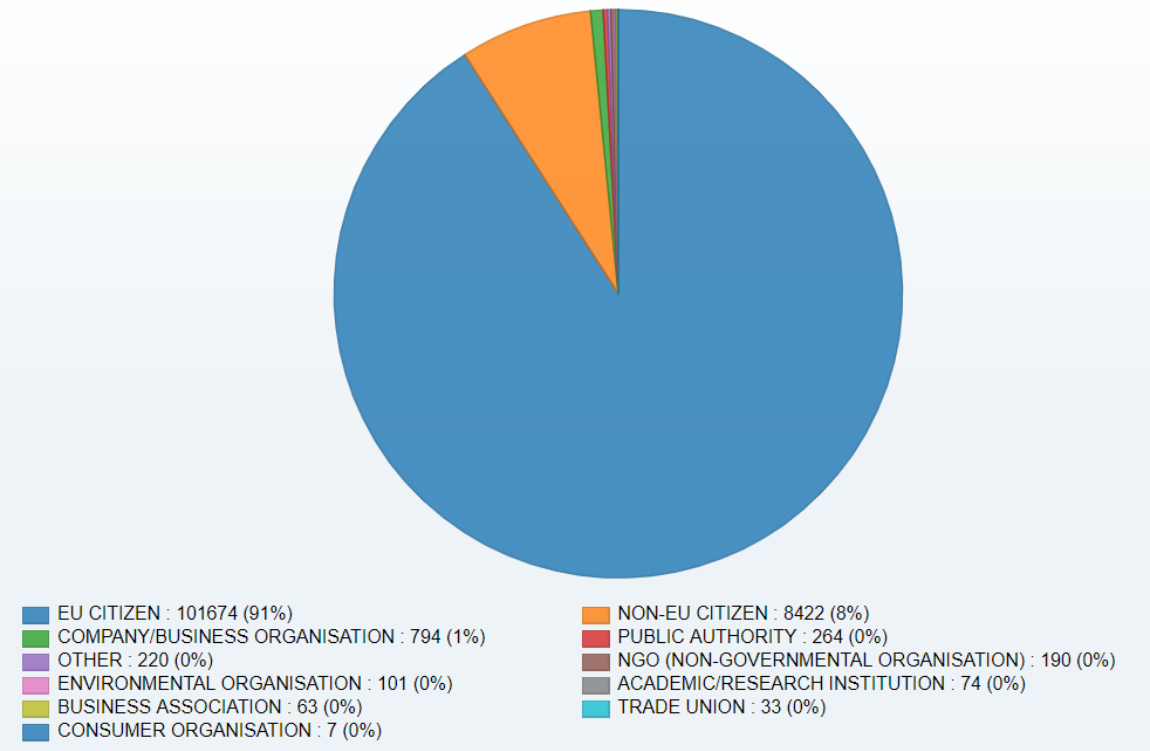
(iii) Development of binding EU nature restoration targets.

The aim was to avoid a proliferation of consultations and stakeholder fatigue, and to ask related questions together and once. The third part of the survey, related to this impact assessment, contained 8 main questions with multiple-choice answers, including an opt-out option ('Do not know'), boxes to elaborate in open text and an open question for further feedback or documents.

2.2.1. Respondent profile

A total of 111 842 respondents filled in the questionnaire.

Figure 2-1 Main stakeholder types (all respondents)



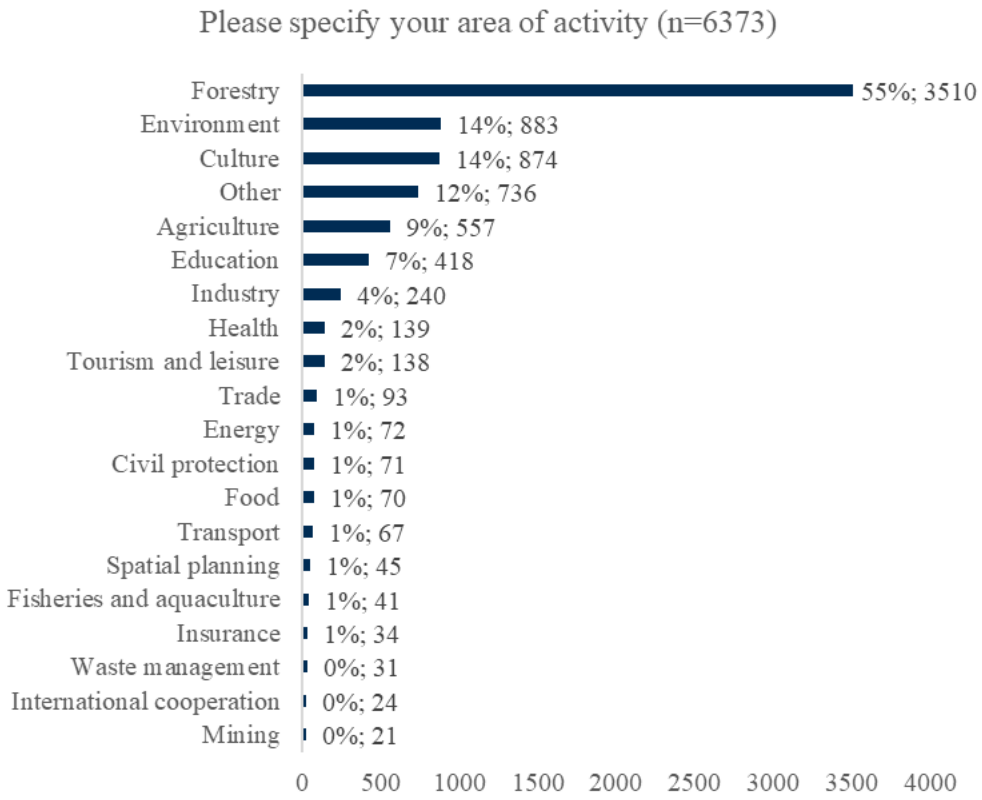
A high number of the responses – 104 471 - were mobilised by the NGO-led campaign #RestoreNature. They provided identical responses, leaving question 1 unanswered. 99.6 % of these responses came from EU citizens or EU-based organisations. When this campaign was isolated, the main stakeholder types among the remaining 7 371 respondents changed as follows:

Figure 2-2 Main stakeholder types (without the #RestoreNature campaign)

Out of the 7 371 responses that were not part of the #RestoreNature campaign (the number of total responses to each question varied as not all respondents answered all questions):

- The overwhelming majority (90 %) came from Poland (6 621 responses). Only one response to the consultation per country was registered for 11 countries.
- Over half of the respondents who indicated their area of activity selected forestry (55 %), followed with a significant margin by environment (14 %), culture (14 %), agriculture (9 %), education (7 %) and industry (4 %). Forestry was the most represented area of activity for most stakeholder types, including 86 % of trade unions and 82 % of companies/businesses. The environment was most often indicated by NGOs and environmental organisations (51 %). Academic and research institutions indicated equally forestry and the environment (38 % each).

Figure 2-3 Area of activity of respondents (without #RestoreNature campaign)



- The most common stated stakeholder category was “EU citizen” making up just over three quarters of the respondents (5 634; 76 %), followed by companies/organisations (780; 11 %), public authorities (258; 4 %) and NGOs (181; 2 %). Other organisations represented less than 1 % of responses each. Among public authorities, 71 % were local, 16 % national, 10 % regional and 3 % international.

In summary, the #restorenature campaign mobilized 93,5 % of all survey responses. The overwhelming majority (90 %) of the remaining respondents originated from Poland; and 55 % specified forestry as their main field of activity. Analysis also revealed slightly different wording but similar meaning of qualitative answers provided by these respondents. A brief sub-analysis of responses is presented where such results have been significant.

2.2.2. Results

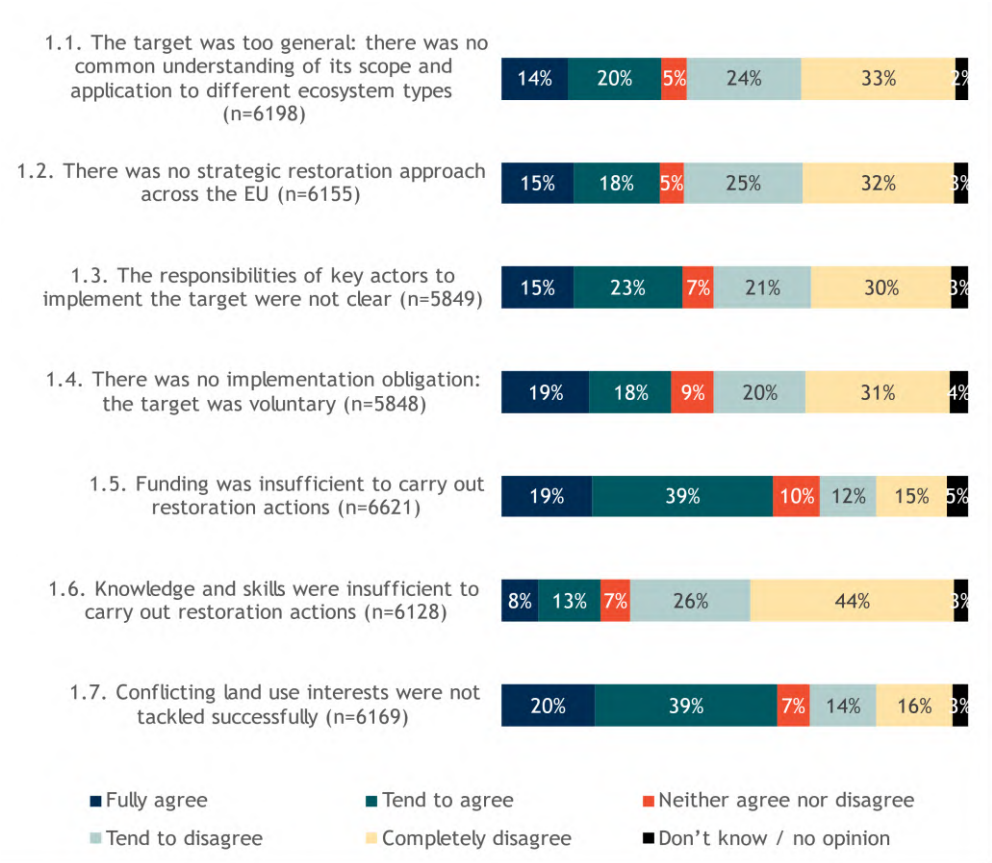
Quantitative information from the questionnaire responses was analysed using in-house tools of the support study contractor (Trinomics). The methodology is described in detail in the support study report. The sections below present for each question of the survey on the development of EU nature restoration targets:

