



EU Biodiversity Strategy to 2030 WCS EU Recommendations

WCS EU welcomes the European Commission Biodiversity Strategy to 2030^[1], published on May 20th, and is ready to support its implementation. We are pleased that the European Commission has developed such a comprehensive and thorough strategy, which provides the foundation for ambitious action to be taken by the European Union (EU) to tackle the biodiversity crisis. Climate change, ecosystem degradation and biodiversity loss, if left unmitigated, will undermine economies, societies, peace and security, and human well-being, including health. Addressing these critical issues constitutes the biggest global challenge of this century.

Implementation of this strategy must be a central element of the EU's recovery plan and green transition post-COVID-19, and reconcile economic development with nature protection, including effectively regulating all wildlife trade. Today there is consensus that the links between biodiversity and public health must go beyond tackling parasites and pathogens, to also incorporate socio-economic, evolutionary and environmental factors. Healthy wildlife and wild places – particularly healthy and intact ecosystems – underpin global human health. We therefore welcome the strong focus on facilitating a green recovery post-COVID-19 and the links made in the strategy between the protection of ecosystems and biodiversity and the prevention of future zoonotic epidemics.

We would like to provide a number of recommendations that build on and further develop the proposed actions. Our recommendations mainly focus on the international / external dimension of the EU Biodiversity Strategy to 2030 (section 4 in the strategy) and we draw on the global, field-based, scientific and technical expertise of the Wildlife Conservation Society (WCS) in our response. WCS mainly works in high biodiversity countries, particularly developing countries and countries whose economies are in transition, including many Least Developed Countries (LDCs).

Whilst recognising that it is essential that the EU protects and restores biodiversity within its own borders, **the vast majority of global biodiversity lies in the tropics and the ocean but is also highly impacted by EU policies.** For example, 10% of global deforestation is directly related to EU trade and consumption^[2], although forest cover is increasing within the EU. The EU therefore has a responsibility to reverse the negative impacts on biodiversity of its trade and consumption patterns, including through increased investments to protect and restore biodiversity in partner countries. **The external dimension of this strategy is therefore critical and needs to be at the forefront of implementation efforts.**



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We are pleased that the EU is ready to show ambition to reverse biodiversity loss, **lead the world by example and by action, and help agree and adopt a transformative post-2020 global framework** at the 15th meeting of the Conference of the Parties to the United Nations (UN) Convention on Biological Diversity (CBD CoP15). We urge the EU to continue supporting the development and adoption of **an outcome-based goal and action-oriented target addressing the conservation of natural ecosystems** in the CBD post-2020 framework, with particular focus on ecological integrity. We commend the EU for committing to the **net-gain principle** to give more back to nature than it takes, and we urge the EU to ensure that the rest of the world also commits to this principle through the post-2020 global biodiversity framework and other policy interventions.

4. THE EU FOR AN AMBITIOUS GLOBAL BIODIVERSITY AGENDA

We appreciate that the EU recognises that biodiversity conservation needs to be a priority of external policies and programmes and that it plays a vital role in achieving the United Nations (UN) Sustainable Development Goals (SDGs). Successfully achieving SDGs that directly relate to biodiversity conservation (e.g. SDG 15 on Life on Land and SDG 14 on Life Below Water) will contribute to delivering many other goals, including those related to poverty alleviation, food security, sustainable agriculture and fisheries, health, economic development, peace and security, and climate change mitigation and adaptation.^[3]

It is critical that biodiversity is mainstreamed throughout bilateral and multilateral engagements, through the EU's 'Green Deal diplomacy', and forthcoming green alliances. We urge the European Commission to work closely not only with the European Parliament and Member States, **but with non-governmental organisations**, civil society, and other relevant stakeholders, to ensure a high level of EU ambition and mobilise all efforts to protect the world's biodiversity.

4.1. Raising the level of ambition and commitment worldwide

We welcome this section on raising the level of ambition and commitment worldwide. Protecting biodiversity is indeed a global challenge, the next decade will be decisive, and governments cannot afford half measures or a lack of ambition. **We therefore commend the EU for its commitment to lead all efforts** – working with like-minded partners, but also working with all partners – even the ones lagging behind, in **a high ambition coalition on biodiversity – to agree an ambitious new global framework for post-2020 at the upcoming CBD CoP15, and to its implementation in the coming decade and beyond.**

