

Needs and priorities for biodiversity funding: A comparative analysis of Hungary and Poland



Photo: CEE Bankwatch Network

Introduction

Biodiversity loss is occurring at an unprecedented rate in human history. In the EU, only 15 per cent of habitats and 27 per cent of species have a good conservation status, while an alarming 81 per cent of habitats are in poor or bad condition.

This is where EU biodiversity financing plays a crucial role, by funding key activities to protect what we still have and to restore what has been degraded. Member States do, however, face different challenges with regards to addressing biodiversity loss. In western Europe, there is a greater need for financing measures that restore biodiversity in areas where species and rich natural habitats have been degraded or lost, while in central and eastern Europe, the focus is generally on protecting and preserving the region's existing biodiversity. As such, financing needs differ, both across regions and between countries.

Financings needs for these activities are also increasing. Figures currently show that annual Natura 2000 financing needs have increased from EUR 4.9 billion in 2010 to

For more information

Branka Španiček
Strategic Area Leader Finance
and Biodiversity
CEE Bankwatch Network
branka.spanicek@bankwatch.org

Daniel Thomson
EU Policy Officer for Biodiversity
CEE Bankwatch Network
daniel.thomson@bankwatch.org

Rafal Rykowski
Biodiversity campaigner
Polish Green Network
rafalrykowski@zielonasiec.pl

Zsuzsanna Ujj
Biodiversity campaigner
MTVSZ - Friends of the Earth
Hungary
ujj.zsuzsanna@mtvsz.hu

Learn more: bankwatch.org



EUR 8.6 billion for the 2021–27 period. This represents a real increase in total funding needs of approximately 24 per cent since the previous assessment.¹

There are now a number of new opportunities to improve the provision and use of EU biodiversity financing, namely the recently adopted Nature Restoration Law, as well as the proposal for the next EU budget for the 2027–2034 period. These initiatives should provide a catalyst for increasing both the quality and quantity of financing for biodiversity.

This publication provides an overview of the priorities for national biodiversity needs in two countries – Hungary and Poland – two of the largest recipients of EU funds. It focuses on three main aspects: the current state of biodiversity in the country, the financing available, and the key areas that need this financing. A comparative analysis is then formed based on these assessments in order to identify best practices. Lastly, recommendations are provided to make the best use of available financing and ensure it is channelled into the key areas for tackling biodiversity loss.

Importance of EU biodiversity financing at the national level

Unlike for climate spending, individual EU-funded programmes do not require a certain percentage of earmarking for biodiversity expenditure. This means it is largely down to individual Member States and national managing authorities to determine the amounts they allocate to biodiversity-related measures, as well as the types of projects they wish to finance.

This is especially important given that two of the largest funding streams for biodiversity financing, the Common Agriculture Policy and the cohesion policy funds, operate via a process of shared management, meaning Member States have increased flexibility and control to use these funds as they see fit. Notably, biodiversity funding is allocated through a series of existing funds and programmes designed for delivering the EU's various sectoral objectives. However, this means that biodiversity has to compete for funding with other sectors, many of which receive greater political support from national governments.

There is a clear need to drastically increase spending for biodiversity. Estimates reveal a financing gap of EUR 19 billion a year from 2021 to 2030 (EUR 187 billion over the whole period) to implement the objectives of the EU's Biodiversity Strategy for 2030. Similarly, EU financing for funding the Natura 2000 network only meets around 20 per cent of spending needs.² Insufficient funding for nature conservation and restoration activities is therefore a key barrier for tackling biodiversity loss.

However, the problem also concerns poorly and inefficiently used financing, even when EU funding is available. In recent years, there have been several key opportunities to support biodiversity through EU funds. Unfortunately, they have been largely overlooked. The EU's EUR 700 billion Recovery and Resilience Facility saw almost no investments in biodiversity, particularly in central and eastern European Member States, while the 2021–2027 operational programmes allocated just EUR 7 billion out of the EUR 392 billion for the whole period.

¹ European Commission, [Investment needs and priorities for Natura 2000 and green infrastructure – EU-wide assessment based on Member States' prioritised action frameworks](#), *EUR-Lex*, 27 April 2023.

For the previous 2014–2020 period, the European Commission planned to spend 8.1 per cent of the EU budget (EUR 86 billion) on biodiversity, with 77 per cent of this amount (EUR 66 billion) sourced from the Common Agricultural Policy. Yet, the majority of this spending has had no direct positive impact on biodiversity.³ Financial allocations earmarked for nature restoration and conservation measures remain too low. In other words, although funding is available for Member States, it is not being channelled into activities for tackling biodiversity loss.

EU financing therefore plays a crucial role in national biodiversity funding, but is not utilised effectively. There is an increasing need for a more targeted approach to aligning available funding with priority areas. The following national sections outline where EU funding should be allocated.

How Hungary and Poland compare

Funding priorities

Hungary and Poland are the two largest recipients of EU funds. Therefore, given the substantial amounts available to these Member States, a comparison of their respective allocations for biodiversity provides valuable insights into their national spending priorities.