1) An overview of all quantitative responses;
2) An overview of the responses after isolating those mobilized via the #restorenature campaign, and a breakdown of key diverging responses per sectoral stakeholder type;
3) An overview of responses by Polish forestry stakeholders, where significant;
4) Qualitative inputs to open text survey questions (2, 3, 4, 5, 6, 7 and 8).

Question 1. *The EU Biodiversity Strategy to 2020 set the following target in 2011: "By 2020, ecosystems and their services are maintained and enhanced by establishing green infrastructure and restoring at least 15 % of degraded ecosystems". While the evaluation of the strategy is ongoing, there is sufficient evidence that the 15 % restoration target has not been achieved. In your view, which of the factors below have undermined the delivery of the target?*

No responses were submitted for this question by the respondents associated with the #RestoreNature campaign. The quantitative responses are presented in Figure 2-4 below.

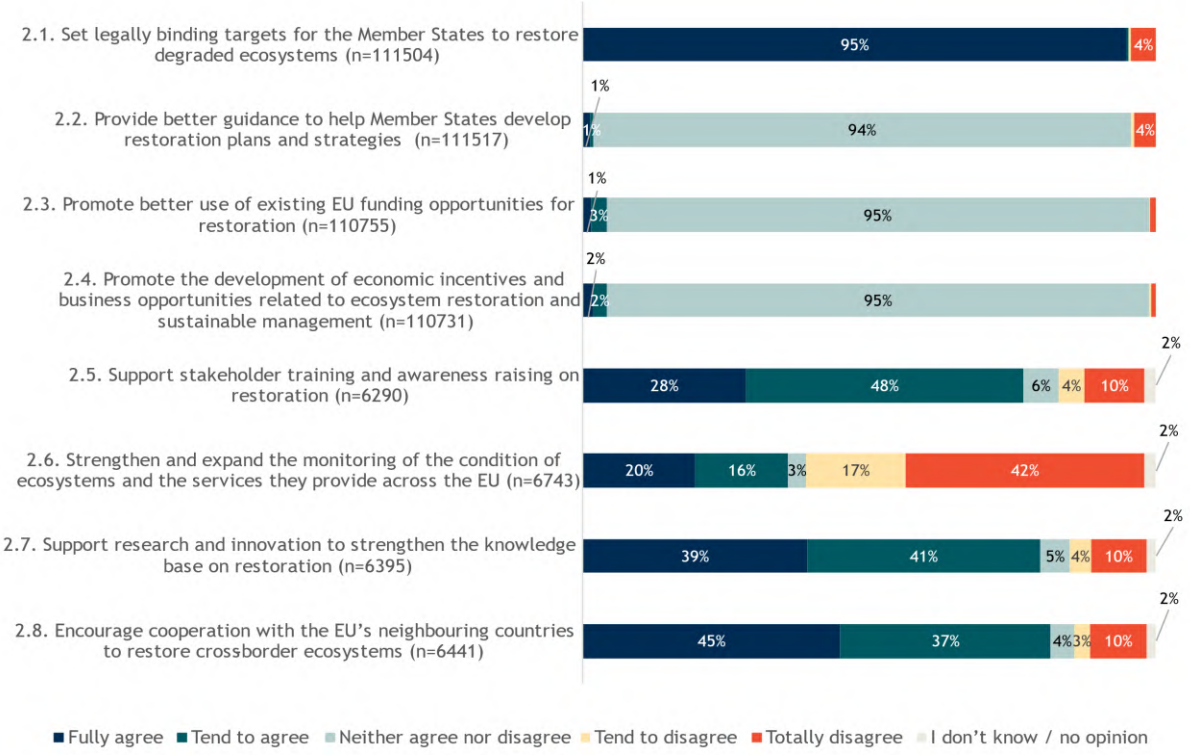
Figure 2-4 OPC responses to Question 1 (without #RestoreNature campaign)



The majority of stakeholders who 'completely disagreed' that the voluntary nature of the target had undermined its delivery were forestry-related (963; 54 %). The majority of stakeholders who 'fully agreed' or 'tended to agree' that unresolved conflicting land use interests were a factor belonged (in decreasing order) to the forestry, environment and culture sectors. The lowest number of respondents considered that insufficient knowledge and skills had been a barrier. Insufficient funding and conflicting land use interests were the answers most often selected by Polish forestry sector stakeholders (39 % and 41 % responded as 'tend to agree', respectively).

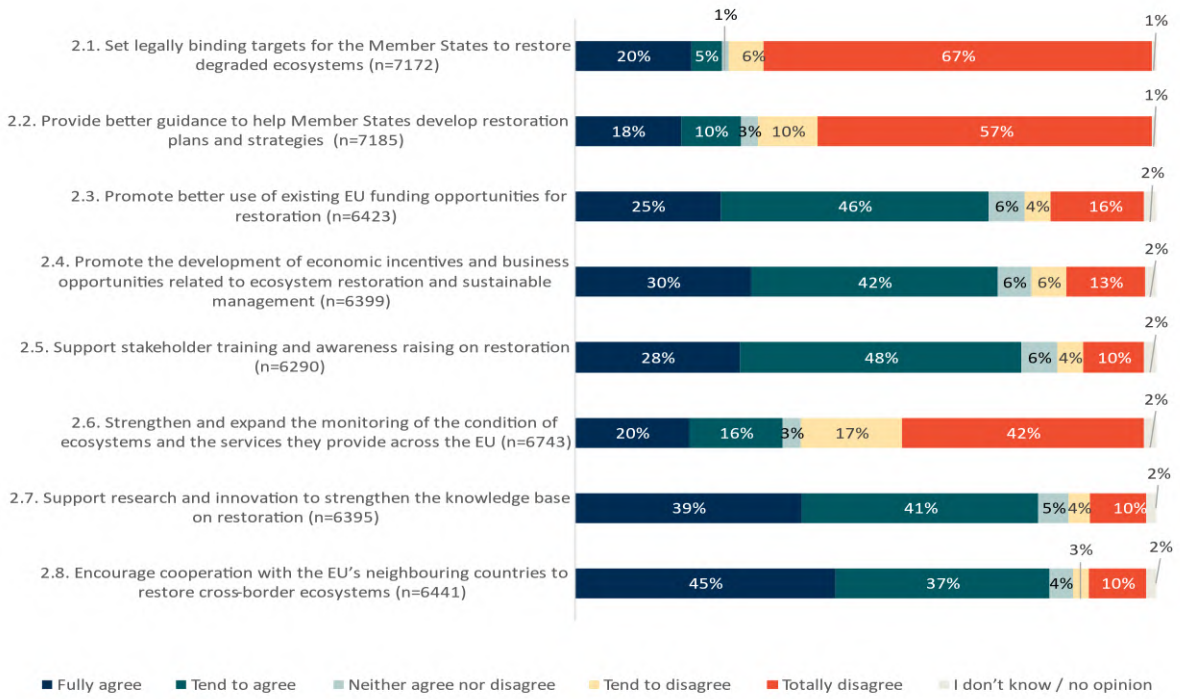
Question 2. *In order to step up the restoration of degraded ecosystems, the EU should:*
Figure 2-5 OPC responses to Question 2 (including NGO-led campaign responses)

Figure 2-6 OPC responses to Question 2 (all responses)



Campaign contributions dominated the response to options 2.1-2.4, resulting in 95 % of all respondents fully agreeing that the EU should set legally binding restoration targets.