As stated above, we agree with the EU proposal for **a headline global target focused around ecosystems**. Biodiversity conservation requires more than the creation of protected areas or acting to conserve threatened species, and can only be accomplished with a full spectrum response. This type of response depends on an approach that retains ecosystem intactness to the fullest extent possible, keeps common species common, and prevents further extinctions and ecosystem degradation. We are therefore **disappointed by the EU proposal for global ambition to “ensure by 2050, all of the world's ecosystems are restored, resilient, and adequately protected”**, as this is not quantified or measurable and significantly weaker than the



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text proposed in the first zero-draft for a global post-2020 biodiversity framework by the CBD Secretariat. We recommend the proposal for a headline target is significantly strengthened to be ambitious and quantifiable and achieve a net gain agenda for biodiversity, for example: **“By 2030, achieve net gain in the area and integrity of all natural freshwater, marine and terrestrial ecosystems against a 2020 baseline, and no loss in ecosystems with high importance for biodiversity or high ecological integrity, and by 2050 achieve net gain in all natural ecosystems of at least 20%.”**

To ensure the conservation of the most intact ecosystems, we recommend that **ecosystem integrity is a core component of any new global target**. Ecological integrity encompasses ecosystem function, species composition and structure. It is difficult to measure in a uniform manner across ecosystem types, but a proxy indicator is already available at the global level that can be adopted to measure progress towards a global target (such as that proposed in the zero draft).^[4] We strongly encourage adoption of this index as an indicator of ecosystem integrity and additional biome-specific indicators are being developed that can provide more detailed information depending on data availability.

We welcome the EU commitment to protect **at least 30% of the land and 30% of the sea** in the EU. We strongly encourage the EU and its Member States to work with other countries to **adopt a similar target at the global level, as part of the post-2020 global biodiversity framework**. We agree there should be specific focus on areas of very high biodiversity value or potential. We also urge the EU to work to ensure that global goals to protect at least 30% of the land and 30% of the sea are not undermined by investments or activities of EU actors in other countries, or by the footprint of the EU in terms of trade or imports.

We are concerned that **this strategy does not mention anywhere the importance to also strictly protect critically important but highly vulnerable ecosystems - particularly coral reefs**. Whilst coral reefs only cover 0.2% of the seafloor, they support at least 25% of marine species; underpin the safety, wellbeing, food and economic security of hundreds of millions of people; and are uniquely vulnerable to localised and global anthropogenic impacts. The need for a post-2020 global biodiversity framework and associated national policies to focus on coral reef integrity and function has been agreed by the International Coral Reef Initiative, whose forty government members include four EU Member States.^[5]



WCS staff survey coral reef health in Madagascar. Credit: Emily Darling ©WCS



4.2. Using external action to promote the EU's ambition

4.2.1 International Ocean Governance

We commend the EU for supporting the conclusion of an **ambitious legally binding agreement on marine biological diversity of areas beyond national jurisdiction (BBNJ)**. We also commend the EU commitment to **apply zero tolerance towards illegal, unreported and unregulated fishing** and to **combat overfishing**, including through WTO negotiations on a global agreement to **ban harmful fisheries subsidies**. We would welcome more information on the precise steps the Commission will take in this regard.

The EU should also provide financial and technical **support to other countries to protect and conserve their marine ecosystems**. It is critical that the EU promotes the sustainable management and protection of marine and coastal ecosystems globally, both within and outside of protected areas. This should include high biodiversity ecosystems such as **coral reefs, coastal complexes including mangroves and wetlands**, and efforts to achieve a more integrated approach to land/sea and ocean management. The EU should also support countries in establishing and effectively managing **Marine Protected Areas (MPAs)**, based on sound science and strong community and other stakeholder participation and support. It is critical to maintain or recover intact, functional marine ecosystems globally, while also ending overfishing, eliminating bycatch to the extent possible, ensuring that all fisheries are sustainably and equitably managed, including through the promotion of small-scale fisheries^[6], with particular focus on ensuring local livelihood benefits.

The EU should also ensure that **fisheries agreements with third countries are negotiated and implemented through transparent processes to allow oversight of fisheries licenses, and are based on sound science and equity**. In particular, the EU should ensure that such fisheries agreements guarantee local community food security; adopt adaptive management approaches; avoid and work to end bycatch, particularly of priority species such as cetaceans, marine turtles and sharks and rays; require landing of catches in national ports to improve revenue and jobs from processing locally; require onboard human and video monitors to ensure adequate oversight of catches; and set catches based on sound science which requires investment in local fisheries science.



