



Public consultation on EU biodiversity policy initiatives:  
Evaluation of the EU Biodiversity Strategy to 2020

**WCS EU Submission**  
**April 2021**

WCS EU welcomes this opportunity to take part in the public consultation on EU biodiversity policy initiatives, particularly on the evaluation of the EU Biodiversity Strategy to 2020. WCS EU is a Belgian NGO affiliated with the Wildlife Conservation Society (WCS), a global NGO working to deliver wildlife conservation programmes in over 60 countries, in Africa, Asia, the Pacific and the Americas. As WCS EU draws upon WCS's global field expertise and experience in formulating policy recommendations we only focus on the external dimension of the biodiversity strategy to 2020.

**Evaluation of Target 6 in the EU Biodiversity Strategy 2010 - 2020**

Target 6 in the EU biodiversity strategy 2010 to 2020 focused 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 the European Commission's Directorate-General for International Partnerships - DG INTPA (formerly Directorate-General for International Cooperation and Development – 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.

**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<sup>1</sup>, 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

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<sup>1</sup> European Commission, 2019. Stepping up EU Action to Protect and Restore the World's Forests, COM(2019)352 Final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1565272554103&uri=CELEX:52019DC0352>

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.

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.<sup>2</sup>

### **Action 18 - Mobilise additional resources for global biodiversity conservation**

WCS EU welcomes the leadership shown by DG INTPA (formerly 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'<sup>3</sup> and the 2018 study '**Larger than Tigers**: inputs for an EU strategic approach to biodiversity conservation in Asia'<sup>4</sup>. A similar study, '**Larger than Jaguars**', is also under development for Latin America. We also welcome the European Commission's '**Study on the interaction between security and wildlife conservation in sub-Saharan Africa**'.<sup>5</sup> 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.

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

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<sup>2</sup> WCS, 2017. WCS response to the DG Trade non-paper on Sustainable Development in EU Free Trade Agreements (FTAs). <https://library.wcs.org/Portals/0/Brussels/WCS-TSD-chapter.pdf?ver=2017-09-21-102451-950>

<sup>3</sup> European Commission, 2016. Larger than Elephants: Inputs for an EU Strategic Approach to Wildlife Conservation in Africa. [https://ec.europa.eu/europeaid/file/48902/download\\_en?token=yfd31oT](https://ec.europa.eu/europeaid/file/48902/download_en?token=yfd31oT)

<sup>4</sup> European Commission, 2018. Larger than Tigers: Inputs for a strategic approach to biodiversity conservation in Asia. [https://ec.europa.eu/europeaid/file/58290/download\\_en?token=SeB2\\_owm](https://ec.europa.eu/europeaid/file/58290/download_en?token=SeB2_owm)

<sup>5</sup> European Commission, 2019. Study on the interaction between security and wildlife conservation in sub-Saharan Africa. <https://op.europa.eu/en/publication-detail/-/publication/53ed0515-de76-11e9-9c4e-01aa75ed71a1/language-en>

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. We strongly support the development of similar initiatives for other regions.

As guardians of traditional knowledge, it is critical to further engage and increase support to secure the rights of **Indigenous Peoples and local communities (IPLCs)** in biodiversity conservation. We therefore encourage the EU to take leadership and continue to work closely with governments around the world in recognising the contribution 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.

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. We call on the EU to make additional efforts to reach **at least 10% annual spending on biodiversity under the new Neighbourhood, Development and International Cooperation Instrument (NDICI)**. Such a target would support the implementation of the compromise on the longterm EU budget, adopted on the 10th November 2020, which states that a target of 7.5% annual EU spending should be dedicated to biodiversity objectives from 2024, and 10% from 2026.<sup>6</sup> 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.<sup>7</sup>

### **Gaps in the EU Biodiversity Strategy to 2020**

The biodiversity strategy to 2020 missed an opportunity to link the biodiversity and health policy agendas. In 2004, with the publication of the Manhattan Principles, WCS launched the modern **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) and others (and sometimes under other names, such as Planetary Health). The Principles, updated in 2019 as the Berlin

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<sup>6</sup> European Parliament, November 2020. Compromise on long-term EU budget: EP obtains €16 billion more for key programmes. Press release [www.europarl.europa.eu/pdfs/news/expert/2020/11/press\\_release/20201106IPR91014/20201106IPR91014\\_en.pdf](http://www.europarl.europa.eu/pdfs/news/expert/2020/11/press_release/20201106IPR91014/20201106IPR91014_en.pdf)

<sup>7</sup> Weatherley-Singh, J., Gupta, A., 2018. “Embodied deforestation as a new EU policy debate to tackle tropical forest loss: Assessing implications for REDD+ performance, *Forests*, 9, (12), 751.

Principles<sup>8</sup>, discuss global health challenges at the nexus of human, animal, and ecosystem health. The current COVID-19 pandemic, but also other disease outbreaks of zoonotic origin such as SARS and Ebola, show to the world the importance of applying the One Health approach, as a matter of urgency. WCS developed a document with several recommendations on how the EU Biodiversity Strategy to 2030 can help reduce the risk of pandemics of zoonotic origin.<sup>9</sup>

One of the major threats to species, that of **illegal and unsustainable wildlife trade**, was not included in the biodiversity strategy to 2020. 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.<sup>10</sup> This action plan ended in 2020, however, and we welcome that continuation of this action plan is included under the new EU Biodiversity Strategy to 2030 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 Strategy to 2020 also failed 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.

We provided extensive recommendations for the new EU Biodiversity to 2030, available at: <https://brussels.wcs.org/Portals/0/Brussels/WCS%20-%20EU%20BD%20Strateg.pdf?ver=2020-07-03-085058-610>; and specific recommendations on how the EU Biodiversity Strategy to 2030 can help reduce the risk of pandemics of zoonotic origin, available at: <https://brussels.wcs.org/Portals/0/Brussels/WCS-ENVI-hearing.pdf?ver=2021-01-07-211640-147>

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<sup>8</sup> Gruetzmacher, K., Karesh, W. B., Amuasi, J. H., Arshad, A., Farlow, A., Gabrysch, S., ... & Walzer, C. (2021). The Berlin principles on one health—Bridging global health and conservation. *Science of the Total Environment*, 764, 142919. [www.sciencedirect.com/science/article/pii/S0048969720364494](http://www.sciencedirect.com/science/article/pii/S0048969720364494)

<sup>9</sup> WCS, 2021. WCS recommendations on how the EU Biodiversity Strategy to 2030 can help reduce the risk of pandemics of zoonotic origin. <https://brussels.wcs.org/Portals/0/Brussels/WCS-ENVI-hearing.pdf?ver=2021-01-07-211640-147>

<sup>10</sup> European Commission 2016. EU Action Plan against Wildlife Trafficking. [https://ec.europa.eu/environment/cites/trafficking\\_en.htm](https://ec.europa.eu/environment/cites/trafficking_en.htm)