Figure 2-6 OPC responses to Question 2 (without #RestoreNature campaign)

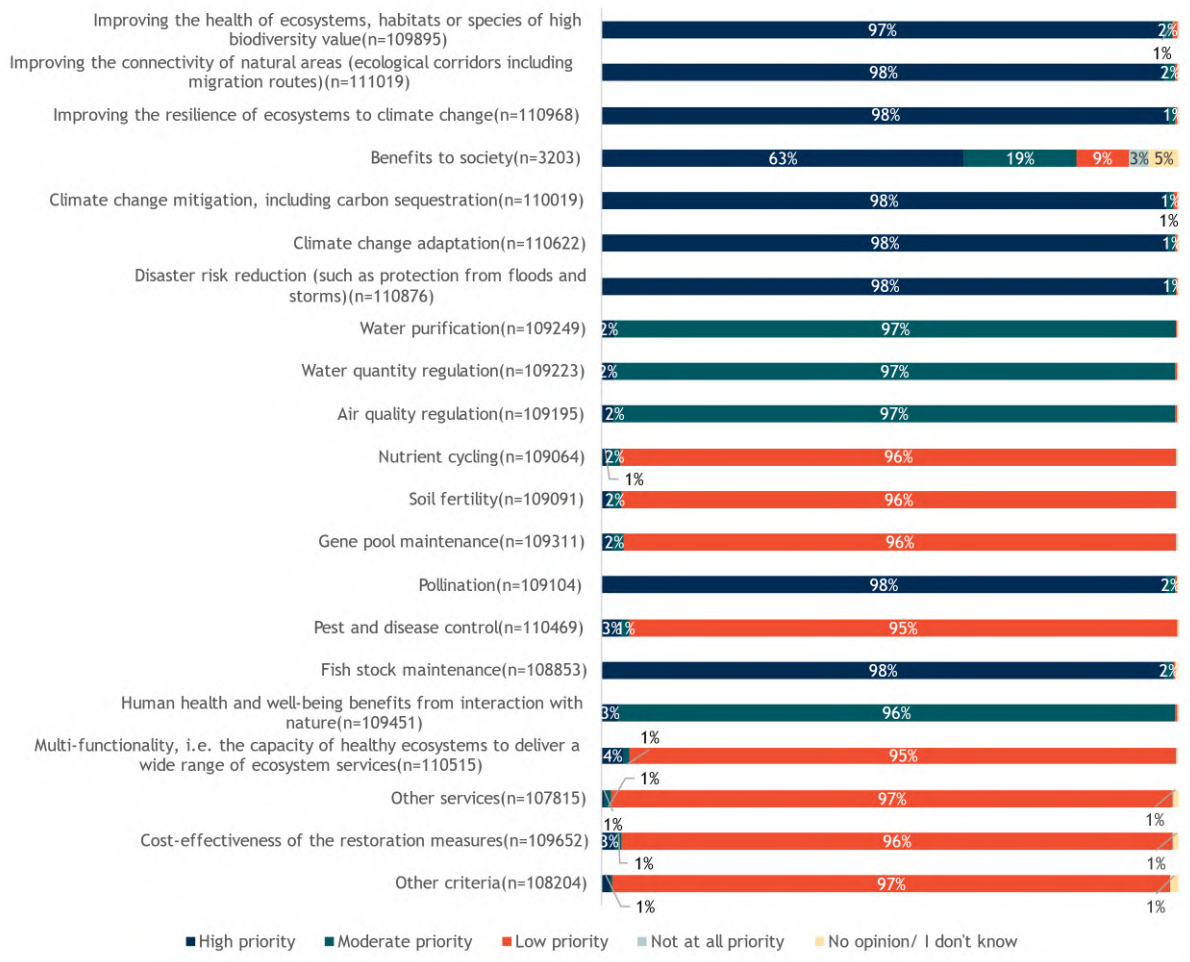


Once the campaign answers were excluded, the remaining respondents overwhelmingly rejected the setting of legally binding targets and the provision of guidance for Member States to develop restoration plans. Most respondents who 'totally disagreed' with these two options belong to the forestry sector (57 % and 55 % respectively), followed by culture and environment. These stakeholders gave more preference to soft measures: funding, economic incentives, training and awareness raising, research and innovation, as well as to cooperating with EU neighbours to restore cross-border ecosystems (forestry stakeholders gave the majority of positive responses to the latter).

Open text comments pointed to a lack of clarity on how restoration is defined, measured or evaluated, and called for a more uniform and clear definition ((9; 18 %) - all of which EU citizens, Poland) and for financial incentives to areas or countries for ecosystem restoration. Respondents also pointed to sustainable forestry management as a way to restore degraded ecosystems (9; 18 % - 8 EU citizens, 1 %).

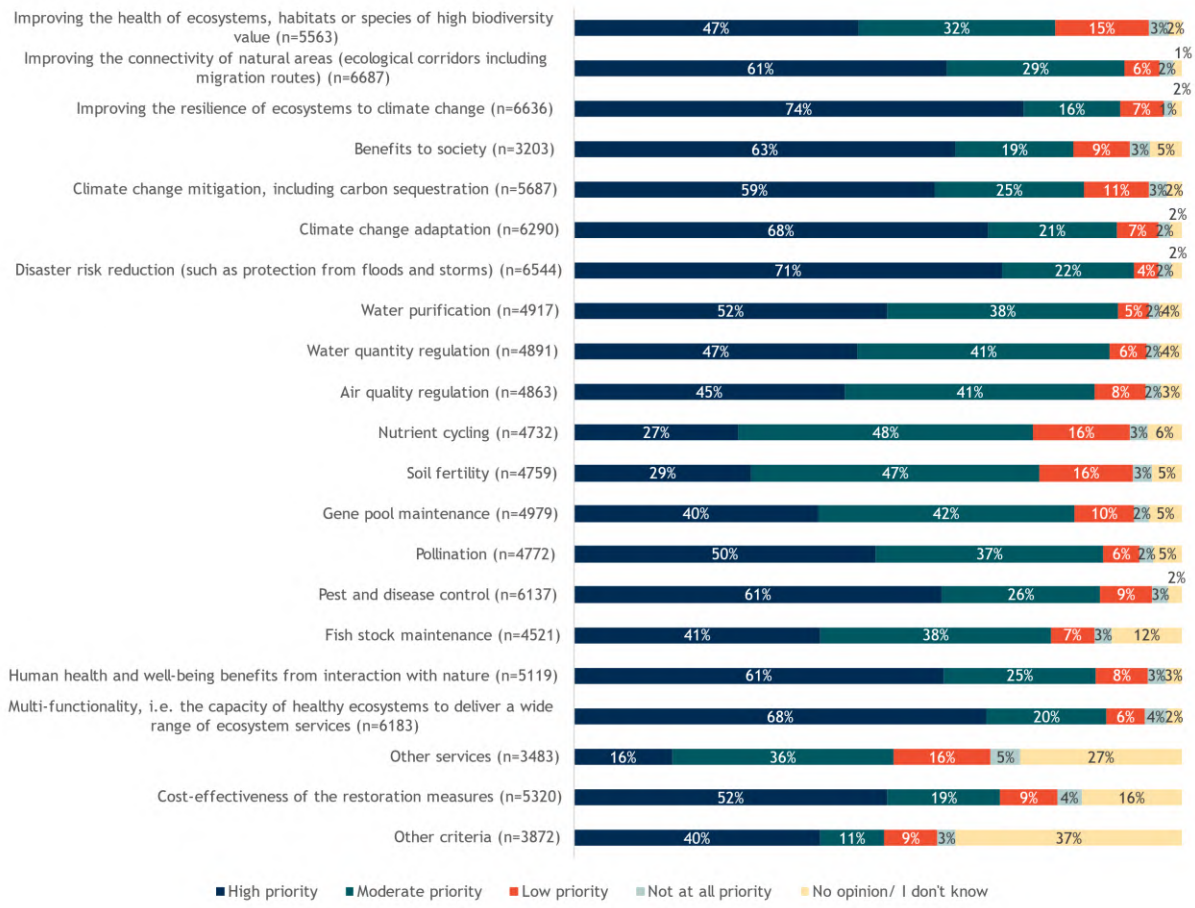
***Question 3**. To what extent should the following criteria guide the setting of priorities for restoration?*

Figure 2-7 OPC responses to Question 3 (all responses)



Campaign responses were given to every question except on 'benefits to society'. 'High priority' was given to improving the health of ecosystems, the connectivity of natural areas and the resilience of ecosystems, to climate change mitigation and adaptation, disaster risk reduction, pollination and fish stock maintenance. Moderate priority was given to water purification, water quantity regulation, air quality regulation and human health. Options on nutrient cycling; soil fertility; gene pool maintenance; pest and disease control; multi-functionality; cost-effectiveness; and other criteria were given 'low priority' in a significantly higher proportion than the answers to the same question without campaign responses, as highlighted in **Figure 2-8** below.

Figure 2-8 OPC responses to Question 3 (excluding responses submitted via the #restorenature campaign)



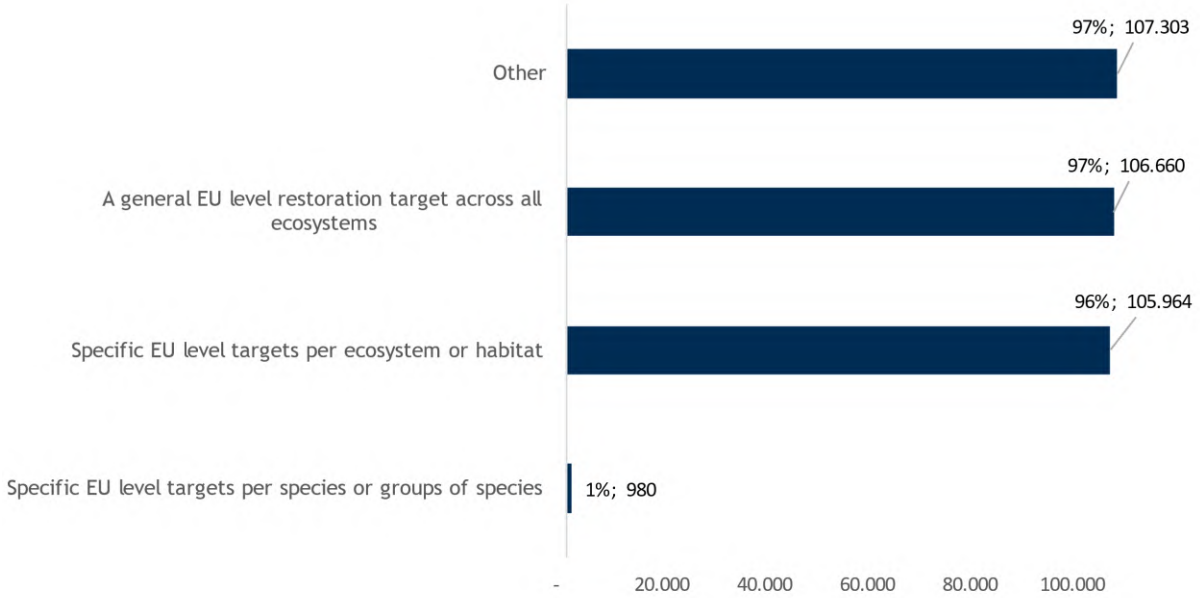
More than half of the respondents considered that all the criteria listed under question 3 should either moderately or strongly guide the setting of priorities for restoration. Improving the resilience of ecosystems to climate change and disaster risk reduction were the two criteria judged the most important (respectively by 74 % and 71 %). The least prioritized criteria were improving the health of ecosystems, habitats or species of high biodiversity value, nutrient cycling and soil fertility (with 19 % of respondents giving them low or no priority).