Fishermen in Madagascar. Credit: Julie Larsen Maher © WCS



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4.2.2 Trade policy

We strongly welcome this much-needed section on trade policy in the strategy. We commend the EU commitment to ensure **full implementation and enforcement of the biodiversity provisions in all trade agreements**, including through the appointment of an EU Chief Trade Enforcement Officer. We support the Commission proposal to better assess the impact of EU Free Trade Agreements (FTAs) on biodiversity, with follow-up action to strengthen the biodiversity provisions of existing and new agreements. It is critical to include strong commitments in every future EU FTAs that will ensure the sustainability of trade in wildlife products, and strict enforcement to combat wildlife crime, including but not limited to effective implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Currently compliance measures only relate to the economic components of FTAs and do not apply to the social and environmental provisions of sustainable development chapters. This urgently needs to be changed.^[7] **Non-compliance with provisions on biodiversity should be associated with consequences, whether through trade or other sanctions so that partner countries comply more fully with Trade and Sustainable Development provisions.**

We welcome and support the Commission commitment to present a legislative proposal in 2021 and other measures to **avoid or minimise the placing of products associated with deforestation or forest degradation on the EU market**, and to promote forest-friendly imports and value chains. Such a legislative measure is urgently needed. To be effective in tackling deforestation and forest degradation and leveraging actions to tackle other drivers (beyond EU trade and consumption patterns and the supply of commodities to the European market), the development and implementation of this legislation **needs to be accompanied by the development of Forest Partnership Agreements** with priority countries and regions, as outlined further in our comments under section 4.2.3c.

We welcome and support the Commission commitment to take a number of steps to crack down on **illegal wildlife trade**. This section however **fails to address the wildlife trade as a whole**, which is one of the root causes of the **emergence of zoonotic disease**. The EU must promote and assist the global community **in ending the commercial trade and sale in markets of wildlife for human consumption**, particularly birds and mammals, as a key outcome to prevent future zoonotic pandemics.^[8]

We strongly welcome and **support the Commission proposal to revise the EU Action Plan against Wildlife Trafficking in 2021**. We fully agree that it is essential to tackle this issue for social, economic and environmental reasons, as it contributes to the depletion or extinction of entire species and is one of the world's most lucrative criminal activities. We urge the Commission to provide as soon as possible a clear timeframe and process for such a revision, to conduct a public consultation, and to ultimately ensure the continuation of this Action Plan.

The EU must treat wildlife and forest crimes as serious transnational crimes, in accordance with the definitions established under the UN Convention against Transnational Organised Crime (UNTOC) and as called for in intergovernmental declarations^[9] and resolutions adopted by the UN General Assembly.^[10] The EU needs to treat wildlife and forest crimes as serious crimes both within the EU, by revising existing legislation, as well as externally through its diplomatic



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and assistance programmes. We also encourage the EU to work with other Parties to UNTOC to consider developing a fourth protocol on wildlife and forest crime to define and address a broader suite of transnational organised environmental crime.

We urge the Commission to not only explore a possible revision of, but to commit to and set a timetable for **revising the Environmental Crime Directive**, including to expand its scope and introduce specific provisions for types and levels of criminal sanctions. **EU Member States must treat wildlife and forest crimes as serious crimes**, which would enable the issue to be given the human and financial resources it needs to be effectively tackled and would give the EU greater leverage in asking partner countries to prioritise the issue. The EU and its Member States must commit a similar level of resources and penalties as deployed to fight other serious crimes such as drug trafficking. We welcome the Commission proposal to **consider strengthening the coordinating and investigative capacities of the European Anti-Fraud Office (OLAF)** to work with Member States and non-EU countries to prevent illegal trade and the entry of illegal products into the Single Market.

We also welcome the much-anticipated Commission proposal to further tighten the rules on EU ivory trade this year. However, it is not only about tightening rules, **the EU must close its domestic ivory market and implement a ban on all ivory sales, imports and (re)exports, without further delay.** Ivory trafficking is often cited as a crime undermining the rule of law and exacerbating conflict, corruption, and poverty in African countries that are already struggling to defend their economic and national security.^[11] Evidence shows that the link between the legal and illegal ivory trade exists in the EU^[12] – the world's largest exporter of legal ivory – where traffickers exploit regulatory loopholes in order to misrepresent illegal ivory as legal ivory. It is therefore critical that the EU responds to the call from a coalition of **30 African countries urging the EU to close its domestic ivory market once and for all.**^[13]

Furthermore, recent studies found that significant quantities of meat from domestic and wild animals is smuggled into France^[14] and Belgium^[15] through air passengers, posing risks to animal and human health and biodiversity. The Commission should therefore step up data collection on this issue in other Member States and support and coordinate an EU response to this threat to wildlife and public health risk.



