



Public Consultation on the Update of the Belgium National Biodiversity Strategy to 2030

24th September 2024

Introduction

The update of the National Biodiversity Strategy¹ aims to align Belgium's goals with the Kunming-Montreal Global Biodiversity Framework (KM-GBF) and the European Biodiversity Strategy 2030. It is an important step towards enhancing Belgium's commitment to biodiversity conservation, restoration, and sustainable use.

The following is the response of WCS EU, a Belgian NGO affiliated to the Wildlife Conservation Society (WCS), based in Brussels. WCS is an international non-governmental organization that has been working across the globe for more than 125 years to save wildlife and wild places. WCS has the largest and longest-standing field conservation programme in the world. WCS has active conservation programmes in more than 50 countries that work in partnership with governments, Indigenous Peoples, local communities, other conservation organizations, academia, the private sector, and other stakeholders on science- and evidence-based conservation efforts. To learn more about WCS, please visit [wcs.org](https://www.wcs.org). For more on our engagement with the Convention on Biological Diversity (CBD) and the KM-GBF, please visit www.wcs.org/cbd.

WCS EU appreciates this opportunity to provide feedback on the Update of the Belgian National Biodiversity Strategy and commends the Belgian Government for their leadership and active role in CBD meetings and in translating global commitments into domestic policy.

We recognise the importance of all the objectives in the strategy but have restricted our comments to those areas where we have the most expertise to offer.

Objective 1: Identify and monitor the elements of biodiversity in Belgium

1.2 Align biodiversity monitoring strategies with European and international guidelines and strengthen collaboration between regions (p.39)

WCS EU Comments: *The degradation of nature is exacerbating three existential crises facing humanity: biodiversity collapse, climate change, and the persistent threat of zoonotic diseases to human and animal health. The health of nature can be defined by ecological integrity – or the structure, function, and composition of ecosystems and their biodiversity relative to a natural state or another baseline of holistic functionality. Ecosystems with high ecological integrity act*

¹ <https://www.health.belgium.be/en/node/45853>

as a critical buffer against all three of these three interrelated crises; we therefore must invest in efforts to expand and conserve the areas of high ecological integrity around the world. Setting clear, actionable targets is essential for achieving this goal. In this context, we encourage Belgium to include a commitment to identify high integrity ecosystems and monitor and conserve their ecological integrity. While there is no universal methodology for determining coverage of national territory under spatial planning, we recommend the use of freely available tools, including those integrating data on threats to biodiversity and their current status such as the Forest Landscape Integrity Index,² to identify areas of high ecological integrity as part of spatial planning and critical to implementation of the Kunming-Montreal Global Biodiversity Framework.

Objective 2: study, monitor and remedy the main direct drivers of biodiversity loss

2.2. Eliminate all forms of overexploitation, illegal, unsustainable, dangerous harvesting, wildlife trade, and study and monitor the impact of their overexploitation on biodiversity and ecosystem services (p.41)

WCS EU Comments: *We welcome this section, particularly the reference to implementing the revised EU Action Plan against wildlife trafficking, and the emphasis on the critical importance of compliance with and implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The fight against wildlife trafficking remains a pressing global issue, and we urge Belgium and the EU to continue playing a proactive role in ensuring the full and effective implementation of both the EU Action Plan and CITES Decisions and Resolutions. This is vital for combating wildlife trafficking and ensuring that any wildlife use and trade involving the EU, including Belgium, remains both legal and sustainable.*

In addition, we appreciate the acknowledgment of the EU Deforestation Regulation, which we note addresses both deforestation and forest degradation (i.e., Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010). Given the regulation's scope, we recommend incorporating the term "forest degradation" alongside "deforestation" in this section, to fully reflect the regulation's dual focus and ensure consistency in addressing both challenges.