The results on 'improving the health of ecosystems' and 'habitats or species of high biodiversity value' showed particularly contrasting opinions within stakeholder groups: high priority for 34 % and low for 55 % of forestry actors; high priority for 18 % and low for 9 % of environment actors; and high-priority for 15 % and low for 12 % of culture actors. However, the majority of the responses that were not originating from Poland gave 'high' or 'moderate' priority to all listed but 'cost effectiveness'.

Open-text responses suggested further criteria such as sustainable (forest) resource use and circular economy in forest products, the needs and role of local communities, local knowledge and culture and social and economic consideration for local communities.

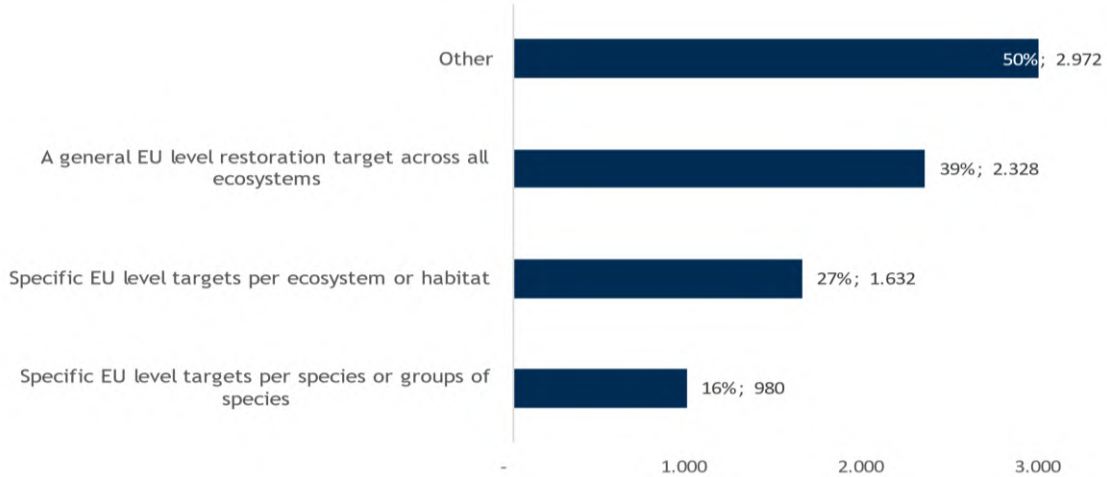
Question 4. *Restoration is the process of assisting the recovery of an ecosystem that has been degraded, damaged, or destroyed. Restoration targets may be set in a number of different ways. They can relate to incremental improvements of ecosystem condition or to reaching good condition; to a percentage of EU area or a specified extent of ecosystems on which restoration activities should take place. The restoration commitments of the EU Biodiversity Strategy for 2030 include such different approaches. In your view, should EU restoration targets be set as (multiple answers possible):*

Figure 2-9 OPC responses to Question 4 (all responses)



The #RestoreNature campaign did not include responses on EU level targets per species/groups of species. A significant proportion of responses were given to 'other' (see detail further down).

Figure 2-10 OPC responses to Question 4 (excluding responses submitted via the #RestoreNature campaign)



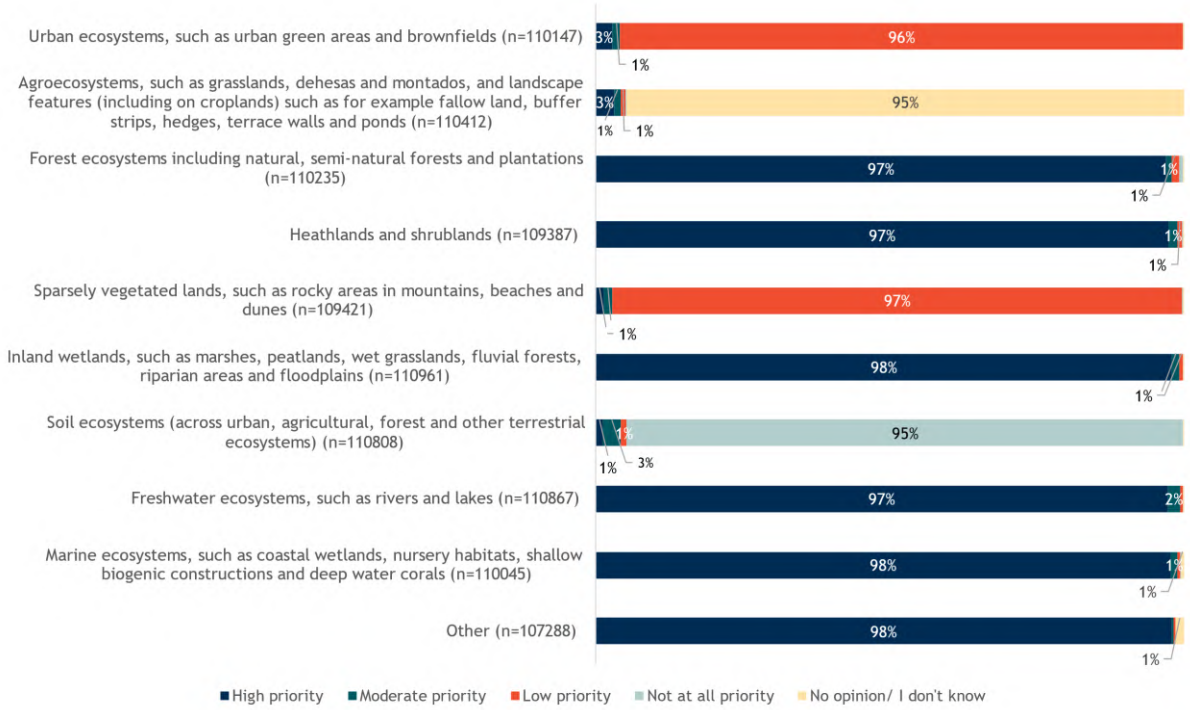
While the ranking of the options is clear, none was favoured by a majority of respondents. Forestry-related stakeholders rather favoured a general EU-level target across all ecosystems

(40 %) than specific EU targets per species or groups of species (29 %) or specific EU targets per ecosystem or habitat (22 %). Responses that originated from Poland largely favoured 'other' (53 %), followed by a general EU target (37 %).

Open text respondents overwhelmingly supported target-setting by the Member States (80 % of open text responses) pointing to local social, historical and cultural knowledge, differences in MS economy and policy structures and biodiversity and ecosystem differences within and between the Member States.

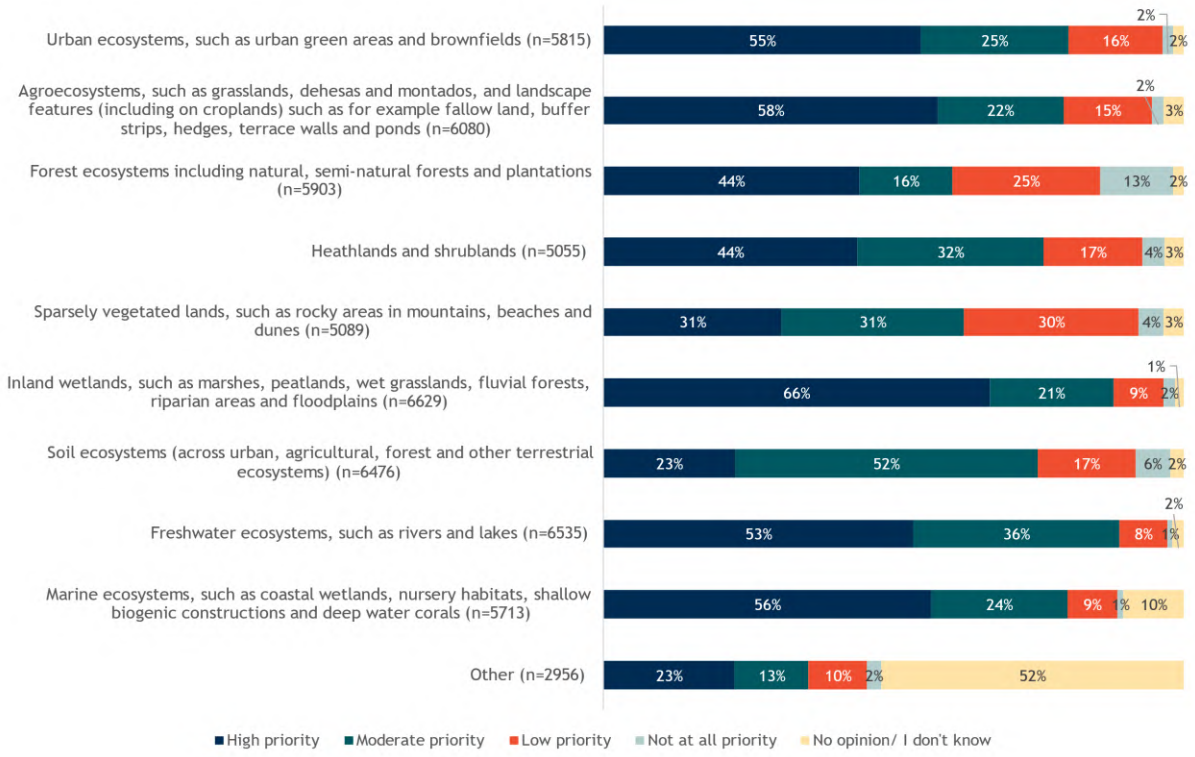
Question 5. *Should any of the following ecosystem types be prioritised for restoration in the EU?*