Confiscated ivory items. Credit: Julie Larsen Maher © WCS



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4.2.3 International cooperation, neighbourhood policy and resource mobilisation

We strongly welcome this much-needed section on international cooperation, neighbourhood policy and resource mobilisation. **We agree that delivering an ambitious post-2020 global biodiversity framework will require greater cooperation with partners, increased support and financing and phasing out of subsidies harmful to biodiversity.**

We note however that while this section highlights some important actions, it provides very little detail on how it should be implemented, we therefore provide here some specific recommendations:

a. Increasing financial support

While we welcome the Commission proposal to continue working with its partners and further increase its financial support post-2020, **we are concerned that the strategy does not make any concrete, quantitative financial commitments for global biodiversity conservation.**^[16] Low income countries in the Global South face the greatest shortfalls in budgets for biodiversity conservation despite the fact they harbour most of the world's biodiversity. Building on the excellent EU Biodiversity for Life Flagship Initiative, **the EU should significantly step up its biodiversity funding by creating a concrete target under the new Neighbourhood, Development and International Cooperation Instrument (NDICI).** The European Parliament supports this view by proposing that **45% of NDICI funds should support climate and environmental objectives, including 15% dedicated to environment, biodiversity and the fight against desertification.**^[17] **A specific window for biodiversity and natural resources** must be defined within future External Financing Instruments, to allow for funding to be channelled directly to environment-related priorities in support of partner countries' efforts to pursue their own commitments under the UN SDGs, the Convention on Biological Diversity and related multilateral agreements. Priority should be given to high biodiversity, low income and limited capacity countries. Effective implementation of the future post-2020 global biodiversity framework will also require that **all EU development assistance is deforestation-free and biodiversity-proofed.**

We welcome the statement under 3.3.2 of the strategy that “a significant proportion of the 25% of the EU budget dedicated to climate action will be invested on biodiversity and nature-based solutions” and the proposal for ‘**natural capital investments**’, including restoration of carbon-rich habitats in the EU. We urge the EU to adopt **similar approaches under the new NDICI proposal**, to ensure that a significant proportion of EU official development assistance dedicated to **climate action is directed towards supporting nature-based solutions**, and in particular conserving and restoring ecological integrity in order to achieve climate and biodiversity objectives simultaneously. A strategic combination of nature-based solutions, that aim to achieve the conservation and restoration of ecosystems, could also contribute to Land Degradation Neutrality^[18] targets established by governments under the UN Convention to Combat Desertification (UNCCD), as well as to the shared objectives of the CBD, SDGs and UN Framework Convention on Climate Change (UNFCCC). EU development assistance for nature-based solutions should follow the IUCN guidance on standards for nature-based solutions, and reflect best practice to maximize biodiversity and climate co-benefits.^[19]



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b. Supporting the 'One Health' approach

We strongly welcome the Commission's commitment to enhance its support to global efforts to apply the **One Health approach**, which recognises the intrinsic connection between human health, animal health and healthy, resilient natural systems. We would welcome more information on the precise steps the Commission will take to apply the One Health approach, including actions across multiple sectors and public health in particular.

In 2004, with the publication of the Manhattan Principles^[20], WCS launched the global 'One Health' initiative – calling for recognition of “the essential link between human, domestic animal and wildlife health and the threat disease poses to people, their food supplies and economies, and the biodiversity essential to maintaining the healthy environments and functioning ecosystems we all require.” This integrated approach, called One Health, has since been adopted by the World Health Organization (WHO)^[21] and others (and sometimes under other names, such as Planetary Health). The Principles, updated in 2019 as the Berlin Principles^[22], discuss global health challenges at the nexus of human, animal, and ecosystem health.

We welcome the acknowledgement in the strategy that a better **protection of natural ecosystems, coupled with efforts to reduce wildlife trade and consumption** will help prevent and build up resilience to possible future diseases and pandemics. To have a meaningful impact on risk reduction, we would, however, urge the EU to go further and promote and assist the global community **in ending the commercial trade and sale in markets of wildlife for human consumption^[23], particularly birds and mammals, as a key outcome to prevent future zoonotic pandemics (as highlighted in section 4.2.2. Trade Policy).**

We recognise that millions of people depend on wild meat and fish for food and income. Wild meat is an important source of protein, fat, and micronutrients for many rural communities. It is an essential part of the diet for many IPLCs. At present, hunting for wild meat is not managed at sustainable levels, wildlife populations are declining, and rural communities are increasingly experiencing rising levels of food insecurity, particularly protein. The situation is becoming more critical as the demand for wild meat grows, particularly in urban areas where it is consumed as a luxury or tradition.

