



EU Biodiversity Strategy

WCS EU 2010-2020 Evaluation and Post-2020 Recommendations

Summary

WCS EU is a Belgian NGO affiliated with WCS (the Wildlife Conservation Society) a global NGO working to deliver wildlife conservation programmes in over 60 countries, mainly in Africa, Asia, the Pacific and Latin America. Our recommendations focus on the international/external dimension of the EU biodiversity strategy (target 6 in the current strategy) as we draw on the global field-based expertise of WCS in our response. 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 but is also highly impacted by EU policies. The external dimension therefore needs to be given prominence and a high level of attention in a new EU post-2020 biodiversity strategy.

Implementation of Target 6 in the EU Biodiversity Strategy 2010 - 2020

Target 6 in the current EU biodiversity strategy 2010 to 2020 focuses on the EU's contribution to global biodiversity conservation. WCS EU notes that considerable technical work has been undertaken to better prioritise financial investments through development aid programmes to benefit biodiversity and commends DG DEVCO for the work undertaken in this regard. On the other hand, very little has been done in the last decade to reduce the impacts of EU consumption on biodiversity outside of the EU. This is a major gap which needs to be tackled in response to the worsening global biodiversity crisis.

Key Recommendations for a Post-2020 EU Biodiversity Strategy

- ❑ Reduce direct and indirect drivers of **biodiversity loss**, including by addressing the EU's global ecological footprint.
- ❑ Reflect international efforts to create synergies between commitments under the **CBD and other related environmental conventions**.
- ❑ Address the drivers of **ecosystem degradation as well as deforestation** within EU policies and funding through the **adoption of targets and metrics that assess ecosystem intactness/integrity**.
- ❑ Substantially **increase funding for global biodiversity conservation**, including for the conservation of marine, forest and all other natural ecosystems.



1. Introduction

Biodiversity has never been under greater threat from human-caused pressures, including (but not limited to) habitat conversion for intensive agriculture, climate change, and escalations in the exploitation of species, including for the illegal wildlife trade. According to the 2019 IUCN Red List of Threatened Species, 40% of species of amphibians, 31% of sharks and rays, 25% of mammals and 14% of bird species globally are threatened with extinction. [1]

A recent landmark report from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) shows that nature is declining globally at rates unprecedented in human history with around one million species now threatened with extinction. As stated by the IPBES' Chairman, "Governments have focused on climate change far more than they have focused on loss of biodiversity or land degradation", although all three are interconnected and equally important to human health and wellbeing. [2] **Biodiversity and natural ecosystems are essential to human survival.** They provide us with food, medicine, clean air and fresh water, protection against natural disasters, and contribute to climate regulation. Overexploitation of natural resources and environmental degradation are causing extensive damage to our oceans and terrestrial ecosystems, jeopardising ecosystem services that underpin our economy and endangering our own health and wellbeing. [3]

There is, however, reason for optimism that this situation can change. According to a study published in May 2019, 96% of European Union (EU) citizens believe we have a responsibility to protect nature and that this is also essential for tackling climate change. [4] Public concern about global environmental issues such as biodiversity loss and deforestation has never been higher, as demonstrated by the intense media coverage of the IPBES report and the recent forest fires in the Amazon and Indonesia, giving an increased political mandate to tackle the issue. [5]



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



Although the EU must do more to protect its own biodiversity, the vast majority of globally important biodiversity is found outside of its borders. Tropical terrestrial, marine and freshwater ecosystems contain more than 75% of all species and over 90% of terrestrial birds. [6] Tropical biodiversity is, however, greatly impacted by policy-making and decisions taken within the EU not least relating to global trade and imports and consumption of products produced elsewhere, for example, 10% of global deforestation is directly related to EU trade and consumption [7], although forest cover is increasing within the EU. The EU therefore has a responsibility to reverse the negative impacts on biodiversity of its consumption patterns, including through increased investments to protect and restore biodiversity in partner countries.