Figure 2-11 OPC responses to Question 5 (all responses)



Six ecosystems that received high percentage of 'high priority' responses: forests, heathlands, inland wetlands, freshwater, marine and other (elaborated separately). Conversely, urban ecosystems and sparsely vegetated ecosystems received predominantly 'low priority' responses. A high proportion of respondents stated that soil ecosystems should have 'no priority at all', and gave no opinion to agroecosystems.

Figure 2-12 OPC responses to Question 5 (without the #restorenature campaign)



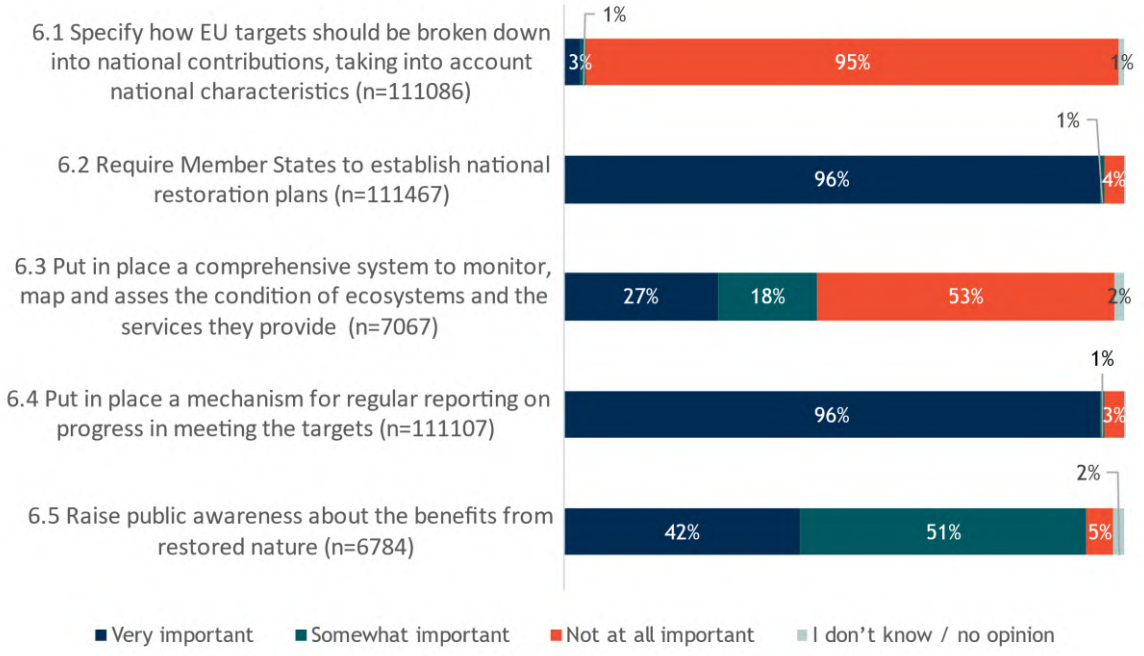
Five ecosystems were seen by more than half of respondents as high priority: inland wetlands, agroecosystems, marine, urban and freshwater ecosystems. All listed ecosystems were seen at least as a moderate priority by at least half of the respondents. Forest ecosystems were considered no priority at all by 13 % of respondents (13 %). Almost half of Polish respondents believed forestry ecosystems should be highly prioritised, indicating diverging opinions in this Member State.

Stakeholders indicating forestry background gave very similar numbers of responses to both high and low priority for forests, sparsely vegetated lands, and soils, indicating diverging views within the sector. Inland wetlands were seen as in need to be highly prioritised by the highest number of respondents in Poland (66 %), closely followed by freshwater (52 %) and urban ecosystems (57 %). Low priority was given to sparsely vegetated lands by 31 % and to forests by 27 %, although the latter also obtained significantly more high priority responses.

Open-text comments added as priority the urban-rural interface and issues facing agricultural lands such as industrial farming, encroachment from cities and the impacts of climate change. Many respondents considered that forests were low priority by comparison with agriculture ecosystems. Many Polish respondents expressed concerns over definitions of ecosystem types, 'semi- natural' and 'natural' state of forests.

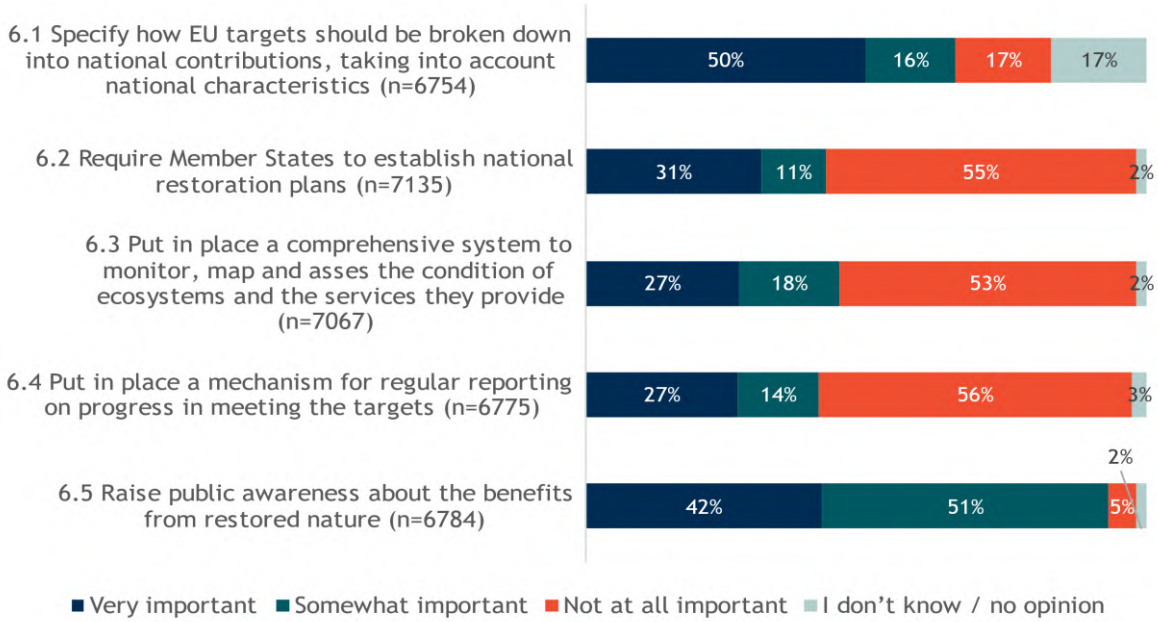
Question 6. *How important do you consider the following factors and measures for ensuring that future EU restoration targets are delivered?*

Figure 2-13 OPC responses to Question 6 (all responses)



As visible from Figure 2-13, campaign responses focused on options 6.1, 6.2 and 6.4 and considered national restoration plans and progress reporting as very important factors to ensure delivery. Conversely, most respondents considered option (6.1) 'not at all important' to ensure delivery.

Figure 2-14 OPC responses to Question 6 (without the #restorenature campaign)



Specifying how EU targets should be broken down into national contributions taking into account national characteristics (6.1) was deemed to be very important by half of the respondents, and somewhat important by further 16 %. However, the highest number of

respondents selected raising public awareness as a somewhat or very important measure. Notably, the majority of respondents considered that a mechanism for regular reporting on progress in meeting the targets, a requirement for Member States to establish national restoration plans, and a comprehensive system to monitor, map and assess the condition of ecosystems and the services they provide were not at all important.

Table II-1 below gives an overview of converging responses per stakeholder type across the various options.