In both countries, the number of species and habitats categorised as having an unfavourable status are very high. The proportion of habitats classified as either unfavourable or bad is 86.7 per cent in Hungary and 78 per cent in Poland. The average across the EU is 81 per cent.

A comparison of the financing needs outlined in the prioritised action frameworks of both countries indicates that Poland's annual costs are EUR 689 million compared to just EUR 361 million for Hungary. The highest costs in both countries are associated with grasslands and woodlands, reflecting the high number of these habitat types requiring conservation efforts.

The management structure of Hungary's national park directorates shows that, on the one hand, implementation of nature-related projects is most effective when environmental authorities are given a mandate. On the other hand, the environmental sector has little influence or authority to positively influence the plans and programmes of other sectors.

In Poland, there is a systemic lack of transparency when developing important sectoral plans, particularly in relation to water and forestry. Water management plans, for example, are not transparent and forestry plans are exempted from obligations concerning the strict protection of species under EU regulations.

Problems with the use of funding

Both countries face similar challenges in effectively utilising EU funds. Managing authorities typically perceive EU funds as a replacement for, rather than a complement to, national and other funding sources. This approach is often used as a justification for decreasing national budget allocations, despite the inefficient use of EU funding and the very low amounts earmarked for this sector, as outlined below.

Another major barrier to improving biodiversity financing is the constant competition between sectors for funding, where the environment sector is usually deprioritised. This challenge is compounded by the lack of integration of biodiversity needs into other sectors and programmes.

In both Member States, the pervasive view that financing nature is solely the responsibility of the environment ministry. Yet without cross-sectoral support, activities in sectors such as transport, water management and agriculture can be highly damaging. Nevertheless, cooperation between environmental non-governmental organisations and the water sector has seen some progress in recent years, a positive development that should be encouraged and replicated in other countries and across sectors.

Direct targeted funding for nature conservation activities tends to be minimal, highly unpredictable, and reliant on project-focused financing, largely through the LIFE programme. Despite the availability of other funding streams, such as the cohesion policy and Common Agricultural Policy, they typically focus on secondary objectives like the greening of infrastructure projects, rather than direct investments in nature conservation that, for example, align with the prioritised action framework priorities. This leaves a significant gap when it comes to securing financing for measures under the prioritised action frameworks, which are typically hindered by a lack of guaranteed and consistent funding.



Nature conservation financing in Hungary

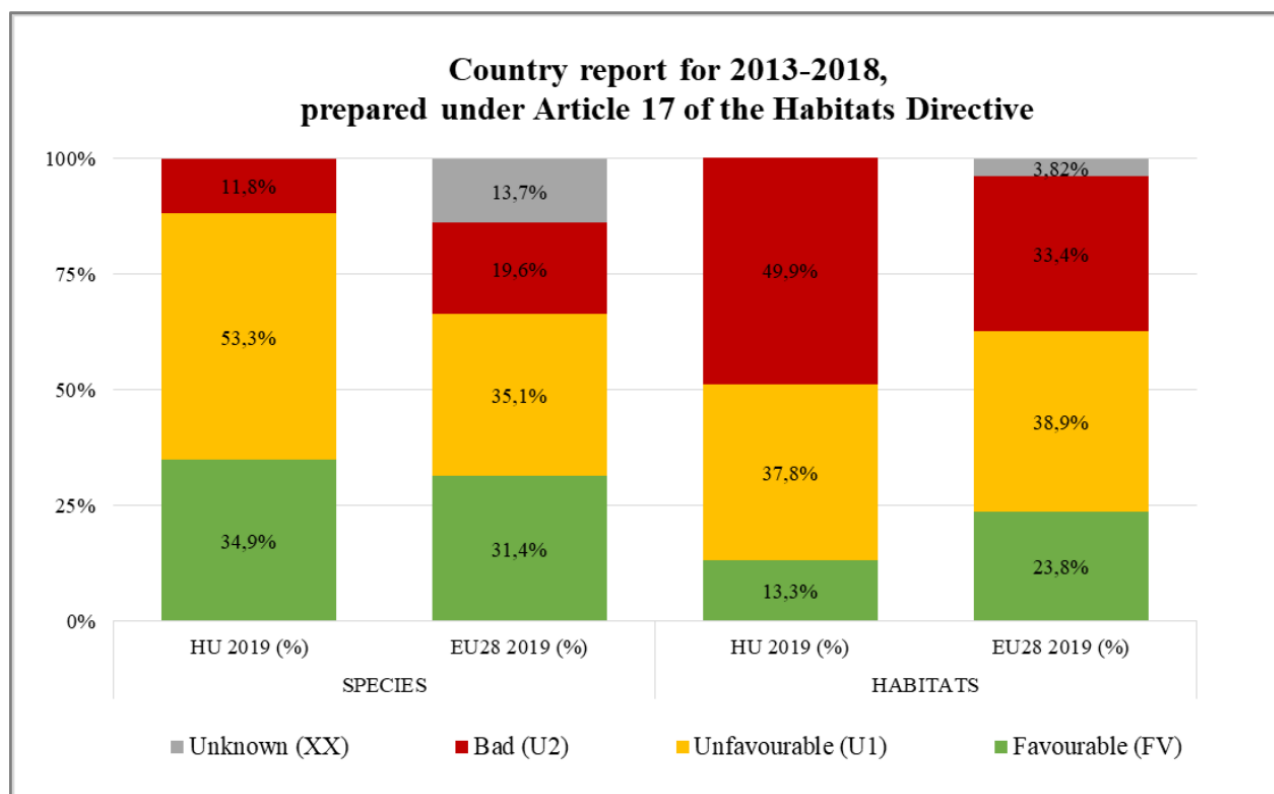
Current state of biodiversity in Hungary