Furthermore, investing globally in biodiversity and natural ecosystems will also enable the EU to deliver its commitments to achieving the Sustainable Development Goals (SDGs). [8] Successfully achieving the 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 goals related to poverty alleviation, food security, sustainable agriculture and fisheries, health, economic development, peace and security, and climate change mitigation and adaptation. [9]

In light of the evaluation process of the EU 2020 Biodiversity Strategy and the current discussions on the post-2020 EU Biodiversity Strategy, WCS EU presents here its evaluation of Target 6 (on tackling the global biodiversity crisis) of the current EU Biodiversity Strategy 2010 to 2020, before providing a set of recommendations for the post-2020 EU Biodiversity Strategy.

2. Evaluation of Target 6 of the EU 2020 Biodiversity Strategy 2010 - 2020

2.1. Evaluation of Areas Mentioned under Target 6

Action 17 - Reduce indirect drivers of biodiversity loss: The EU has largely failed to address the impact of its high levels of unsustainable consumption on biodiversity and forests in partner countries between 2010 and 2019. This is partly because the 2010 strategy failed to outline a comprehensive list of measures and actions for the different sectors involved, which is a necessary first step to address EU negative impacts on biodiversity and forests globally. Although the EU has long acknowledged its impact on tropical deforestation and forest degradation, it only very recently proposed measures to tackle this in a Communication published in 2019 [10], which is yet to be implemented. Further work is also needed across sectors and supply chains to ensure that EU consumption patterns and business operations do not degrade biodiversity and all natural ecosystems. As resource-rich nations with a significant global ecological footprint, the EU and its Member States should be striving towards net positive outcomes for biodiversity. This includes integrating biodiversity, including forest and marine ecosystems, into decision-making for supply chains and for investments in development projects by finance, extractive, agriculture, fisheries, energy and transport sectors.



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We acknowledge that the Commission has made some recent efforts to include text in Free Trade Agreements (FTAs) on wildlife, and specifically on wildlife trade, within the Trade and Sustainable Development (TSD) chapters, but these efforts have been somewhat ad-hoc. The Commission must ensure that a broader set of biodiversity issues, including both illegal and legal (but often unsustainable) wildlife trade, are dealt with effectively in all FTAs and not just some of them. A major weakness remains the lack of compliance measures for TSD chapters in contrast to the other FTA chapters. Non-compliance with the issues outlined in TSD chapters should have consequences, whether through trade restrictions or other sanctions, to encourage full compliance with TSD provisions. [11]

Action 18 - Mobilise additional resources for global biodiversity conservation: WCS EU welcomes the leadership shown by the European Commission's Directorate-General for International Cooperation and Development (DG DEVCO) in supporting initiatives for biodiversity conservation, including through the EU Biodiversity for Life Flagship Initiative. The European Commission is currently supporting the production of a number of ground-breaking in-depth studies including the 2016 study “**Larger than Elephants: inputs for an EU strategic approach to wildlife conservation in Africa**”[12] and the 2018 study “**Larger than Tigers: inputs for an EU strategic approach to biodiversity conservation in Asia**”[13]. A similar study, “**Larger than Jaguars**”, is also under development for Latin America. We also welcome a new DG DEVCO study on **the interaction between security and wildlife conservation in sub-Saharan Africa**. If fully implemented, the approach outlined in these studies could be game-changing for the future of biodiversity in partner countries but the current level of funding is insufficient to implement the recommendations of these studies. To have a strong impact on the ground there needs to be a significant step up in financial support from the EU and its Member States and other donors, dedicated to biodiversity.

In sum, we consider that development cooperation funding for biodiversity is an area in which the EU has taken action and considerable progress has been made in the past decade. This step in the right direction needs to be built on with a corresponding increase in the scale of financing within the new Multiannual Financial Framework (MFF) to tackle biodiversity loss globally in the coming years and decades. Although the EU has successfully increased the level of development cooperation for climate action during this period it is still failing to recognise the importance role played by natural ecosystems, particularly forests, in climate mitigation and adaptation. [14] **An opportunity is being missed therefore to invest in nature-based solutions as part of the EU's response to climate change.**





2.2. Gaps in the Current EU Biodiversity Strategy

One of the major threats to species, that of illegal and unsustainable wildlife trade, is not included in the current biodiversity strategy. In February 2016, the European Commission adopted a comprehensive Action Plan to tackle wildlife trafficking within the EU and to strengthen the EU's role in the global fight against these illegal activities. [15] This action plan ends in 2020, however, and it is important that continuation of this action plan is included under a strong policy framework so that outstanding and new actions are implemented to ensure that the EU maintains its global leadership role in continuing to fight against wildlife trafficking.