We therefore recommend that the EU support other countries especially in Africa in developing **locally-produced, sustainable non-wildlife high quality, nutritious food, involving both animal and plant protein** (through funding and technical partnerships) to enhance food security and reduce dependence on wild meat in villages and provincial towns. As wildlife and wild fish are primarily eaten for their protein content, the EU should explore locally appropriate methods of raising acceptable plant proteins in large quantities and potentially insect proteins. Any actions on human and wildlife health must necessarily closely involve IPLCs dependent on wildlife for food, in order to secure their needs and respect their rights, and develop community-based monitoring to help provide early warnings of wildlife mortality, while providing a meaningful transition to non-wildlife high quality food sources, for food-insecure local communities. The EU should also consider how its fisheries agreements are designed to ensure that they enhance local food security and livelihoods (see section 4.2.1. on international ocean governance).



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A great example is the seven-year **Sustainable Wildlife Management (SWM) Programme**, which aims to develop innovative, collaborative, and scalable new models to conserve wildlife and improve food security for IPLCs. SWM is an initiative of the EU and the African, Caribbean and Pacific Group of States (ACP), and it relies on the expertise of the UN Food and Agriculture Organisation (FAO), the Centre for International Forestry Research (CIFOR), the French Agricultural Research Centre for International Development (CIRAD) and WCS. Respectful engagement with IPLCs is a core feature of the SWM Programme, as reflected by the community rights-based approach and a commitment to ensuring the Free, Prior and Informed Consent (FPIC) from the communities involved.^[24]

Ecosystem degradation is often linked to the commercial wildlife trade but also results in various other processes that affect zoonotic disease transmission. Evidence shows that **ecological degradation increases the overall risk of zoonotic disease outbreaks** originating from wildlife, resulting from multiple interacting pathways including increased human contact with pathogens and disruption in pathogen ecology, as outlined in a new report by WCS that reviews the scientific literature.^[25] **Protecting ecological integrity** should therefore be a priority action within any comprehensive plan to avoid future zoonotic outbreaks, through actions such as spatial planning, the creation and management of effective protected areas, support to ecosystem management by Indigenous Peoples and local communities, and policies to minimize threats caused by particular economic sectors.

c. Encouraging better forest governance

We welcome the EU commitment to promote actions to protect and restore the world's forests in line with the Communication adopted in 2019.^[26] Forest ecosystems around the globe, particularly in Africa, Asia and Latin America are facing a set of unique and expanding challenges and threats, which include poaching of wildlife, the commercial wild meat trade, illegal wildlife trade, deforestation and degradation due to expanding subsistence and industrial agriculture and infrastructure development, charcoal production, and poorly managed and regulated extractive industries (mining, logging, oil and gas). These are all exacerbated by **poor governance**: many of the forested countries feature at the more corrupt end of Transparency International's Corruption Perception Index. Examples include illegal forestry practices, which lead to a massive loss of government revenues in addition to significant biodiversity loss and harm to IPLCs. Mismanagement of forest concessions facilitates access of poachers to wildlife-rich areas, depriving local communities of the socio-economic benefits that should accrue to them from the logging activities. Allocation of mining permits within protected areas often happens without meaningful participation by ministries responsible for forests and protected areas. We therefore urge the EU to play a key role in helping to **address corruption** within the forestry, agriculture and mining/petroleum sectors (particularly for low governance countries with large extractive industry sectors), as the removal of large tracts of forest for any of these three land uses is essentially irreversible. This could include **support for improved cross-sectoral coordination** between the ministries and agencies responsible for extractive industries, infrastructure development, forests and protected areas, to ensure that licences and development projects are planned sustainably.





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One mechanism that can help in this regard is for the EU to support key partner countries and regions through the development of **EU forest partnership agreements** that aim to **halt deforestation, forest degradation and conversion or degradation of natural ecosystems**.^[27] This must include support to protect the world's last remaining ecologically intact areas of forests and other ecosystems that are of extremely high importance for biodiversity, carbon storage and Indigenous Peoples and local communities (IPLCs). Around 30% of carbon emissions are already removed by intact forests^[28] and other ecosystems each year globally, and additional action on forests and other land use at a global level could reduce the remaining net emissions by a further 30% or more. There is a large and growing body of evidence that forest management by Indigenous Peoples is highly effective but in some cases these forests are particularly threatened due to a lack of recognition of land rights and inadequate support for peoples' efforts to protect and manage these areas, which the EU should play a role in addressing.