The entirety of Hungary lies within the Pannonian biogeographical region, known for its diversity ranking just behind the Mediterranean and Alpine regions. The region is highly valued for its unique habitats and the rare species, particularly certain bird species, amphibians, and plants adapted to steppe and wetland ecosystems. However, current government policies have failed to effectively address biodiversity loss.

Recent scientific data-gathering initiatives have been successful in mapping the conservation status of all species and habitats in Hungary.² A 2019 report on the conservation status of natural resources (covering the 2013–2018 period) classified 13.33 per cent of habitats and 34.91 per cent of plant and animal species of community interest as having a favourable conservation status. Regarding changes since the 2007–2012 period, the conservation status of 168 species (79.24 per cent) remained unchanged, the status of 15 species (7.07 per cent) improved, and the status of 29 species (13.68 per cent) deteriorated.³

² Lechner Knowledge Center, Ministry of Agriculture of Hungary, [Nemzeti ökoszisztéma szolgáltatás-térképezés és értékelés \(NÖSZTÉP\)](#), Lechner Knowledge Center, Ministry of Agriculture of Hungary, accessed 31 August 2024.

³ Ministry of Agriculture of Hungary, [National Biodiversity Strategy for 2030](#), Ministry of Agriculture of Hungary, 8 August 2023.



Source: Ministry of Agriculture of Hungary, [National Biodiversity Strategy for 2030](#), Ministry of Agriculture of Hungary, 8 August 2023.

Hungarian context

Hungary is home to 10 national parks, each managed by one of the country’s 10 national park directorates (NPDs). The NPDs are responsible not only for the territories designated as national parks, but also for the surrounding landscapes. Within their operational remit, they oversee all other protected areas, including Natura 2000 sites and those inhabited by protected species. Collectively, the 10 operational areas cover the entire surface area of Hungary.

Within these jurisdictions, the NPDs oversee approximately 850,000 hectares of state-owned protected natural areas. However, they exercise direct management rights over only about 290,000 hectares. The remaining areas are managed by the National Land Fund, forestry companies, or other organisations.

Ninety per cent of Hungary’s protected areas are also part of the country’s Natura 2000 network, which is much larger than the areas protected under national law. Altogether 21.39 per cent of Hungary is protected, either under national legislation, as part of the Natura 2000 network, or both.⁴

Natura 2000 areas

Hungary’s unique administrative system, which grants NPDs jurisdiction (albeit limited in scope) over the country’s entire surface area, coupled with the existence of state-owned protected sites, provides a highly advantageous legal and administrative framework for implementing nature conservation goals.

⁴ Ministry of Agriculture, [National nature conservation website](#), Ministry of Agriculture, accessed 31 August 2024.

Hungary's Natura 2000 areas		
Category	Number	Hectares
Special protection areas (SPAs)	56	1,374.57
Special areas of conservation (SACs)	479	1,444.36
Overlay	10	823.95
Total	525	1,994.98

Role and rights of NPDs

In Hungary, NPDs have been traditionally responsible for nature conservation activities, such as maintaining and restoring habitats, as well as environmental education and raising public awareness. Historically, they have typically held authority over their own operational areas. However, over the past 20 years, their rights have been gradually weakened or revoked. In parallel, the rise in prominence of tourism has come to dictate parts of the funding allocations.

Conservation projects are highly effective when implemented on NPD-managed land, which spans some 290,000 hectares. Within these areas, resource absorption is exceptional at roughly 110 per cent. Projects are generally well-designed, cost-effective, and free from corruption, ensuring positive outcomes.

However, outside of these areas, conservation projects are typically either poorly implemented or fail to achieve success. Rolling out effective conservation projects in these areas requires the involvement of other sectors and stakeholders. This type of collaboration is extremely difficult due to differing priorities across sectors and the lack of an overarching cooperative framework.

Specialising in traditional conservation activities such as habitat restoration, environmental education, monitoring, and protection, NPDs have limited capacity and willingness to engage in larger-scale innovative projects, such as ecosystem-based solutions requiring multisectoral involvement. This also restricts their ability to absorb funding.

Financing nature conservation through the national budget

Nature conservation in Hungary is financed through several funding streams, with operational funding for NPDs being a key national contributor. The table below⁵ gives the amounts allocated under the 2024 budget to NPDs and the National Centre for Biodiversity and Gene Conservation.

⁵ Parliament of Hungary, Current legislation, [Act LV of 2023 on the Central Budget of Hungary for 2024](#), *Wolters Kluwer*, accessed 20 December 2024.