The current Strategy also fails to address the protection and conservation of global marine ecosystems and oceans, which is an area clearly requiring greater attention. It mentions the 2008 EU Marine Strategy Framework Directive but this only focuses on marine environment across Europe, particularly fisheries issues. A major gap is the limited attention given to broader and effective marine management and bycatch mitigation measures outside of Europe.

3. Recommendations for a Post-2020 EU Biodiversity Strategy

We present here a set of recommendations for inclusion under the external dimension of a new post-2020 EU Biodiversity Strategy, to step up the EU contribution to halting and reversing the global biodiversity crisis.

3.1. Reduce direct and indirect drivers of biodiversity loss, including by addressing the EU's global ecological footprint through a comprehensive set of actions that will reduce the negative impacts of EU consumption on global biodiversity and forests.

As mentioned, the EU has failed address the impacts of its **consumption on global biodiversity** over the last decade. This is partly due to the lack of a comprehensive set of actions in the current biodiversity strategy 2010 to 2020. The EU must therefore set out a comprehensive set of measures in the new strategy to address the negative impacts of various sectors such as agriculture and fisheries on biodiversity globally, through preventative measures to avoid impacts before they occur, and compensating for residual damage, leading towards net positive outcomes.

An important first step is to ensure that indicators relating to biodiversity loss and ecosystem integrity are included within the taxonomy being developed under the **EU Sustainable Finance** initiative to ensure that financial investments by European companies are not fuelling biodiversity loss in partner countries.





With regards to forests in particular, the EU needs to fully implement the newly published EU Communication on **protecting and restoring the world's forests**, through concrete actions, including new legislative measures. In particular, we recommend that the EU adopts new legislation that requires companies to conduct due diligence throughout their entire supply chain in order to identify, prevent and mitigate environmental and social risks, including for biodiversity and carbon benefits. [16] Due diligence requirements should also be placed on financial institutions to ensure that the finance and banking sectors are neither directly nor indirectly fuelling deforestation, forest degradation and biodiversity loss. These efforts should also be supported by increased financial and technical assistance to producer countries across the globe to support them in halting deforestation, forest degradation and conversion or degradation of natural ecosystems. **This must include support to protect the 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.** To best respond to the scale of the challenge, the EU should commit to creating a dedicated fund for forests under the new Neighbourhood, Development and International Cooperation Instrument (NDICI).

Furthermore, the EU needs to give higher priority to the **protection and conservation of global marine ecosystems** in the post-2020 EU Biodiversity Strategy. Beyond a focus on fisheries impacts, the EU should promote the sustainable management and protection of marine and coastal ecosystems, both within and outside of protected areas. This should include high biodiversity ecosystems such as coral reefs, and aim to achieve a more integrated approach to land/sea and ocean management. The EU should also work to establish and effectively manage Marine Protected Areas (MPAs), based on sound science and strong community and other stakeholder participation and support, with the goal of maintaining or recovering intact, functional marine ecosystems, while also ending overfishing, mitigating bycatch, and ensuring that all fisheries are sustainably and equitably managed. The EU needs to step up its efforts to ensure that its external fisheries partnership agreements promote sustainability and biodiversity conservation and are more accountable and transparent. This could partly be achieved by making documents publicly available, ensuring allowable catches are scientifically determined and reported on, and requiring vessels to carry independent observers. Furthermore, harmful subsidies should be removed and emphasis should be put on increasing the protection and conservation of coastal biodiversity (particularly fish and marine species threatened by extinction) and ensuring local livelihood benefits, including through the promotion of 'small-scale fisheries'.



Bull Shark. Credit: Emily Darling © WCS



3.2. Reflect international efforts to create synergies between commitments under the CBD and other related environmental conventions such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the Convention on the Conservation of Migratory Species of Wild Animals (CMS) and the UN Framework Convention on Climate Change (UNFCCC), through a comprehensive biodiversity framework at EU level.

