

To

**Frans Timmermans**  
**Executive Vice-President of the European Commission**  
**European Green Deal**

**Virginijus Sinkevičius,**  
**Commissioner for Environment, Oceans and Fisheries**

**Rue de la Loi / Wetstraat 200**  
**1000 Brussels**

14 December 2021

**Subject: EU Nature Restoration Law**

Dear Vice-President Timmermans, Dear Commissioner Sinkevičius,

**We are writing to you to raise our concerns regarding the overall ambition of the EU Nature Restoration Law (NRL) which is in the final stages of preparation by the European Commission. We are strongly convinced that clear, measurable targets for land area, river length and sea area are the key elements to make this legislation as ambitious, fit-for-purpose, and effective as possible. These measurable targets should reflect the level of political priority given to this file through the European Green Deal. EU biodiversity is in a terrible state and the NRL can offer solutions to the interlinked climate and biodiversity crises.**

A proposal based on targets formulated as a percentage of “degraded area”, based on Member States’ assessments as part of their Article 17 reporting obligations under the EU Habitats Directive would be insufficient. As it stands, the reporting of Member States is not comprehensive, has many data gaps (with the condition of significant percentages of habitats and species listed as “unknown”) and therefore, underestimates the restoration efforts needed to put biodiversity on a path to recovery by 2030. As it stands, it leaves room for interpretation and inaction, as it is unclear how much land, river length and sea area would need to be restored and to what degree.

Therefore, we are strongly convinced that only numerical targets referring to the whole EU land area, river length and sea area can provide a real drive for biodiversity and climate, and create legal certainty for speedy and effective implementation. Just as with the EU Climate Law, a robust and understandable EU headline target that overarches the individual ecosystems (and species) specific targets is indispensable in order to mobilise Member States’ action at the required scale and helps bring civil society on board. Additionally, it can facilitate the monitoring of individual Member States’ contributions, thus ensuring the timely achievement of the EU-wide targets

As NGOs, we advocate for a target to restore at least 15% of the EU land and sea area, as well as river length by 2030, to which all underlying ecosystem specific targets should contribute. That would mean restoring 650,000km<sup>2</sup> of land, 1,000,000km<sup>2</sup> of marine EU area and 178,000km of rivers.

Adding such clear and meaningful overall targets as a specific article in the proposed new law would express the political commitment that you have powerfully and repeatedly articulated in your speeches in various instances and fora.

We hope that your decisions in the final consultations on the NRL will put Europe on a path of nature recovery which is in the interest of all European citizens and future generations.

Thank you for taking our recommendations into account in your deliberations.

Yours sincerely,

Undersigned organisations:





European Environmental Bureau

BirdLife Europe and Central Asia

WWF European Policy Office, on behalf of the WWF European network

Client Earth

CEEweb for Biodiversity

Natuurmonumenten

Intl Assn of River Keepers Eco-TIRAS (Moldova)

Naturefriends International

Seas At Risk

Coordinamento Nazionale Tutela Fiumi Free Rivers Italia

BUND e.V. (Friends of the Earth Germany)

Natuurpunt vzw (Flanders - Belgium)

Eko-zivot

Terra Cypria

Danish Society for Nature Conservation (Danmarks Naturfredningsforening)

Balkani Wildlife Society

Peraltrestrade Dolomiti (Italia)

Milvus Group - Bird and Nature Protection Association

Deutsche Umwelthilfe

Deutscher Naturschutzring (DNR)

Fundación Nueva Cultura del Agua

Swedish Society for Nature Conservation (SSNC)

NABU

Deutsche Stiftung Meeresschutz (DSM)

Oceana in Europe

Eko-Zivot

DEM

Inter-environnement Wallonie

Ostwind e. V.