Category	HUF	EUR [†]
Operational costs of NPDs		
Salaries	8.3132 billion	21.2 million
Other	5.1424 billion	13.1 million
Operational income*	6.335 billion	16.1 million
Operational costs of the National Biodiversity and Gene Conservation Center		
Salaries	821.6 million	2.1 million
Other	651.5 million	1.7 million
Operational income*	185.3 million	0.5 million
Appropriation for nature conservation	1.5484 billion	3.9 million
Total (HUF and EUR)	9.9568 billion	25.4 million

[†] 2024 average conversion rate: 392.77

*NPDs are required to generate operational income through ticket sales and other activities. This income is deducted from the total figures in HUF and EUR given above.

As the table shows, nature conservation will receive a total of EUR 25.4 million from the national budget in 2024. However, this paltry sum is insufficient to meet the sector’s needs, barely covering maintenance costs for institutions and habitats, leaving no room for development. To bridge this gap, funding will have to be supplemented through agricultural activities and the EU’s Common Agricultural Policy (CAP). Restoration projects and innovative initiatives are primarily financed by the Cohesion Fund operational programmes (Environmental and Energy Efficiency Operational Programme, Competitive Central Hungary Operational Programme, Economic Development and Innovation Operational Programme), as well as the Interreg and LIFE programmes.

EU funding for nature conservation in Hungary

Since Hungary’s accession to the EU in 2004, the country has leveraged the European Regional Development Fund to initiate and implement 479 EU co-financed nature conservation projects. These efforts have contributed to the restoration of degraded habitats and the development of infrastructure for managing, promoting, preserving, and monitoring protected areas. Altogether, conservation interventions now exceed 320,000 hectares.⁶

⁶ Ministry of Agriculture, [Megvalósíthatósági Tanulmány. A hazai biológiai sokféleség állapotának korszerű módszerekkel történő nyomon követéséhez szükséges adatbázisok, módszertanok és információs rendszerek integrált fejlesztése \(KEHOP-4.3.0-VEKOP-15-2021-00003\)](#), [Termeszeterem.hu](#), Ministry of Agriculture, 2023.

According to the current Natura 2000 Prioritised Action Framework Hungary's estimated annual financial needs are approximately EUR 361.6 million. This figure equates to roughly 0.23 per cent of the country's gross domestic product and 0.52 per cent of the national budget, totalling EUR 2.5 billion for the current Multiannual Financial Framework. Of this amount, 46 per cent would be a one-time investment.⁷

This estimate reflects the cost of addressing all conservation needs under an ideal scenario, where all conservation goals are met. It does not account for any budgetary or other financial constraints. It meets the needs of the Natura 2000 network excluding species and habitats protected solely under national law.⁸

Why is there a financing gap?

The allocation of funds for different sectors and priorities is a collaborative decision-making process between the individual Member State and the European Commission. Together, the two parties decided to address only a portion of the needs identified. For the current Multiannual Financial Framework, a joint decision was made to cover only 15 per cent of these needs, amounting to EUR 112.4 million.

There is no existing mechanism to bridge the financing gap within the Prioritised Action Framework and, although this deficit has been acknowledged, no action has yet been taken. Complicating matters, the timelines for the national budget, the Multiannual Financial Framework, and the Prioritised Action Framework are not well synchronised, and their financial planning processes are different in approach.

The Recovery and Resilience Facility has provided an additional EUR 1.2 billion, which covers one nature conservation project.⁹ This sizeable allocation could play some role in reducing the financing gap when the implementation is concluded. However, several promising projects proposed by various NPDs and the Ministry of Agriculture were rejected.

Wrong timing

Negotiations for the Prioritised Action Framework began in June 2018 and concluded in April 2021. By that time, financial allocations and budgetary priorities for the Multiannual Financial Framework had already been agreed. Sectoral decisions had also been finalised when the Prioritised Action Framework planning process was still underway. As of 2018, no conclusions from the previous Prioritised Action Framework had yet been drawn.

Disintegrated planning streams

Financial allocations within the national budget follow a separate annual planning process conducted by the conservation sector. During decision-making, several sectors battle for limited resources, with the

⁷ Ministry of Agriculture of Hungary, [Natura 2000 Priorizált Intézkedési Terv Magyarország](#), Ministry of Agriculture of Hungary, 31 March 2021.

⁸ Ibid.

⁹ Fertő-Hanság National Park, [Az RRF-4.3.1-21-2022-00001 számú pályázat tájékoztató kiadványa](#), Fertő-Hanság National Park, 2022; CEE Bankwatch Network, EuroNatur, [Behind the 'green recovery': How the EU recovery fund is failing to protect nature and what can still be saved](#), CEE Bankwatch Network, 2 June 2022.

conservation sector holding minimal political power and influence. Similarly, fragmented administrations characterise the entire disbursement system both in Brussels and at the national level.

The Prioritised Action Framework operates under a different logic than that used for budget planning. Actions taken under the Prioritised Action Framework are based on habitat requirements and measured in hectares. In other words, it is a needs-based document that does not take financial limitations into account.