Wildlife trafficking has become the fourth most lucrative criminal activity in the world and constitutes one of the most immediate threats to many species but is not included within the current biodiversity strategy, possibly because it is dealt with to some extent under EU engagement with the CITES and CMS conventions rather than the CBD. Wildlife is being bought and sold across the globe on an increasingly large scale, however, as pets, meat, and food, as medicine, furs, feathers, skins, and trophies. [17] The EU has an important role to play in addressing wildlife trafficking, as it constitutes a destination market, a hub for trafficking in transit to other parts of the world, as well as the source region for illegal trade in some species. [18] The EU must therefore ensure the continuation of the EU Action Plan against Wildlife Trafficking after 2020 and integrate this with an overarching post-2020 biodiversity framework which includes outstanding or new measures that build on the existing action plan. Whilst we commend DG DEVCO for the funding that was dedicated to fighting wildlife trafficking in the Action Plan, the amount allocated was still very limited for such a highly lucrative criminal activity, that is closely linked to other criminal behaviour, and more funding and resources need to be allocated towards tackling it. Outstanding and new actions on this issue that must be included within a new EU post-2020 biodiversity policy framework include:

- **Stepping up efforts to fight the illegal ivory trade** within the EU and implementing a total EU ivory ban on both raw and worked ivory to, from, and within the EU.
- **Reviewing and revising the EU Environmental Crime Directive** to ensure that EU Member States treat wildlife and forest crimes as having the status of serious crimes, as the EU has already committed to doing under the UN Convention against Transnational Organised Crime. [19] This would enable the issue to be given the resources and people it needs to be effectively tackled and would give the EU greater leverage in asking partner countries to prioritise the issue.



Confiscated ivory items. Credit: Julie Larsen Maher © WCS



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- **Including strong commitments in every future EU FTA** that will ensure the sustainability of trade in wildlife products and prioritising the discussion on TSD chapters in FTAs. Non-compliance should be associated with consequences, whether through trade or other sanctions so that partner countries comply more fully with TSD provisions.
- **Allocating future EU funding to tackling wildlife crime** at all points along the supply chain – at source, in transit, as well as at the demand side. Further funding is also required to implement the recommendations of the new DG DEVCO study on the interaction between security and wildlife conservation in sub-Saharan Africa.

A further important gap in the current biodiversity strategy is the lack of coherence between EU biodiversity commitments under the CBD and **climate action** under the UNFCCC. Whilst the EU has prioritised climate policies and finance since 2010, biodiversity has not received anything like the same level of attention and important opportunities are being missed. **Natural solutions, such as forest protection and restoration, are already available at the scale needed to deliver 30% of the climate solution needed by 2030 but receive less than 3% of climate funding and very little attention in global and EU climate policy discussions.** [20] Intact forests, peatlands and oceans, for example, help to mitigate the impact of climate change by absorbing carbon. In addition, ecosystem-based adaptation has been shown to provide an effective approach to climate change adaptation, for example, salt-marshes and mangroves can protect coastlines from storm surges, coastal erosion and flooding caused by sea level rise. The EU should therefore:

- **Assess the opportunities for nature-based solutions to deliver climate change policy objectives** and formulate a set of EU nature-based solution policies for climate action.
- **Expand the EU budget target for climate to ‘climate and environment’ and increase it to 50%** to ensure that natural ecosystems are also funded as a core contribution to achieving climate mitigation and adaptation.

3.3. Address the drivers of ecosystem degradation as well as deforestation within EU policies and funding through the adoption of targets and metrics that assess ecosystem intactness/integrity

A significant body of science now recognises that the **last intact ecosystems on earth**, both terrestrial and marine, are disproportionately important in tackling some of our most pressing global challenges. The nature of their intactness holds the key to why they carry an outsize impact on these values. They are globally irreplaceable for their contribution to climate change mitigation potential, biodiversity, ecosystem services, sustaining imperilled cultures, and their resilience in the face of climate change are often highly threatened. [21] It is important to recognise the value of such areas whilst they are still intact, as protective action is the most cost-effective response. In particular, a large proportion of the last intact forests (35%) are owned or managed by Indigenous Peoples. 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 their efforts to protect and manage these areas, which the EU should play a role in addressing.