Table II-1 Responses per stakeholder type to question 6

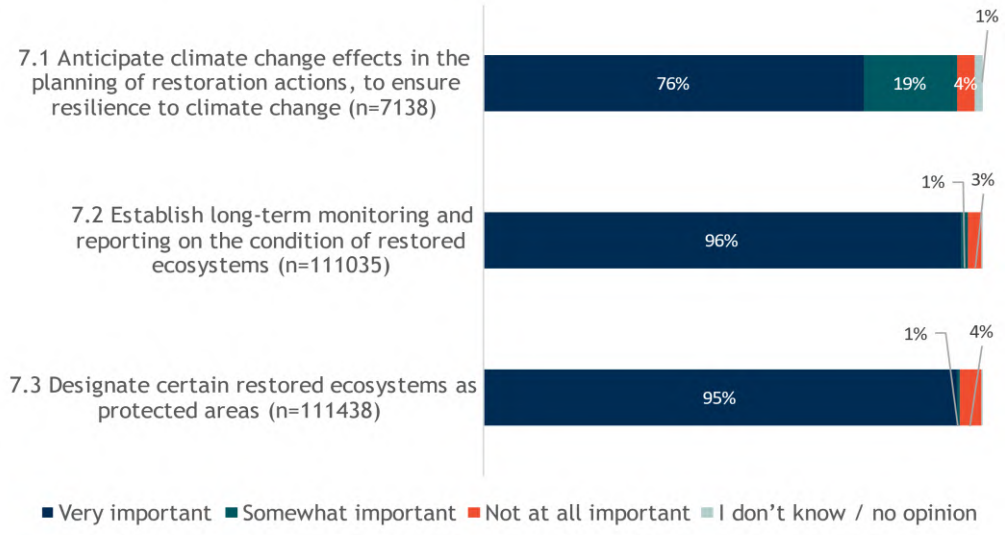
Question Response	6.1 Very important	6.1 Not at all important	6.2 Very important	6.2 Not at all important	6.3 Very important	6.3 Not at all important	6.4 Very important	6.4 Not at all important
Agriculture	9 %	5 %	9 %	6 %	9 %	6 %	9 %	6 %
Civil protection	1 %	1 %	1 %	1 %	1 %	1 %	1 %	1 %
Culture	13 %	9 %	16 %	9 %	17 %	9 %	16 %	9 %
Education	6 %	6 %	9 %	4 %	10 %	4 %	9 %	4 %
Energy	1 %	1 %	2 %	1 %	2 %	0 %	2 %	1 %
Environment	13 %	11 %	18 %	8 %	18 %	8 %	19 %	8 %
Fisheries and aquaculture	1 %	0 %	1 %	0 %	1 %	1 %	1 %	0 %
Food	1 %	1 %	2 %	1 %	2 %	1 %	2 %	1 %
Forestry	45 %	58 %	26 %	57 %	24 %	59 %	23 %	61 %
Health	2 %	2 %	4 %	1 %	4 %	1 %	4 %	1 %
Industry	3 %	2 %	4 %	3 %	4 %	3 %	4 %	3 %
Insurance	1 %	0 %	1 %	0 %	1 %	0 %	1 %	0 %
International cooperation	0 %	0 %	1 %	0 %	0 %	0 %	0 %	0 %
Mining	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Spatial planning	1 %	1 %	1 %	0 %	1 %	0 %	1 %	0 %
Tourism/ leisure	2 %	1 %	3 %	1 %	3 %	1 %	2 %	1 %
Trade	1 %	1 %	2 %	1 %	2 %	1 %	2 %	1 %
Transport	1 %	1 %	1 %	1 %	1 %	1 %	1 %	0 %
Waste	0 %	1 %	1 %	0 %	1 %	0 %	1 %	0 %
Other	11 %	10 %	15 %	8 %	16 %	7 %	16 %	7 %

Polish forestry sector respondents gave clear preference to option 6.1 and 6.5, while 6.2, 6.3 and 6.4 obtained a clear majority of 'not at all important' responses.

Open-text comments varied from stressing that Member States should be responsible for setting the target as well as monitoring and evaluating its progress to advocating for an emphasis on the overall health of habitats rather than on specific species protection, taking into account social and economic aspects, sustainable farming and forestry.

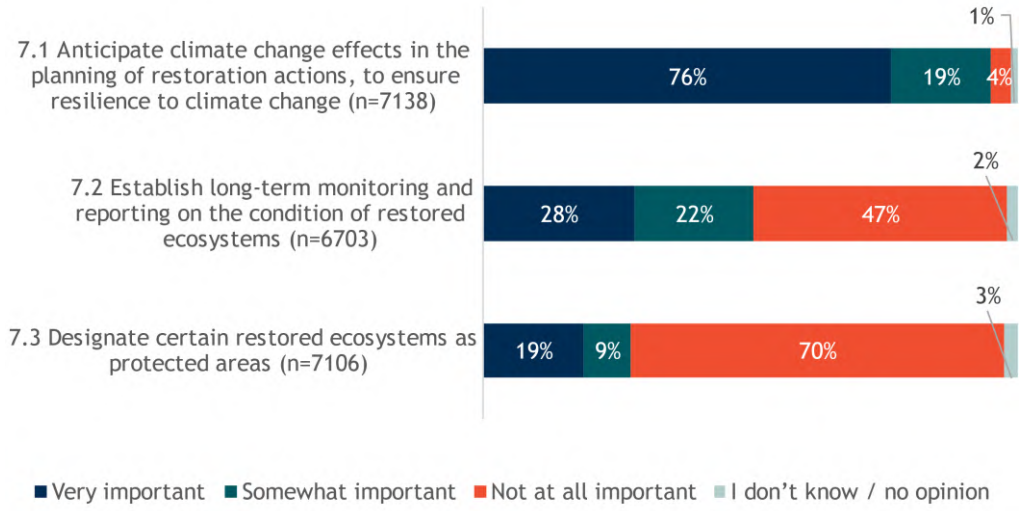
Question 7. *What measures are needed to ensure that restored ecosystems are kept in good condition in the long term?*

Figure 2-15 OPC responses to Question 7 (all responses)



Campaign responses were directed only at options 7.2 and 7.3, as 'very important'. Overall, the majority of responses highlighted all measures as 'very important'.

Figure 2-16 OPC responses to Question 7 (without the #restorenature campaign)



The ranking of the proposed measures differed greatly. Opinions were split on the importance of monitoring and reporting on the condition of restored ecosystems. Open -text comments stressed the urgency to actively restore certain ecosystems and thus favoured active versus passive measures overall. Comments referred again to sustainable management practices and economic considerations adding that strict protection could lead to greater ecosystem loss.

Question 8. *Open question*

Question 8 of the OPC invited respondents to add further detail or information. A list of unique responses was generated in order to exclude campaigns, and screened to extract responses above a given character threshold in order to provide substantive text. Following this initial filter, the formula randomly selected a set of 50 responses per evaluation question. These responses were checked again to indicate possible coordinated replies. Respondents discussed passive versus active restoration and provided arguments and examples in favour of both. Other comments highlighted economic and social sustainability and including local needs. In addition, 20 attachments were submitted to the OPC in relation to the Impact Assessment. They were analysed and summarised at the stakeholder group level below. Ten of these came from academic/research institutions, 5 from environmental NGOs, and 5 from company/business organisations.

Academic/Research Institutions

Country of origin	**Organisation**	**Feedback summary**
Italy	Academic paper	EU policies and initiatives must preserve biodiversity but also meet the demands of local people.
Italy	Academic paper	An integrated strategy should consider ecosystem preservation and rural socio-economic development.
Italy	Academic paper	Green infrastructure and in particular green roofs are crucial for sustainable urbanisation (reviews of German, Swiss and Italian guidelines).
Greece	Conference on the Ecological Importance of Solar Saltworks CEISSA	Consider Solar Sea Saltworks as Constructed Wetlands and include them in the list of protected ecosystems where human intervention helps maintain and safeguard biodiversity and wildlife.
Germany	Institute for Rural Development Research	(Translated). Argues for integrated rural development focus on agriculture, heathlands and water in rural areas.

Country of origin	Organisation	Feedback summary
Germany	Thünen Institute	(Translated) The implementation of protection and restoration measures in forests will have a direct impact on the production of raw wood in the EU member states. It is to be expected that at least part of the raw wood production will be relocated to third countries with a fundamental risk of biodiversity loss. These global biodiversity losses must be set against the biodiversity gains in the EU.
Poland	University in Poznań	(Translated) Priority should be given to tackle the widening gap between science, administration, NGOs; insufficient educational activities for nature conservation; the lack of mechanisms to encourage biodiversity conservation other than by designated actors.
Sweden	Stockholm University Baltic Sea Centre	Policies for healthy and productive marine environments and fishing need to be better coordinated. The quality of management in protected areas is key.
The Netherlands		(Translated) Strategy to conserve meadow birds on modern, intensive dairy farms in the Netherlands is to restrict farming intensity and compensate farmers for their production losses. To increase the breeding success of meadow birds, however, dairy farmers can fine-tune farming practices to yearly and local circumstances.
Germany		(Translated) The market is the most consequential institution of all time, to be borne in mind when considering societal impacts and legislation.

Environmental Organizations

Country of origin	Organisation	Feedback summary
Belgium	European Environment Bureau (EBB)	Proposed overall EU target to restore 15 % of the EU land and sea area (with defined menu of ecosystems to restore), 15 % of all rivers to be restored to free flowing state as well as a target for CO2 removal by restored natural sinks, in addition to the 2030 emissions reduction target. These targets should be met at Member State level, i.e. without effort sharing, so that all Member States contribute

Country of origin	Organisation	Feedback summary
		their fair share and to ensure ecological coherence. If there are ecosystem-specific targets, they need to focus on biodiverse ecosystems with significant carbon storage and sequestration potential, such as peatlands, floodplains, wetlands, old-growth forests, biodiversity-rich grasslands, free flowing rivers and coastal areas or marine ecosystems. Ecosystem specific targets need to be consistent with the EU overall restoration target.
Belgium	Restoring Nature Campaign	Recommendations on elements of the restoration law stressing also that the law must result in urgent large-scale restoration across the EU and should be additional to the relevant EU Directives so as to not undermine or duplicate existing obligations that include some restoration requirements.
The Netherlands	House Sparrow Conservation Holland	Ensure house sparrow protection. EU legislation concerning biodiversity should provide in regulations to uphold similar legislation at state level.
Belgium	Wilderness Conservation Society Europe (WCS- EU)	Very little has been done in the last decade to reduce the impacts of EU consumption on biodiversity outside of the EU. More funding and legislation is needed to support sustainability in Africa and Latin America.
Belgium	Free Rivers Europe	Complements the position paper 'Restoring EU's nature' released by a coalition of 20+NGOs in October 2020 and proposes elements to be considered as part of the nature restoration law related to the protection and restoration of free-flowing

Country of origin	Organisation	Feedback summary
		rivers and freshwater ecosystems.