Limitations of mandate and lack of mainstreaming

Another major limitation in reducing financial gaps is the overly narrow mandate of the Hungarian nature conservation sector, which excludes general biodiversity conservation and green infrastructure development goals. As a result, biodiversity financing in Hungary is primarily restricted to habitat maintenance and restoration.

The nature conservation sector lacks a sufficiently broad mandate, has limited advocacy capacity, and integrates poorly with other sectors. For example, it is not meaningfully involved in the Regional and Settlement Development Operational Programme Plus, the green infrastructure and water management priority areas of the Environmental and Energy Efficiency Operational Programme Plus, in disaster management projects, or infrastructure development initiatives.

In addition, the administrative structure of the state, divided into ministries and sectors, prevents a more integrated approach. While the managing authority liaises with the Ministry of Agriculture and obtains advice on certain topics, this type of engagement lacks structure. Concerningly, during the last Multiannual Financial Framework, water management directorates often refused to cooperate with institutions specialising in nature conservation, although this stance seems to have changed recently.

In practice, the extent of the nature conservation sector's cross-sectoral involvement is mostly limited to approving projects rather than taking an active role in the joint planning of integrated projects. The current impasse is due to a combination of mutual distrust, a general lack of openness to collaborate on all sides, and an absence of incentives.

However, this problem could be resolved by either expanding its mandate or by establishing administrative bodies, such as standing committees, to systematically cover cross-sectoral and inter-sectoral topics. There is also some ambiguity concerning the exact nature of the Prioritised Action Framework: while legally defined as a 'qualifying condition', even within the EU Commission its role remains unclear. Indeed, the EU's goal of allocating an annual 10 per cent of the EU budget to biodiversity by 2026 has not been referenced or discussed during Prioritised Action Framework negotiations.

Analysis of specific EU funds and programmes

Cohesion policy funds: Environmental and Energy Efficiency Operational Programme Plus

Undoubtedly, the most important financial resource for nature conservation in Hungary is the environment and nature protection priority area in the Environmental and Energy Efficiency Operational Programme

Plus. Covering traditional nature conservation measures, this priority area sets out key targeted actions aimed at halting biodiversity loss.¹⁰

The total resources for the programme amount to EUR 4.3128 billion, including national co-financing, with HUF 1.5521 billion available for beneficiary support.¹¹ Of this, EUR 112.4 million has been allocated for nature investments, representing approximately 2.6 per cent of the overall operational programme budget. These funds are earmarked for green infrastructure-related projects outside urban areas, in addition to Natura 2000 sites and protected areas owned by the state and managed by state nature conservation authorities.

LIFE programme

The nature and biodiversity component of the LIFE programme is a crucial resource, supporting both traditional nature conservation projects and more innovative approaches to conservation. Since 1992, Hungary has implemented 85 LIFE-funded projects, 44 of which are related to biodiversity.¹²

The budget for the current Multiannual Financial Framework is EUR 5.4 billion. However, LIFE grants have become increasingly unpredictable, and Hungary's rate of success in securing projects has dropped. During the 2014–2020 financial period, only five LIFE nature and biodiversity projects coordinated by Hungary were approved, receiving a total of EUR 11.3 million in support from the programme.

On the other hand, Hungary's participation in LIFE projects coordinated by other Member States has gradually increased. In addition, Hungary is currently implementing GRASSLAND-HU, a LIFE Integrated Project running from 2019 to 2026, which aims to improve the conservation status of the country's grasslands and species. The project has a total budget of just over EUR 1.7 million, with 60 per cent in co-financing.¹³

Interreg

Interreg and cross-border cooperation initiatives in Hungary typically prioritise tourism-related developments. Nature conservation projects, when funded, tend to focus on 'soft' measures like research and monitoring as opposed to physical interventions like habitat restoration or green infrastructure development. In the previous Multiannual Financial Framework, Hungary participated in seven projects focused on biodiversity and water management, compared to only two such projects in the current financial period.¹⁴

Common Agricultural Policy

The Common Agricultural Policy has the potential to serve as a useful tool for nature conservation, but significant reforms are required to maximise its benefits. Given that NPDs manage considerable areas of

¹⁰ CEE Bankwatch Network, [Assessment of Hungary's operational programmes](#), CEE Bankwatch Network, 16, 26 May 2022.

¹¹ Ministry of Public Administration and Regional Development, [Pályázati Portál](#), Ministry of Public Administration and Regional Development, accessed 1 August 2024.

¹² European Commission, [LIFE Programme in Hungary. Facts and figures](#), CINEA, 2023.

¹³ [GRASSLAND-HU LIFE](#), [grasslandlifeip.hu](#), accessed 11 November 2024.

¹⁴ Interreg Europe, [Approved projects](#), Interreg Europe, accessed 7 November 2024.

agricultural land, the Common Agricultural Policy represents a major source of income for these organisations.

Conservation financing remains unpredictable

One major challenge in conservation financing is the unpredictability of the funding resources available to Hungary. A prime example of this occurred between 2018 and 2023 with the fluctuation in payments for NPDs under the Common Agricultural Policy.