WCS is part of a scientific consortium with the University of Queensland, Oxford and Maryland, and the World Resources Institute and WWF, that is working to develop a global framework metric for measuring ecosystem integrity/intactness, beginning with an index of forest health. **Such a metric could be adapted to help the EU monitor forest degradation which is currently not monitored.** The EU Eurostat report (Eurostat 2017) reporting on the measurements of EU progress on achievement of the SDGs, for example, does not include any measurement of EU impacts on global deforestation or forest degradation, which is a major gap. A global index of forest health will present a holistic indicator of the degree to which a forest ecosystem has or has not been degraded by human action for the entire global forest estate at a high resolution. This will (i) make the scale, intensity and location of forest degradation visible and intuitively understandable to key audiences, raising their awareness of the need to find solutions and (ii) will offer a practical framework for setting quantifiable targets and measuring progress, helping to ensure that policy action on degradation becomes more feasible. It will therefore provide a way of ensuring that implementation of the EU Communication on Forest Protection and Restoration considers forest degradation as well as deforestation. **Furthermore, the proposal for a global metric on ecosystem integrity/intactness is now gaining momentum within the CBD discussions.**

We therefore urge the EU to recognise the importance of action to protect the world's last remaining intact ecosystems, particularly forests and marine ecosystems, in its new Biodiversity Strategy and adopt targets and metrics on achieving ecosystem integrity, including for forests, both to ensure finance is directed towards these areas and also to ensure they are no longer negatively impacted by EU trade and consumption patterns. Other metrics could also move towards more aspirational targets of net positive outcomes for nature.



Mangrove forest in Kenya. Credit: Julie Larsen Maher © WCS



3.4. Further link the biodiversity and health policy agendas

Climate change and biodiversity loss, if left unmitigated, will reverse and undermine the **global public health** gains made during past 50 years. Addressing these two issues constitutes the biggest global health opportunity of this century. 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 – ecological health and intactness – underpin global human health and health is an important way of engaging the public in conservations around nature conservation. While the links between climate change and health are being extensively explored and effectively communicated, the links between biodiversity loss and health remain largely unexplored. The EU should therefore further explore the gains to be achieved from linking the biodiversity and health policy agendas, for example, through the **development of a new EU strategy on wildlife, livestock, human and ecosystem health**.

3.5. Substantially increase funding for global biodiversity conservation, including for the conservation of marine, forest and all other natural ecosystems

The EU, together with its Member States, is the largest donor of development aid in the world [22] but the proportion of European Commission development aid that supports biodiversity-related projects only represents around 2% of the overall EU development aid budget. **Building on the excellent EU Biodiversity for Life Flagship Initiative, the EU should significantly step up its funding in the new 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. [23] This scale of funding is needed to implement the recommendations of the ground-breaking 2016 study “Larger than Elephants: inputs for an EU strategic approach to wildlife conservation in Africa”, the 2018 study “Larger than Tigers: inputs for an EU strategic approach to biodiversity conservation in Asia”, the forthcoming study “Larger than Jaguars” for Latin America, and the new DG DEVCO study on the interaction between security and wildlife conservation in sub-Saharan Africa.

The EU post-2020 biodiversity strategy should also provide a clear framework for EU action to ensure that a robust and effective global framework for biodiversity conservation is adopted under the CBD to attain the 2050 vision, including through enhanced international cooperation and improved resource mobilisation from the private sector and other donors.