A preprint of a new composite index on forest integrity is now available^[29] which, for the first time, provides a fine scale **global index of forest ecological integrity** which can also be viewed in map form online.^[30] Measuring forest integrity is just as important as measuring change in forested area, because reduced ecological integrity affects most of the benefits that forests provide (for biodiversity, climate and IPLCs), over huge areas. **We recommend that such a new forest integrity index is therefore adopted as a key measure of success for this strategy and for the success of EU Forest Partnership Agreements in particular.**



Logging concession in the Republic of Congo. Credit: Mark Gately © WCS

d. Reducing pressure on ecosystems and tackling environmental crime

We welcome the Commission's commitment to step up support to partner countries across the world to achieve the new global targets, **fight environmental crime**, and **tackle the drivers of biodiversity loss**. It is critical that the EU promotes the sustainable management and protection of biodiverse terrestrial ecosystems globally, both within and outside of protected areas. We urge the EU to implement and fully fund the recommendations of the ground-breaking **2016 study 'Larger than Elephants: inputs for an EU strategic approach to wildlife conservation in Africa'**^[31], the **2018 study 'Larger than Tigers: inputs for an EU strategic approach to biodiversity conservation in Asia'**^[32], and the forthcoming study **'Larger than Jaguars'** for Latin America. We also encourage the European Commission to prepare and publish an accompanying strategic approach document to guide investments in marine and coastal wildlife conservation around the coasts of Africa.



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The EU has had a major impact on global biodiversity conservation through its long-standing, dedicated support for some of the most important protected areas in Africa. The most important **'Key Landscapes for Conservation'** have already been identified through these comprehensive 'Larger than' studies. We therefore strongly welcome the announcement that the EU will launch a **'NaturAfrica' initiative** to protect wildlife and key ecosystems while offering opportunities in green sectors for local populations, as a way of implementing the 'Larger than Elephants' study (see our recommendations for the EU-Africa Strategy^[33]). We also strongly support the development of similar initiatives for other regions.

Wildlife trafficking has become one of the most lucrative criminal activities and constitutes one of the most immediate threats to biodiversity in many parts of the world. In addition to harming wildlife species, wildlife trafficking undermines local livelihoods and weakens impoverished rural economies further. As highlighted by the **2019 DG DEVCO 'Study on the interaction between security and wildlife conservation in sub-Saharan Africa'**, wildlife trafficking weakens the rule of law, exacerbates corruption, triggers conflicts, funds organised crime syndicates, and in some cases contributes to migration flows.^[34] Although there has been increased political attention given to this issue in recent years, including at EU level, the resources deployed globally to tackle it and the penalties and sanctions applied to offenders fall far short of that required. The EU and government partners can build on existing efforts to increase their partnership and collaboration in tackling wildlife trafficking, for example through **the development of full-chain wildlife law enforcement programmes**. We recommend that the EU implement and fully fund the recommendations of the 2019 security study mentioned above.

e. Increasing support to secure the rights Indigenous Peoples and local communities

We welcome the Commission commitment to strengthen the links between biodiversity protection and human rights, gender, health, education, conflict sensitivity, the rights-based approach, land tenure and the role of Indigenous Peoples and local communities. As guardians of traditional knowledge, it is critical to further engage and increase support to **secure the rights of IPLCs** in biodiversity conservation. We encourage the EU to take leadership and continue to work closely with governments around the world in recognising the contribution of IPLCs, supporting efforts to secure and enforce their rights, **and supporting their participation in the decision-making processes at the local, regional, national, and international level.**

f. Financing of infrastructure to follow international best practice on social and biodiversity impacts

We strongly recommend including a specific action in the strategy to ensure that **financing of infrastructure follows international best practice on social and biodiversity impacts**. Infrastructure for transport, energy production and transmission, extractive industry and agriculture cause some of the greatest negative impacts on the environment. This takes place when infrastructure is developed within natural habitats and other areas of importance for biodiversity and climate protection. New and upgraded infrastructure in formerly intact habitats such as forests will cause direct loss of biodiversity, carbon and other ecosystem services. It is a driver of biodiversity loss and climate impacts, as well as disease threats, as it facilitates access



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to formerly remote areas. This allows unplanned clearance of habitat for agriculture and charcoal, as well as aiding hunting.