During the 2014–2020 Multiannual Financial Framework, the administration of rural development funds under Pillar II of the Common Agricultural Policy was transferred from the Ministry of Agriculture to the Prime Minister’s Office. Under this new arrangement, a regulation was introduced barring state-owned entities from receiving support under the Common Agricultural Policy, with no public justification provided for the change. Over time, however, exceptions were made, enabling payments to state-owned entities upon request and on a case-by-case basis.

In 2023, the administration of rural development funds reverted to the Ministry of Agriculture, due to an EU-driven decision to merge the two Common Agricultural Policy pillars, which led to the funding ban on state-owned entities being lifted.

Although Common Agricultural Policy funds allocated to NPDs have contributed to conservation efforts, the same cannot be said about the funds allocated to farmers. While Pillar II payments are steadily improving and conservationists maintain a somewhat optimistic outlook, Pillar I payments continue to drive biodiversity loss and lock farmers into harmful land-use practices.

And while it is true that basic income support for sustainability (BISS) payments are tied to environmental requirements,¹⁵ some of these, such as the use of green cover, are so elementary that they should be made obligatory. Indeed, even these basic practices are threatened by the renegotiation of the conditions.

Other financing streams

While Hungary has access to additional financing streams, their scale and impact are difficult to assess and therefore fall beyond the scope of this study.

Green bonds

Hungary began issuing green bonds in 2020, with 5 per cent of the income allocated to land-use-related projects and the preservation of living natural resources and 90 per cent for improving transport systems.¹⁶ The unequal allocation of these bonds perfectly encapsulates the underlying problem with the prioritisation of biodiversity financing.

While a meagre percentage is allocated to areas crucial for halting biodiversity loss, such as natural resource preservation and land use, most of the capital is directed towards the development of transport

¹⁵ European Commission, [Common agricultural policy. The basic income support for sustainability \(BISS\)](https://agriculture.ec.europa.eu), *agriculture.ec.europa.eu*, accessed 7 November 2024.

¹⁶ Government Debt Management Agency Private Company Limited by Shares, [Green Bond](#), *Government Debt Management Agency Private Company Limited by Shares*, accessed 7 November 2024.

infrastructure, including the continuing expansion of the car manufacturing industry, which is itself a major driver of biodiversity loss. Making matters worse, the bonds also provide support for biomass burning, a practice that ultimately robs soils of essential nutrients and organic matter.

Biodiversity-associated financial risks

In 2022, the Hungarian National Bank, together with the Secretariat of the Organisation for Economic Co-operation and Development (OECD), launched a two-year research methodology project. Part of the bank's Green Programme, the aims of the project are to assess the financial risks posed by biodiversity loss and develop a financial supervisory methodology framework for addressing them.¹⁷

The results of the first phase of the project, published in August 2023, outline a range of existing biodiversity risk management tools and practices, definitions, transmission channels, contexts, and key metrics.

Building on this collaboration, in September 2023, the OECD Secretariat published a draft methodological prudential framework to help central banks identify and prioritise biodiversity-related financial risks. Support for this type of analysis is expected to assist banks in conducting the necessary assessments to understand and mitigate the broader economic consequences associated with biodiversity loss.

Priority areas and activities requiring financing

In line with the EU-level template for biodiversity conservation, the Prioritised Action Framework document identifies three main categories:¹⁸

1. Horizontal measures and administrative costs related to the Natura 2000 network

This category includes measures related to the administration of Natura 2000 sites, communication with stakeholders, tracking, and reporting.

2. Maintenance and restoration of species and habitats

(a) Natura 2000 network: Focuses on maintaining and restoring species and habitats within the network.

(b) Green infrastructure outside the Natura 2000 network: Aims to improve green infrastructure beyond the Natura 2000 network, while providing knock-on benefits for the network itself. This includes priority measures for grasslands and agroecosystems, including arable land, as well as substantial support for forests and freshwater habitats, such as rivers and lakes.

3. Other species-specific measures

This category targets specific actions for particular species and habitats considered as high priority. Altogether, 90 species and 29 habitats have been identified as requiring urgent action. In terms of activity type, site maintenance and restoration account for 90 per cent of the total allocation. These

¹⁷ Hungarian National Bank, [MNB Green Programme: results of the Biodiversity project to date have been presented](#), Hungarian National Bank, 2 August 2023.

¹⁸ Natura 2000, [Prioritized Action Framework](#), 2021-2027, Natura 2000, 24, accessed 7 November 2024.

activities are focused on preserving and restoring ecosystems such as grasslands (41.5 per cent), forests (35.5 per cent) and agroecosystems (19 per cent).

Desertification and water management

Central Hungary is prone to desertification, primarily caused by poor water management infrastructure and land-use practices, climate change, and groundwater overuse. Address these challenges requires investments in innovative localised approaches and policy improvements.

One such approach is to implement small-scale water management projects that create opportunities for sustainable small or medium-sized farms specialising in high-value agricultural products. Successful examples in Hungary include the agricultural use of flood basins for activities such as the development of orchards, fishponds, and grazing pastures.