Business Associations

Country of origin	Organisation	Feedback summary
Spain	SALIMAR	Recognise sea salt marshes as protected ecosystems where a perfect symbiosis between industry and environment takes place.
Germany	Familienbetrie be Land und Forst	(Translated). Family farms support the goals of the EU Green Deal for climate and species protection but these can only be achieved with the instruments of an ecologically social market economy: protection of ownership, freedom of contract, competition, innovation, entrepreneurship.
UK	Sustainable Biomass Program	Lessons learned from the Programme, both in terms of principles that underpin a biomass certification scheme and principles that are advocated for better regulation of biomass
USA	US Industrial Pellets Association-USIPA	Sustainable woody biomass can play a crucial role in delivering the EU's goals while protecting the environment and promoting healthy and growing forests. The sustainability of the biomass and use is paramount.
Belgium	FORTUM	Climate change mitigation and adaptation and their impact must be considered when setting targets; Member States should have discretion to choose their national contribution to overall target, existing frameworks should be utilized in order to avoid creating new administration, interlinkages of restoration targets and water legislation must be reviewed.

2.2.3. Campaigns identified in the OPC

- ***#restorenature.eu***

During the analysis of the OPC responses, one major campaign was clearly identified. It mobilized the overwhelming majority of responses (104 333 identical inputs) to the survey on EU nature restoration targets. This campaign was jointly organised by a coalition of NGOs

including BirdLife, the EEB and WWF EPO and included a **dedicated webpage**[5], with a pre-filled response available in six languages (English, French, Spanish, German, Italian, and Dutch). The quantitative responses are shown below. In addition, identical open text responses were provided through the campaign, as highlighted in the table below.

Table II-2 Identical open text campaign responses identified

OPC Question	Response
2.9	EU must adopt a new law enabling landscape level restoration of high-quality nature leading in due time to biodiversity rich and functioning habitats.
3	The law must exclusively cover restoration of ecological functions and connectivity of habitats and promote natural ecosystem dynamics, with a main focus on ecosystems with significant carbon storage and adaptation potential.
	Focus must be on fundamental land and sea use change that can put nature on a path to sustaining 'high quality'. Improvements of productive systems like agriculture, soil, commercial forestry or fishing should be tackled by other legislation.
4	At least 15 % of EU land and sea area and 15 % of free-flowing rivers must be restored by 2030. The law should also include a target for CO_2 removal by restored natural habitats acting as sinks, on top of 2030 emissions reduction target. The 15 % target must apply equally to each Member State.
5	Restoration definition must be narrow and not include improvement of agricultural soils/urban greening which should be addressed by other policies. It should focus on peatlands, wetlands, forests, grasslands, rivers, floodplains, marine ecosystems.
6.6	We need detailed science-based national restoration plans, to be assessed and approved by the Commission, to ensure their quality and consistency.
7.4	The law should encompass active (e.g. dam removal) and passive (e.g. fishing bans, logging bans) restoration. These restoration activities can be undertaken inside or outside protected areas, in which case Member States should guarantee the long-term protection and improvement of the restored habitats.
8	National restoration plans need to show how restoration measures will support: Improved connectivity of Natura 2000; achieving target of 10 % of EU's land and sea area to be strictly protected; climate change adaptation and mitigation (in particular through water retention to help deal with increasing floods, droughts and sea level rise); objectives of existing legislations (e.g. BHD, WFD, MSFD) while being additional to existing legal requirements; Public participation. The law must contain clear deadlines for the restoration plans and restoration measures, for the approval of the plans by the Commission and for the involvement of interested stakeholders and scientific experts. Monitoring of restoration measures, biodiversity outcomes and progress to targets, through standardized, and frequent national reports will be key.

[5] http://www.restorenature.eu/

	The new law should support the use of existing EU funds and the creation of a dedicated EU restoration fund (or facility within some other fund in the future MFF).

- Once the respondents mobilised via the #RestoreNature campaign were isolated, most of the remaining respondents were found to originate from Poland (90 %) and more than half of the respondents specified forestry as their main field of activity (55 %). More careful analysis revealed that, while the wording of qualitative answers differed slightly between these respondents, it conveyed very similar meaning. In the absence of an officially announced campaign in this Member State and sector, the survey analysis team neither confirms nor rules out possible coordinated action(s). Nevertheless, a bias in the stakeholder representation is significant and needs to be borne in mind when considering the survey feedback.

2.3. Consultation workshops

There were **five consultation workshops** held addressing the following topics:

- Workshop 1: key concepts, restoration needs and presentations on existing restoration activities in the Member States, 9 December 2020 (Member States only).
- Workshop 2: ecosystem-specific restoration targets, 23 February 2021, 185 participants
- Workshop 3: overarching goal and key definitions, 14 April 2021, 198 participants
- Workshop 4: enabling measures, the content of National Restoration Plans (NRPs) and non-deterioration, 25 May 2021, 158 participants
- Workshop 5: options for targets considered in the impact assessment, likely impacts on diverse groups and measures to increase stakeholder engagement and support for implementation. This workshop took place on 8 September 2021 and consisted of two separate half-day sessions: one with stakeholders, and one with authorities from the Member States only.

Overall, about 150 to 200 stakeholders from Member State authorities, NGOs, stakeholder associations, research and academia institutions and European Commission services attended each of the workshops. The Membership list of the Coordination Group on Biodiversity and Nature (CGBN) was initially used as a basis to invite stakeholders. CGBN is the main Expert Group coordinating the implementation of EU biodiversity policy with over 100 member organisations including 40 national authorities from Member States, 9 other public entities such as international and inter-governmental organisation, 47 stakeholder organisations including NGOs, businesses, sector associations and research institutes, as well as individual experts. For the first workshop, only national authorities from this list were invited, who then liaised with colleagues from agriculture, forestry and other ministries who then also registered. The following workshops included stakeholders, starting with the CGBN list, adding further stakeholders upon request, and maintaining these registered participants on the lists for subsequent workshops. Noting the variety of stakeholders who participated, it can be confidently said that the identified stakeholder groups have been reached. A CIRCA site was set up to share workshop materials and minutes with the participants. The main views

expressed by different stakeholder representatives during these workshops are summarised below:

Overarching goal and ecosystem-specific targets

- National authorities showed diverging views. Some prefer to enhance restoration requirements under existing legislation and improve EU-level coordination. Others prefer an overarching aspirational goal set at EU level coupled with ecosystem-specific targets set at the national level, so that they can decide what ecosystems to restore. Others welcome legally binding ecosystem-specific targets at EU level. Some support for targets going beyond HD Annex I habitats, in step 1 already. Some prefer process targets over outcome targets.
- Nature NGOs showed converging views with strong support for legally binding SMART ecosystem-specific targets, while an overarching goal was considered beneficial but less important. They further gave broad support to both process and outcome targets that go beyond Habitats Directive Annex I and cover all EU habitats. An overarching restoration target of restoring 15% of degraded ecosystems by 2030 was seen as too low, with NGOs suggesting a target to restore 15% of the EU land and sea area, and restoring 15% of rivers to a free-flowing state.
- Associations of stakeholders (agriculture, forestry and forest owners) indicated preference for soft measures over legally binding instruments, underlined the need to respect ownership rights and promoted a voluntary bottom-up approach.
- Research representatives welcomed both an overarching goal and specific targets that are legally binding, as previous targets haven't worked.
- Further points raised in the discussion on this subject included area-based targets and the need to set milestones for restoration.

Step-wise approach (i.e. set targets for ecosystems where sufficient evidence exists, and further monitoring and assessment to set targets for other ecosystems later):

- National authorities: broad support for a step-wise approach to ensure positive results in step 1 for a number of ecosystem types.
- Nature NGOs: underline the need for quick action but inquire about mechanism for the second stage.
- Research institutes: scientific knowledge is available to support the restoration of priority ecosystems.

Enabling measures including National Restoration Plans (NRPs)

- National authorities: Some support for NRPs. Several underline their importance for ensuring finance, e.g. at EU level. Call for clarity on the financing need. One Member State warned not to count on private finance too much considering experience with the NCFF.
- Nature NGOs: Broad support for NRPs with clear content requirements and review process with role for the Commission to ensure consistency. One underlined need for

intermediate plans to enable quick action. Some underlined that financing restoration is an investment in job creation, health, etc. Asked about specific EU funds for restoration.

Prioritisation

- National authorities had diverging opinions, from prioritising ecosystems with the most unfavourable status to those with the most human health benefits. Some also referred to cost-effectiveness, given limited resources, and to the need for a common prioritisation framework.
- Views of nature NGOs included the need to prioritise benefits to biodiversity over benefits to climate, and the importance of ecosystem services that are not easily quantified or monetised.
- Research institutes also referred to the importance of prioritising and communicating about restoration benefits to people.