Radiated tortoise in Madagascar. Credit: Julie Larsen Maher © WCS



Summary of recommendations for a Post-2020 EU Biodiversity Strategy

- **Reduce direct and indirect drivers of biodiversity loss**, including by addressing the EU's global ecological footprint through a comprehensive set of actions that will reverse the negative impacts of EU consumption on global biodiversity and forests:
 - **Set out a comprehensive set of measures to address the negative impacts** of various sectors on biodiversity globally, through preventative measures, and restoration, leading towards net positive outcomes.
 - Ensure that indicators relating to biodiversity loss and ecosystem integrity are included within the taxonomy being developed under the **EU Sustainable Finance** initiative.
 - Fully implement the newly published EU Communication on **protecting and restoring the world's forests**, through concrete actions, including new legislative measures. In particular, we recommend that the EU adopts new legislation that requires companies to conduct due diligence throughout their entire supply chain in order to identify, prevent and mitigate environmental and social risks, including for biodiversity and carbon benefits.
 - Give higher priority to the **protection and conservation of global marine ecosystems**. Beyond a focus on fisheries impacts, the EU should promote the sustainable management and protection of marine and coastal ecosystems, both within and outside of protected areas. This should include high biodiversity ecosystems such as coral reefs, and aim to achieve a more integrated approach to land/sea and ocean management.
- **Reflect international efforts to create synergies between commitments under the CBD and other related environmental conventions**, through a comprehensive biodiversity framework at EU level:
 - **Stepping up efforts to fight the illegal ivory trade** within the EU and implementing a total EU ivory ban on both raw and worked ivory to, from, and within the EU.
 - **Reviewing and revising the EU Environmental Crime Directive** to ensure that EU Member States treat wildlife and forest crimes as having the status of serious crimes.
 - **Including strong commitments in every future EU FTA** that will ensure the sustainability of trade in wildlife products and prioritising the discussion on TSD chapters in FTAs.
 - **Allocating future EU funding to tackling wildlife crime** at all points along the supply chain.
 - **Assess the opportunities for nature-based solutions to deliver climate change policy objectives** and formulate a set of EU nature-based solution policies for climate action.
 - **Expand the EU budget target for climate to 'climate and environment' and increase it to 50%** to ensure that natural ecosystems are also funded as a core contribution to achieving climate mitigation and adaptation.



- **Address the drivers of ecosystem degradation as well as deforestation within EU policies and funding** through the adoption of targets and metrics focused on achieving ecosystem intactness or integrity:
 - Recognise the importance of action to **protect the world's last remaining intact ecosystems**, particularly forests and marine ecosystems, in its new Biodiversity Strategy.
 - **Adopt targets and metrics on achieving ecosystem integrity**, including for forests, both to ensure finance is directed towards these areas and also to ensure they are no longer negatively impacted by EU trade and consumption patterns. Other metrics could also move towards more aspirational targets of net positive outcomes for nature.
- Further explore the gains to be achieved from **linking the biodiversity and health policy agendas**, for example, through the development of a new EU strategy on wildlife, livestock, human and ecosystem health.
- **Substantially increase funding for global biodiversity conservation**, including for the conservation of marine, forest and all other natural ecosystems:
 - Implement the recommendations of the ground-breaking 2016 study “**Larger than Elephants**: inputs for an EU strategic approach to wildlife conservation in Africa”, the 2018 study “**Larger than Tigers**: inputs for an EU strategic approach to biodiversity conservation in Asia”, the forthcoming study “**Larger than Jaguars**” for Latin America, and the new DG DEVCO study on **the interaction between security and wildlife conservation in sub-Saharan Africa**.
 - Create a dedicated fund for forests under the new Neighbourhood, Development and International Cooperation Instrument (NDICI).
 - Provide a clear framework for EU action to ensure that a **robust and effective global framework for biodiversity conservation is adopted under the CBD** to attain the 2050 vision, including through enhanced international cooperation and improved resource mobilisation from the private sector and other donors.



Jaguar in Ecuador. Credit: Julie Larsen Maher © WCS



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About WCS EU

The mission of WCS EU, based in Brussels, Belgium, is to save wildlife and wild places worldwide through science, conservation action, education, and inspiring people to value nature. To achieve our mission, we draw upon the WCS's global field expertise and experience to identify, formulate, and articulate policy positions on issues such as wildlife trade and wildlife trafficking, integrating the conservation of wildlife and wild places into the European Union's development aid programmes, and sharing this information with decision-makers.

For further information, please contact:

Janice Weatherley-Singh, Director, EU Strategic Relations, WCS EU, jweatherleysingh@wcs.org
Arnaud Goessens, Senior Manager, EU Policy, WCS EU, agoessens@wcs.org

Website: brussels.wcs.org

Twitter: [@WCSBrussels](https://twitter.com/WCSBrussels)

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