These models sustain several ecosystem services while creating considerably more jobs than intensive farms. One way of supporting these programmes is to seamlessly incorporate water retention infrastructure into the natural environment in the form of swales and landscape-appropriate reservoirs. In tandem, irrigation practices should be prohibited on Natura 2000 sites to prevent further degradation of these areas.



Nature conservation financing in Poland

Current state of biodiversity in Poland

Poland's biodiversity is in decline and, despite some conservation efforts, numerous species and habitats are under threat. According to the European Environment Agency and national statistics, 78 per cent of the country's protected habitats are in an 'unfavourable' condition, primarily due to habitat fragmentation, pollution, and agricultural pressures.¹⁹ Forests, wetlands, and grasslands are particularly affected. Old-growth forests now cover only 3 per cent of the country's forested areas, further impacting biodiversity. Key species, including wild bees, butterflies, amphibians, and birds such as the aquatic warbler²⁰ and white stork,²¹ have experienced declines in population of between 20 and 40 per cent over the last two decades.²²

This decline aligns with broader EU trends, where biodiversity faces similar pressures. Around 75 per cent of Poland's rivers and wetlands suffer from pollution, particularly from agricultural run-off, impacting both aquatic and riparian ecosystems. The condition of only 2 per cent of Polish surface waters is considered satisfactory.²³

Forest ecosystems, grasslands, and freshwater habitats within Poland's Natura 2000 network require substantial conservation efforts due to these pressures. This network spans critical areas for biodiversity, yet funding gaps remain, notably for maintenance and restoration efforts essential to achieving favourable conservation statuses.²⁴

There are numerous problems with environmental protection in Poland, as evidenced by several infringement proceedings launched by the European Commission against the country. The most recent nature-related infringement procedure, adjudicated by the Court of Justice of the European Union in March 2023, concerned Poland's failure to safeguard woodland habitats and species. The court that Poland's

¹⁹ European Environment Agency, [Conservation Status of Habitats under the EU Habitats Directive](#), European Environment Agency, accessed 11 November 2024.

²⁰ Główny Inspektorat Ochrony Środowiska, [Wodniczka](#), Główny Inspektorat Ochrony Środowiska, accessed 11 November 2024.

²¹ Polska Agencja Prasowa, [Naukowcy potwierdzają: W południowo-zachodniej Polsce wyraźnie ubywa bocianów](#), Polska Agencja Prasowa, last modified 22 August 2023.

²² Główny Inspektorat Ochrony Środowiska, [Biuletyn Monitoringu Przyrody](#), Główny Inspektorat Ochrony Środowiska, accessed 11 November 2024.

²³ OKO.press, [Badania Wody: Wywiad](#), OKO.press, accessed 11 November 2024.

²⁴ European Environment Agency, [Natura 2000](#), European Environment Agency, accessed 11 November 2024.

policy of allowing trees to be felled during bird breeding season was illegal, violating EU nature conservation rules.

This ruling followed a series of other infringement proceedings in relation to water quality, air pollution, increased logging in Białowieża Forest, and a number of other environmental issues brought to light in recent years. The Polish government has been repeatedly urged to respect European laws and directives, including the Habitats Directive, the Birds Directive, and the Water Directive, by bringing its national protection laws into full compliance with EU rules.²⁵

Currently, Poland's forestry law does not allow concerned communities or non-governmental organisations to obtain a judicial review of forest management plans.²⁶ It also exempts forest management from complying with obligations related to the strict protection of species under EU regulations. Similarly, Poland's water law, which came into effect in 2018, prevents the country from effectively protecting its water resources in line with the Water Framework Directive's objectives. As a result, the status of Poland's water ecosystems continues to deteriorate, while public funds are not being spent efficiently.²⁷

Key drivers of biodiversity loss and the need for EU funding

The main drivers of biodiversity decline in Poland include:

Agricultural expansion and intensification: Agriculture occupies nearly 50 per cent of Poland's land area, with intensification leading to habitat fragmentation, soil degradation, and biodiversity loss.

Climate change: Poland is experiencing changes in temperature and precipitation that threaten native species, especially in sensitive ecosystems such as wetlands and mountain areas like the Carpathians. These changes put 30 per cent of Poland's species at risk of local extinction without adaptation measures in place.²⁸

Pollution: Industrial pollutants, agricultural run-off, and untreated wastewater have degraded Poland's water and soil resources. Over 70 per cent of surface water bodies are classified as 'at risk' due to high nitrogen and phosphorus levels. Agriculture is the largest source of nutrients, responsible for two-thirds of both nitrogen (67 per cent) and phosphorus (66 per cent) reaching Polish surface waters.²⁹

²⁵ CEE Bankwatch Network, EuroNatur, [Building back biodiversity: How EU Member States fail to spend the recovery fund for nature](#), CEE Bankwatch Network, 20 May 2021.

²⁶ In its March 2023 ruling, the European Court of Justice declared that Poland was in breach of EU regulations guaranteeing access to justice in environmental matters, finding that environmental groups were wrongly prevented from challenging state forest management plans in the country's local courts.