Ecosystem-specific targets

General outcomes of the second consultation workshop:

- Remarks on targets across all ecosystems: (1) they should consider connectivity of ecosystems; (2) they should be in addition to existing legislation and (reporting) obligations, and help enforce these; (3) they should encompass a mix of dimensions, from EU level to ecosystem specific; (4) they need to be based on robust baselines where possible while urgently collecting lacking data; (5) they should allow for different local contexts; and (6) they should feed into an overarching EU level target.
- Individual session outcomes: Fresh water ecosystems and inland wetlands: targets should complement the WFD and Nature Directives, for example on overcoming barriers to achieve continuity and on restoring connectivity between ecosystems beyond the main channels where the net returns are the highest. Marine ecosystems: there should be a mix of targets that cover both specific habitat types and marine biodiversity elements beyond fishing while considering the transboundary nature. Urban ecosystems: there is major potential for restoration, through connectivity and integrative approaches in urban planning, and there are several candidate targets. Forests: targets should be specific and include forest resilience, reforestation and afforestation in places with high potential for biodiversity, connectivity and ecosystem services. Agroecosystems: there should be a mix of measurable targets that contribute to both biodiversity and ecosystem services, and be a catalyst for sustainable agriculture under the CAP. Pollinators (horizontal function across ecosystems): we need to start restoration measures based on available data, while simultaneously developing additional indicators/data. Soil (horizontal function): soil restoration can take a long time so focus on action-oriented targets on a few impact indicators, which can be incorporated into ecosystem targets.

Specific stakeholder views presented during other consultation workshops:

- Some national authorities underlined positive (voluntary) experiences but also the complexity and cost of restoring peatlands. Further points made concerned the need to consider the risk of creating habitat for vectors of diseases; the need for targets on urban ecosystems, soils and rewetting; the CAP targets on farmland birds and soil organic carbon.
- Nature NGOs expressed broad support for targets on agro-ecosystems, considering that they comprise 39% of EU land and are of importance for biodiversity. Different organisations supported targets on wetlands, urban ecosystems (especially on abandoned land), rivers (particularly on free-flowing rivers, keystone species such as eel) and pollinators, as well as the importance of passive restoration for marine ecosystems.
- Associations: an organic farming association underlined that ecosystem restoration and food production are no contradiction, considering the reliance on biodiversity and welcomed targets and indicators on pollinators, farmland birds and soil health. A small-scale farming association warned that intensive farmers would be paid to restore degraded agro-habitats due to intensive farming. A forestry association underlined the importance of reaching favourable status of forests also in light of climate benefits.
- Some research stakeholders welcomed urban restoration as a means to bring benefits close to the people.

Monitoring and EU-wide approach

- Some national authorities emphasized the importance of coherence and data comparability. Suggestions were made to streamline monitoring with the Prioritised Action Frameworks under the CAP, and to build on the Mapping and Assessment of Ecosystems and their Services (MAES).
- A nature NGO pointed out the need for a common approach (indicators, methodology) if the legislation goes beyond Annex I of the Habitats Directive.
- A forestry association underlined the need for improved monitoring of ecosystem condition (data and methods) and reporting under existing systems.
- Research stakeholders offered support and underlined need to zoom into regional rather than national level.

Non-deterioration

- National authorities underlined the importance of reducing pressures.
- Nature NGOs underlined the importance of ensuring no deterioration of both ecosystems that are restored and those that are to be restored (by reducing pressures, such as bottom trawling).
- Forestry favoured a passive approach to restoration, as opposed to one that requires subsidies and management.
- Research stakeholders pointed out that some pressures, like erosion and agricultural intensification, cannot be stopped immediately.

Policy coherence

- Several national authorities called for the restoration proposal to ensure links with other legislation such as the BHD, WFD, MSFD, Taxonomy Regulation and CAP.
- Nature NGOs: some call for the legal proposal to consider links with CAP, CFP and MSFD. Some expressed concerns about the legal proposal potentially postponing the 2020 deadline to achieve good status under MSFD to 2050.
- Associations: an organic farming association underlined the need to consider links with LULUCF.

On the coverage of the options for targets, main ecosystem types and restoration ambition:

- Conservation organisations expressed satisfaction with the overall direction of the targets, a focus on Annex I of the Habitats Directive for Step 1 and the combination of restoration + recreation of ecosystems + bird targets. Conservation, academic and protected area management organisations also emphasized the importance of **ecological connectivity**, the needs of **migratory species** and targets for **vulnerable species** that are difficult to restore. Member States authorities and stakeholders alike pointed to the need to ensure that the targets work in synergy among themselves and with EU legislation and policies. A number of environmental NGOs noted that ecosystems considered for **step 2** only have a monitoring obligation and suggested a non-deterioration obligation to be added.
- **Forestry sector representatives** questioned whether targets could be set without knowing the location and the concrete measures, which would allow an assessment of their feasibility. Some conservation organisations considered the target to complete all necessary marine restoration measures by 2050 unrealistic considering maritime activities and climate change.
- Restoration experts pointed to the need for linkages with instruments such as **protected areas** and **spatial planning**, which could be emphasised in the NRPs.
- A potential risk was identified by experts in environmental organisations and authorities in relation to a target to increase **Soil Organic Carbon**, which could be detrimental if applied to vulnerable habitats with naturally poor soils (such as dunes): it should be properly interpreted.
- Environmental organisations called for an emphasis on the 2030-2040 period in terms of contributing to the biodiversity and climate targets rather than to 'back-load' the ambition. They also emphasized that all targets should consider the **impact of climate change** and with this the evolution of ecosystems and invasive species.
- Several Member States authorities envisaged difficulties in implementing restoration beyond Natura 2000. At the same time, several Member States asked for more ambition to ensure ecological connectivity and for extending the focus beyond natural habitats (Annex I), to cover green infrastructure and diversify agricultural landscapes. One Member State suggested a separate target on high-diversity landscape features as in the Biodiversity Strategy). It was suggested that targets should be considered for intermediary steps towards more naturalness, e.g. to move away from monocultural forests and towards more natural rivers, and that restoration provisions do not lower the ambition of existing requirements.

On the impact of the targets on stakeholders and how to engage stakeholders:

- Several stakeholders pointed to the need to be clear on **who would be responsible to implement** the targets and obligations. Two NGOs commented that the burden of implementation should be placed not only on the nature authorities, but also on other relevant administrations (e.g. water).

- **Forest owners and forestry sector stakeholders** expressed support for a focus on restoration measures rather than on results. The need to ensure respect for **property rights** in the implementation of the targets at the national level was underlined, in relation to restoration on private land that needs prior and informed consent of the owner. They emphasized that, in order to bring forest managers and owners on board, proper consultation and support are needed including finance to compensate them for costs that bring broad benefits to society. Forestry sector stakeoholders further stressed the need to consider impacts **in the value chain**. National forest acts already pose mandatory obligations on forest owners such as for the recovery of stands after disasters or harvesting, and for the removal of dead biomass.
- An environmental NGO in the Baltic Region pointed to likely impacts from restoration on fishermen, the recreational sector and other commercial sectors such as shipping, boating and energy production, for instance by displacement of their activities. New conflicts may arise with restoration when predators return and compete with human uses, making enemies from former allies (such as small fishers). Possible conflicts were also flagged with the objectives of the **Common Fisheries Policy**.
- The need to **involve stakeholders** such as farmers and private land owners, as well as the challenges in this regard were stressed by most Member States during the consultations. Conflicting policy priorities and pressure from other sectors were also highlighted. One Member State expressed concern about the feasibility of mapping the area to be restored in the National Restoration Plan, before having carried out extensive discussions with stakeholders, as this would provoke a lot of reaction. This raised also the question of **funding** for compensation, restoration, management and other related measures.
- **Private forest owners** called for an open approach when planning restoration measures in order to build trust and support. **State forestry representatives** emphasized that restoration needs to be integrated with rural economies. A representatives of an environmental NGO stressed that ecosystem restoration is becoming a matter of survival, turning the tide on the nature crisis. Environmental NGOs saw restoration as a positive agenda for solutions, but noted that the benefits for various stakeholders should be made more visible: farmers, fishermen and foresters will be harmed if we don't act on climate change.
- Several workshop participants from the non-governmental sector pointed to the need to diversify the economic sector to engage with the restoration agenda. For example, the national restoration plans could include new economic activities and business models that would provide alternative livelihoods.

2.4. Ad hoc contributions

Several national authorities and stakeholders made use of the possibility to send input by mail or schedule a meeting with the Commission, including:

- The Norwegian Ministry of Climate and Environment, which expressed support for and commitment to restoration of freshwater and wetland ecosystems, and outlined current restoration activities and plans.

- The Dutch Ministry of Agriculture, Nature and Food Quality, which inquired about the process, timeline, nature of the targets, governance, and envisaged requirements to submit a National Restoration Plan.

- The Finish Ministry of Environment, which asked for clarifications on the targets, the added value of the legal instrument and spatially-explicit areas, and suggested to take account of subsidiarity, consider funding, definitions, time lag of recovery, and overlap/synergies with other policies such as the CAP.

- BirdLife, EEB, WWF and ClientEarth, which advocated for a restoration law that builds on and goes beyond (ecosystems covered under) existing legislation.

- BugLife, which underlined the need for connectivity / reducing fragmentation (including a target to reduce average distances between habitat fragments), in an approach that caters for easy planning and monitoring, informs decision-makers and is easily understood.