Impacts on the most important biodiversity, such as intact forests, grasslands and coral reefs, can be avoided and reduced by following good practice. The EBRD's Environmental and Social Policy^[35], the EIB's Environmental and Social Standards^[36] and the International Finance Corporation's Performance Standards^[37] are recent examples of good practice on which the EU could build a framework for ensuring its investments in Africa avoid and mitigate potential impacts on biodiversity. Notably, the EBRD's policy requires adequate consideration of priority biodiversity such as threatened habitats, vulnerable species and **Key Biodiversity Areas (KBAs)**. WCS has leading experience in helping African governments identify and conserve Key Biodiversity Areas and in helping these governments avoid impacts from development on such priority sites.

The EU should develop and apply **relevant safeguards to ensure its infrastructure investments in third countries are environmentally and socially sound, sustainable, and fully in line with the Mitigation Hierarchy**. Infrastructure projects should at least achieve no net loss, and potentially a net gain (NNL/NG) of biodiversity following development. There is good evidence that application of standards for people and biodiversity when developing infrastructure will reduce climate risk. The EU should also support other governments in developing their own policies on **mitigating impacts from much needed economic development**. This will encourage sustainability and conserve wildlife and community resources.

Infrastructure development covers many different industry sectors. A lack of coordinated planning limits effectiveness of investor policy in avoiding social and environmental impacts. The EU should therefore help governments in developing **cross-sectoral coordination mechanisms**, possibly using experience already gained from previous best-practice work in Gabon^[38] for guidance as a South-South initiative. These will help coordinate infrastructure and industry development and therefore make investment more efficient. Coordination will also allow biodiversity and social priorities to be considered strategically so the long-term sustainable benefits of investments are maximised.

Developers may find it hard to access information on biodiversity priorities and individual projects may not have resources for necessary detailed impact assessments. The EU should therefore **support national analyses of biodiversity spatial priorities**, as was done in Gabon, such as application of KBA criteria.^[39] This will help inform strategic planning of development.^[40] It also can support alignment of mitigation of development impacts with national biodiversity objectives and contributions to global targets.





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CONCLUSION

Overall, we commend the European Commission for developing such a comprehensive strategy that provides the foundation for ambitious actions to be taken by the EU to tackle the biodiversity crisis. We are however concerned that the EU does not make any concrete financial commitment to implement the external dimension of the strategy. We urge the Commission to address this issue as soon as possible by **adopting a target spend on biodiversity, and in addition, committing to fund nature-based solutions under the new NDICI proposal**. Such commitments can provide the basis for working with other countries and regions on ambitious targets to finance the implementation of a post-2020 global biodiversity framework.

We also urge the Commission to clarify certain other aspects of this strategy, including the specific steps the Commission will take to **fulfil all the commitments made and provide a clear timeframe**. We urge the Commission to implement its commitments without further delay.

As decisions about EU external programming are increasingly made by **EU regional and country delegations**, it is critical the Commission ensures that the Biodiversity Strategy becomes a cornerstone of all actions taken in their region/country.

We urge the Commission to fully engage and involve **civil society organisations** in the implementation of the strategy, through transparent consultative processes, including public consultations and stakeholder meetings, including in partner countries.

The EU and its Member States have implemented bold and immediate measures to mitigate the impacts of COVID-19 on human health, wellbeing and security. We now expect the EU and its Member States to do the same to tackle the biodiversity crisis and climate crisis which will otherwise result in dramatic, negative impacts on our society and economies.





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SUMMARY OF KEY RECOMMENDATIONS

General

- The external dimension of this strategy needs to be a focus of implementation, as most biodiversity lies outside of the EU but is impacted by EU consumption and trade patterns.
- The EU should provide information on the specific steps it will take to fulfil all the commitments made in the strategy, with clear timeframes.
- NGOs and civil society should be involved in the implementation of this strategy, including in partner countries.

Post-2020 Global Biodiversity Framework (section 4.1)

- A headline global target for ecosystems should be included in the post-2020 global biodiversity framework. The proposed wording needs to be strengthened to achieve a net gain for biodiversity that is ambitious and quantifiable.
- Ecological integrity should be a core component of any new global target, with the Ecological Intactness Index adopted as a measure of success.
- Protection for at least 30% of the EU's land and sea is to be welcomed and we strongly encourage the adoption of a similar global target.
- Strict protection for critically important but highly vulnerable ecosystems, such as coral reefs, needs to be included in this strategy.

International Ocean Governance (section 4.2.1)

- Support should be provided to other countries to protect and conserve marine ecosystems, including MPAs.
- Fisheries agreements with third countries should be negotiated and implemented through transparent processes, based on sound science and equity.