² <https://www.forestintegrity.com>

Objective 3: Protect, maintain and restore biodiversity and ecosystem services in Belgium to a favorable conservation status

3.7 Reduce the loss of areas of high importance for biodiversity, including ecosystems of high ecological integrity, to near zero (p.56)

WCS EU Comments: We welcome this section, and particularly sub-objective 3.7. Ecosystems with high ecological integrity act as a critical buffer against the three existential crises facing humanity: biodiversity collapse, climate change, and the persistent threat of zoonotic diseases to human and animal health. We therefore must invest in efforts to expand and conserve the areas of high ecological integrity around the world. Given the very few areas remaining of high ecological integrity, we would urge Belgium to increase the ambition of this sub-objective and reduce their loss to “zero” rather than “near zero”. We welcome the leadership shown in promoting discussions on ecological integrity and call on Belgium to also encourage other countries to adopt and implement similar targets that aim to reduce the loss of areas of high importance for biodiversity, including ecosystems of high ecological integrity, to zero.

Objective 4: Ensure the sustainable use of elements of biodiversity and the full integration of biodiversity and its multiple values in all sectors, in particular agriculture, forestry, fisheries, aquaculture, finance, tourism, health, manufacturing, infrastructure, energy and mining

4f.2 Ensure that the links between biodiversity and health are widely recognized, valued and reflected in national public health and biodiversity strategies, and further integrate the “One Health” approach (p.72)

WCS EU Comments: We welcome this section and would like to reemphasize the critical importance of applying an integrated One Health approach across sectors. We commend Belgium for its leadership on this issue, particularly through its active engagement in initiatives such as PREZODE (Preventing ZOonotic Disease Emergence). In November 2023, mandated at the ministerial level, the Belgian PREZODE Expert Group, with support from the Belgian Biodiversity Platform, FPS Health, Food Chain Safety and Environment, and Sciensano, developed a set of key policy recommendations as part of a national ‘One World One Health’ Vision for Belgium with a focus on the emergence of zoonotic diseases. We therefore recommend including in the Update of the Belgium National Biodiversity Strategy to 2030, specific language that supports the implementation of Belgium's 'One World One Health' policy recommendations.³

³ <https://www.biodiversity.be/6011/>

Objective 5: Integrate biodiversity throughout society and relevant sectoral policies (p.73)

*WCS EU Comments: We welcome this section and re-emphasise the importance of more effectively integrating biodiversity throughout relevant sectoral policies, in particular climate and trade policies. In particular, **maintaining and restoring ecological integrity should be recognised as critical to climate change mitigation and adaptation efforts**. Furthermore, we appreciate the inclusion of language emphasising the need to reduce the global consumption footprint in an equitable manner. Finally, we welcome the sub-objective on promoting and supporting stakeholder involvement through partnerships at all levels of biodiversity decision-making.*

Objective 6: Ensure the fair and equitable sharing of benefits arising from the use of genetic resources and digital sequencing information on genetic resources, and facilitate appropriate access to genetic resources and foster a significant increase in shared benefits.

6.3 By 2030, create operational mechanisms to protect the knowledge, innovations and practices of indigenous and local communities embodying traditional lifestyles relevant to the conservation and sustainable use of biodiversity (p.84)

*WCS EU Comments: We welcome this section, in particular Belgium's commitment to support the participation of representatives of Indigenous Peoples and local communities in appropriate forums and to integrate the preservation and sharing of traditional knowledge into Belgian development cooperation or scientific cooperation in projects. More generally, **we encourage Belgium to support initiatives that strengthen the rights of Indigenous Peoples under the UN Declaration on the Rights of Indigenous Peoples to manage their lands and natural resources that they have traditionally owned, used or occupied, including direct funding to Indigenous Peoples' groups.***

Objective 8: Improve and communicate scientific knowledge on biodiversity and ecosystem services

8.5 Improve the science-policy interface linked to biodiversity and promote stakeholder participation (p.92)

*WCS EU Comments: In line with the goal of strengthening the science-policy interface and promoting stakeholder participation, **we recommend that the Belgian Government establish a dedicated Belgian stakeholder consultation group.** This group would enable ongoing dialogue and collaboration between the government, scientific community, conservation organizations, and other key stakeholders. WCS EU would be pleased to actively participate in such a group,*

contributing to efforts that ensure the effective implementation of biodiversity goals, targets, and policies.

