

9th April, 2021

Open letter to Executive Vice Presidents and Commissioners

To:
Executive Vice-President Commissioner Valdis Dombrovskis
Executive Vice-President Commissioner Frans Timmermans
Commissioner Virginijus Sinkevičius

Re: Green Recovery not achievable without investing in nature under the Recovery and Resilience Facility

Dear Commissioners,

We are writing to you as a coalition of environmental NGOs who are deeply concerned over the lack of funding planned for nature and biodiversity within the EU's €672bn Recovery and Resilience Facility (RRF).

The European Union prides itself as a world leader in climate and environmental action and has committed to a series of ambitious targets, including climate neutrality by 2050. Just last year, EU leaders pledged their commitment to reverse biodiversity loss by 2030 in line with the new Biodiversity Strategy for 2030.

As Commissioners specifically working on climate and environmental matters, you play a key role in ensuring the EU's objectives and goals are reached. You have all expressed alarm over the failing health of nature and biodiversity, and have been outspoken on the urgent need to address this before it is too late. Just last year, Mr Timmermans stated during the Biodiversity Strategy for 2030 how *"by destroying nature at an unprecedented rate, and now with around 1 million species at risk of extinction within only decades, we literally threaten our own life, our health and our well-being"*

Now is the time to act on this concern to ensure that your words translate into concrete action. The Biodiversity Strategy for 2030 calls for EUR €20bn a year of investments in order to protect and restore nature and biodiversity. With Member States now having access to almost €700bn euros through the RRF, major parts of this effort can be realised already. The first step to this starts now; Member States must quantify and explain how the RRF will contribute to the implementation of the Biodiversity Strategy, and show how they will address the major gaps in nature and environmental legislation that has resulted in numerous ongoing infringement procedures.

The use of the RRF for achieving the EU's targets is particularly important in the Central and Eastern European region, where public investments are employed extensively to co-finance EU funds. Around 41% of all public investments come from EU funds and this means they significantly shape how money is spent in this region. In the context of the EU's recovery, the RRF will represent by far the largest

funding source available. In contrast to Germany for example,¹ every single euro coming from the RRF to this region of the Union will have an immense importance in revitalising the economy and potentially triggering a sustainable and environmentally conscient economic future.

Yet, this will not happen if the plans are approved in their current form. Our assessments show that almost no Member State is using the recovery funding to support nature conservation, most plans do not even include a single measure in this field. Instead, there are many proposals which would be highly harmful for biodiversity, with the same old grey infrastructure of the past resurfacing. The current Latvian plan proposes the replacement of unproductive forest stands and subsidies for commercial thinning, which in reality means also supporting clear-cutting. This forest management method is not only unsustainable but is actually damaging to the environment and nature. Clear-cuts release huge amounts of CO₂ captured in the trees, and can lead to the destruction of biodiversity-valuable forest stands and habitats of EU importance, leading to further biodiversity loss. The Polish government has the intention of spending parts of its budget to burn more forests in the name of “renewable energy”. The EU is already cutting more than 6 football fields per hour for wood-biomass in Europe, cutting millions of trees in protected forests. The Bulgarian plan proposes a huge hydro-melioration project which could threaten valuable wetland habitats, but no Strategic Environmental Assessment is foreseen. At a crucial time when we should be supporting restoration of habitats of European importance, we believe that such proposals completely conflict with the EU’s Biodiversity Strategy for 2030,

The magnitude of efforts under the RRF plans will set the direction of public finances for years to come and it is the role of the European Commission to ensure that every euro spent will let us come out better on top, with a green recovery that tackles the environmental and biodiversity crisis. Your scrutiny should not allow for loopholes, corruption and fraud. It should ensure that every project that the EU will finance will help achieve ambitious objectives of the European Green Deal and the EU’s Biodiversity Strategy for 2030.

Not only do we therefore urge you to operationalise the Do No Significant Harm (DNSH) principle properly and to align investments with the objectives of environmental policies, but also ensure investments are being made towards real nature restoration and conservation projects. This means full transparency over the specific investments intervention and DNSH assessments that are conducted, as well as allowing public scrutiny over the DNSH so as to guarantee good governance and sound enforcement of the principle. Nature conservation cannot be neglected and instead must be part of this recovery, notably through the restoration of ecosystems and their services on which our economy, our food and our health depend.

We therefore plea to the European Commission to stop business as usual. Instead, we ask that the European Commission thoroughly scrutinises all national RRF plans, and only accepts them where these will lead to a green recovery and help us achieve the climate and biodiversity ambition of the EU.

Yours sincerely,

¹EUR €29.3bn from the RRF out of a whole €130bn package, 22,5%.

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