Trade (section 4.2.2)

- The commitment to ensure full implementation of biodiversity provisions in all FTAs is welcome but a sanction-based approach for non-compliance is required.
- The commitment to present a legislative proposal in 2021 and other measures to avoid or minimise the placing of products associated with deforestation or forest degradation on the EU market is urgently needed and very welcome.
- The commitment to crack down on illegal wildlife trade is welcome but the strategy fails to address the wildlife trade as a whole (legal and illegal), although this a major cause of biodiversity loss and one of the root causes of the emergence of zoonotic disease.
- We recommend that the EU promotes and assists the global community to end the commercial trade and sale in markets of wildlife for human consumption, particularly birds and mammals, as a key outcome to prevent future zoonotic pandemics.
- We strongly welcome and support the Commission proposal to revise the EU Action Plan against Wildlife Trafficking in 2021 and request a clear timeframe and process.



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- Wildlife and forest crimes should be treated as serious transnational crimes, both within the EU (through a revision of the Environmental Crime Directive) and through diplomatic and development assistance programmes.
- Tightening rules on ivory trade is insufficient, the EU should instead close its domestic ivory market and implement a ban on all ivory sales, imports and (re)exports, without further delay.
- Data collection efforts on illegal imports of wild meat into the EU should be stepped up in order to support a coordinated EU response to this biodiversity and public health risk.

International Cooperation and Resource Mobilisation (section 4.2.3)

- There is no quantitative financial commitment for global biodiversity conservation. A concrete target and a specific window for biodiversity and natural resources should be created under the NDICI.
- A significant proportion of development assistance for climate action should be directed towards supporting nature-based solutions.
- All EU development assistance must be deforestation-free and biodiversity-proofed.
- Enhanced support for One Health approaches that recognise the intrinsic connections between human and animal health, and resilient natural systems is very welcome. Protecting ecological integrity should be a priority action to avoid future zoonotic outbreaks, through actions such as spatial planning, protected areas and support for ecosystem management by IPLCs.
- Increased support is needed to develop locally-produced, sustainable non-wildlife high quality, nutritious food, to enhance food security and reduce dependence on wild meat, for example, by scaling up the SWM Programme.
- Actions that protect and restore the world's forests are very welcome and urgently needed. This must include support to protect the world's last remaining ecologically intact areas of forests.
- Support should be provided to priority countries and regions through the development of EU Forest Partnership Agreements that aim to halt deforestation, forest degradation and conversion or degradation of natural ecosystems, with the Forest Landscape Integrity Index adopted as a key measure of success.
- Support is needed to help address corruption within the forestry, agriculture and mining / petroleum sectors.
- The recommendations of the ground-breaking DEVCO 'Larger than...' studies as well as the study on the interaction between security and wildlife conservation in sub-Saharan Africa, should be implemented and fully funded.
- Long-term support for the most important protected areas in Africa is vital and the new 'NaturAfrica' initiative will be critically important. Similar initiatives should be developed for other regions.
- Work should continue with governments around the world to recognise the contribution of IPLCs, support efforts to secure and enforce their rights, and support their participation in decision-making processes.
- Infrastructure investments should follow international best practice on social and biodiversity impacts, including consideration of KBAs. Relevant safeguards should be applied to ensure they are environmentally and socially sound, sustainable, and in line with the mitigation hierarchy.



EU Biodiversity Strategy to 2030

WCS EU Recommendations

ABOUT WCS EU

WCS EU is a Belgian NGO affiliated with the Wildlife Conservation Society (WCS), a global organisation working to deliver wildlife conservation programmes in over 60 countries, mainly in Africa, Asia, the Pacific and Latin America. WCS operates large field conservation programmes, with projects spanning from the tropical forests of Nouabalé Ndoki in the Central Congo Basin to the remote savannahs of Ruaha in southern Tanzania, from the Bismarck Solomon Seas Ecoregion in the Pacific Ocean to the Greater Mekong in Southeast Asia, from the Mesoamerican Biological Corridor to the Amazon and Orinoco river basins. We protect some of the world's most ecologically intact wild places like Niassa in Mozambique, while conducting groundbreaking research on some of the planet's most iconic species, including jaguars, humpback whales, forest elephants and Grauer's gorillas. WCS is also implementing flagship EU-funded programmes, including as a partner in the SWM programme^[41] and to tackle the illegal wildlife trade in Latin America^[42] and the Mekong region in Asia.^[43] WCS is committed to conserving world's wildlife through partnerships designed to benefit people and nature.

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