Objective 11: Ensure consistent implementation of commitments and agreements related to biodiversity and among themselves

11.2 All cooperation projects on climate change, biodiversity and desertification financed by Belgium should be evaluated to ensure that they mutually support the objectives of the three Rio conventions (p.100)

WCS EU Comments: We welcome this section and we're encouraged to see that Belgium is prioritizing the integration of the Rio Conventions, recognizing the interconnectedness of climate change, biodiversity, and desertification. In particular, maintaining and restoring ecological integrity is critically important as a measure to address the interlinked biodiversity, climate, and health crises. We recommend that in addition to the Rio Conventions, priority be given as well to cooperation in other biodiversity conventions, particularly the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Convention on the Conservation of Migratory Species of Wild Animals (CMS).

Objective 12: Strengthen Belgium's international cooperation for the protection of biodiversity (p.100)

WCS EU Comments: The preservation of biodiversity globally and of high-integrity ecosystems are critical to achieving the objectives set out in the EU Green Deal, the Kunming-Montreal Global Biodiversity Framework, and the Sustainable Development Goals (SDGs). A failure to take a holistic approach to these issues risks compromising the benefits of international cooperation across key sectors such as food security, health, sanitation, economic development, job creation, and the resilience of Indigenous Peoples and local communities. Belgium has historically not allocated a significant portion of its development cooperation funds to biodiversity. This is despite other donors recognising investments in biodiversity as being critical to achieving the SDGs and the Paris Agreement climate goals. To align with global efforts, we urge Belgium to make the protection of biodiversity a key priority in its international cooperation and to adopt a spending target similar to the EU's, dedicating at least 10% of annual spending,⁴ including through its Official Development Assistance (ODA), to initiatives that benefit biodiversity globally.

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https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/horizontal-priorities/green-budgeting/biodiversity-mainstreaming_en#how-much-do-we-spend

Objective 13: Ensure active and effective engagement in biodiversity-related conventions and forums at international and European levels

13.3 Actively engage in the establishment of new international treaties with a positive impact on biodiversity (p.105)

WCS EU Comments: *WCS EU commends the Belgian Government for their leadership and active role in biodiversity-related conventions and forums at international and European levels. Given the leadership shown by Belgium, in the area of One Health in particular, we urge Belgium to continue advocating for an ambitious WHO instrument to strengthen pandemic prevention, preparedness and response.⁵ It is critical that this once-in-a-generation agreement includes provisions that will truly reduce the risk of pathogen spillovers, epidemics, pandemics, and the emergence and reemergence of diseases at the human-animal-environment interfaces from happening in the first place, referred to as pandemic prevention at source.⁶*

Objective 14: Ensure full, equitable, inclusive and effective representation and participation of various communities in the context of biodiversity conservation and decision-making in this area (p.105)

WCS EU Comments: *Equitable and inclusive participation and decision-making is key to sustainable biodiversity conservation. This section is fully relevant but its operational application could be more ambitious as it is currently limited to gender equality at the national level. We recommend the addition of an operational objective to include full, equitable, inclusive and effective participation of communities as a key element of the projects supported by Belgium's Official Development Assistance (ODA). This includes considering gender, but also minority or marginalised groups such as Indigenous Peoples, youth, elderly or disabled people.*

Objective 15: Significantly and progressively increase the mobilization of financial resources from all sources, including national, international, public and private resources, in an efficient and easily accessible manner

15.6 Increase the total amount of international financial resources related to biodiversity from developed countries, including official development assistance (p.112)

WCS EU Comments: *Biodiversity is central to global efforts to address climate change, and inadequate financing for biodiversity will significantly hinder Belgium's ability to meet both its climate and biodiversity goals. The preservation of biodiversity globally and of high-integrity ecosystems in particular are critical to achieving the objectives set out in the EU Green Deal, the Kunming-Montreal Global Biodiversity Framework, the Paris Agreement on climate change, and*

⁵ <https://inb.who.int/>

⁶ <https://www.wcs.org/our-work/pandemic-prevention-at-source>

*the Sustainable Development Goals. **We therefore urge Belgium to significantly increase their global biodiversity financing** to match the leadership Belgium has shown during global treaty negotiations and at the policy-making level.*

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