North Sea Foundation

Latvian Fund for Nature

Czech Society for Ornithology

BIOM Association

Liga para a Protecção da Natureza (LPN)

Sociedad Española de Ornitología (SEO/BirdLife)

Italian Speleological Society SSI

Whale and Dolphin Conservation

Vogelbescherming Nederland

Naturalists Club Poland

Wetlands International, European Association

Youth and Environment Europe	Latvijas Ornitoloģijas biedrība	Quercus - Associação Nacional de Conservação da Natureza (Portugal)
GRÜNE LIGA e.V.	Fundacja Zielone Światło	BirdLife Sweden
Buglife - The Invertebrate Conservation Trust	Zielone Wiadomości	Generation Climate Europe
Rewilding Europe	Pro Wildlife	Mediterranean Institute for Nature and Anthropos (MedINA)
Irish Whale and Dolphin Group	VOICE Ireland	Riverwatch
Opolskie Towarzystwo Przyrodnicze (Naturalist Society of Opole Voivodeship)	BDBiol - Berufsvertretung Deutscher Biologen	Fundacja Hektary Dla Natury
Eurosite - the European Land Conservation Network	Michael Succow Stiftung, Partner in the Greifswald Mire Centre	Dodder Action, (Dublin, Ireland)
Polish Ecological Club	Natagora	Greenpeace
Croatian Society for Birds and Nature Protection	Bodensee-Stiftung (Lake Constance Foundation)	Society for the Protection of Prespa (Greece)
Iceland Nature Conservation Association	GEOTA	Tour du Valat
Lega Italiana Protezione Uccelli (LIPU)	Mammal Conservation Europe	PIM Initiative
CIPRA Italy	FUNDACIÓN GLOBAL NATURE	Hellenic Ornithological Society/BirdLife Greece
Brod Ecological Society-BED (Croatia)	Landesnatschutzverband Baden-Württemberg	Surfrider Foundation Europe
Stowarzyszenie Ekologiczne EKO-UNIA, Poland	Coastal Concern Alliance	Living Rivers Foundation
International Mire Conservation Group	SPEA - Sociedade Portuguesa para o Estudo das Aves	Verband Deutscher Sporttaucher (VDST)
Cork Nature Network	“Europe and We” Association, Bulgaria	German Kommission for Scientific Diving (KFT)
Macroom District Environmental Group	Global Nature Fund	International Fund for Animal Welfare (IFAW)
European Anglers Alliance	Polish Society for the Protection of Birds	Sustainable Water Network (SWAN)
natur&mwelt a.s.b.l	Eco-Union	Lithuanian Fund for Nature
Societas Europaea Herpetologica (SEH)	Podkarpackie Towarzystwo Przyrodników Wolne Rzeki	Cork Environmental Forum
FAPAS - Associação Portuguesa para a Conservação da Biodiversidade	Butterfly Conservation Europe	AG Geobotanik in SH&HH
Sciaena	Carra Mask Corrib Water Protection Group	Irish Peatland Conservation Council
Fundacja Strefa Zieleni	Latvian Environmental Protection Club (VAK)	Birdlife Estonia
Stepnicka Organizacja Turystyczna	Reptile, Amphibian Conservation Europe (RACE)	BOS+
	European Cave Protection Commission (ECPC)	BirdLife Cyprus
		Irish Wildlife Trust



Romanian Ornithological Society Association	Platforma pro krajinu (Platform for the Landscape)
A Rocha International	BirdLife Finland
Biodiversity Action Europe	Beleco
BirdLife Hungary	Dansk Ornitologisk Forening - BirdLife Danmark
Global Youth Biodiversity Network Europe	ZERO - Associação Sistema Terrestre Sustentável
Coalition for Rivers Czech Republic	Coalition Clean Baltic
SOS/BirdLife Slovakia	CIPRA Slovenia
BirdLife Austria	The Nature Conservancy
Amigos de la Tierra (Friends of the Earth Spain)	Lithuanian Ornithological Society
Miljøbevægelsen NOAH - Friends of the Earth Denmark	CIPRA International
MedWet	Calla - Association for Preservation of the Environment
Friends of the Earth Europe	The Green Tank
Legambiente Onlus Italy	Verband der deutschen Höhlen- und Karstforscher e.V.
Hnutí DUHA - Friends of the Earth Czech Republic	CIPRA Deutschland
Spolek Ametyst	EUROPARC Federation
Společnost pro trvale udržitelný život/Society for Sustainable Living	Fern
Western Center of the Ukrainian Department of International Center of Scientific Culture – The World Laboratory	
Friends of the Earth Cyprus	
Polish Ecological Club Pomeranian Branch	
Naturschutzgesellschaft Schutzstation-Wattenmeer e.V.	
Centro Ibérico de Restauración Fluvial	
Děti Země (Children of the Earth)	
Royal Society for the Protection of Birds (RSPB)	