²⁷ CEE Bankwatch Network, EuroNatur, [Building back biodiversity: How EU Member States fail to spend the recovery fund for nature](#).

²⁸ A. T. Cahill, et al., [Climate-Related Local Extinctions Are Already Widespread among Plant and Animal Species](#), *PLOS Biology* 16, no. 1, January 2020.

²⁹ Foundation for the Development of Polish Agriculture, [Fertilizer management and water protection](#), *Foundation for the Development of Polish Agriculture*, 29 July 2023.

Invasive species: Invasive species such as the American mink and Japanese knotweed are increasingly problematic as they displace native species.³⁰

The European Green Deal and EU Biodiversity Strategy for 2030 require critical funding to address these issues, supporting projects focused on pollution reduction, sustainable agriculture, and biodiversity conservation and restoration. Poland's national resources alone are insufficient to meet the financial demands of these goals, making EU contributions essential.

Sources of financing

National and local government budgets

National and local government allocations for biodiversity are central to Poland's conservation efforts. The Ministry of Climate and Environment allocates approximately EUR 50 million annually to biodiversity protection programmes, including the management of protected areas, species conservation, and sustainable land-use practices. Local governments contribute an additional EUR 20 million annually, which is earmarked for projects like ecosystem restoration, community conservation initiatives, and public awareness programmes.

European Union funds

EU funding has been a significant driver of biodiversity initiatives in Poland. The following key programmes provide substantial financial resources:

LIFE programme

In the 2014–2020 funding period, the LIFE Programme supported 65 projects in Poland under the Nature and Biodiversity strand, with a total investment of EUR 163 million, of which the EU contributed EUR 91.5 million. These projects have significantly contributed to Natura 2000 network management, wetland restoration, and biodiversity protection efforts.³¹

Cohesion Fund

For the 2021–2027 period, Poland is set to receive a record €76 billion from the EU's cohesion policy funds.³² These funds are earmarked for investments in various sectors, including digital transformation, education, culture, social innovation, entrepreneurship, health protection, energy efficiency, climate, transport, and tourism. While the exact allocation for biodiversity projects within this framework isn't specified in the available sources, the European Union has committed to increasing biodiversity-related spending to 10 per cent of its budget by 2026 and 2027. Applying this target proportionally, approximately EUR 7.6 billion could be directed towards biodiversity initiatives in Poland during this period. Individual member states,

³⁰ Magdalena Piekutowska, et al., [Challenges and Problems of Nature Conservation: A Case Study from Poland](#), *Sustainability* 16, no. 13 (2024): 5572.

³¹ Wrocław University of Environmental and Life Sciences, [LIFE Programme Overview](#), *Wrocław University of Environmental and Life Sciences*, accessed 2 December 2024.

³² Government of Poland, [Poland Inaugurates European Programmes for the Years 2021-2027](#), *Government of Poland*, accessed 19 December 2024.

including Poland, are encouraged to align their national allocations and spending with EU priorities, but there is no strict requirement for each country to independently achieve the 10 per cent target.

European Regional Development Fund

Poland received EUR 150 million from 2014 to 2020, and expects to receive EUR 400 million for biodiversity projects between 2021 and 2027.

Common Agricultural Policy: Pillar I

Poland has allocated Common Agricultural Policy funding for voluntary eco-schemes that promote biodiversity-friendly practices. Examples include maintaining mid-field afforestation (EUR 560.45 per hectare), using melliferous (pollinator-attracting) plants (EUR 269.21 per hectare), and promoting agroforestry systems. These schemes incentivise farmers to adopt practices that enhance biodiversity, such as creating ecological corridors and preserving habitats.³³

Common Agricultural Policy: Pillar II

Poland has included multi-year agri-environmental commitments for actions like protecting habitats in Natura 2000 areas and conserving endangered species outside these zones. Support for these measures is critical for maintaining semi-natural habitats, traditional orchards, and landscape features like hedgerows and wetlands.³⁴

European Agricultural Fund for Rural Development

The European Agricultural Fund for Rural Development provides funding for rural development programmes aimed at enhancing biodiversity, promoting environmental conservation, and providing socio-economic support for rural communities. The European Commission's "Rural Development Programme Factsheet: Poland"³⁵ provides key details about the support and funding through EAFRD, outlining the objectives of the rural development programs, including sustainable farming and environmental conservation. Of the EUR 13.6 billion of public funding available between 2014 and 2020 (EUR 8.7 billion from the EU budget and EUR 4.9 billion from national funds). 30 per cent of the support was theoretically reserved for environmentally and climate-friendly practices.

National Fund for Environmental Protection and Water Management

The National Fund for Environmental Protection and Water Management announced allocation of EUR 350 million from European funds for the protection of Polish nature over the next few years. Main sources of this funding are European Funds for Eastern Poland 2021-2027 and the European Funds for Infrastructure,

³³ European Commission, [Poland's CAP Strategic Plan](#), *European Commission*, accessed 11 November 2024.

³⁴ Farm Europe, [Poland: CAP National Strategic Plan](#), *Farm Europe*, accessed 11 November 2024.

³⁵ European Commission, [Rural Development Programme Factsheet: Poland](#), *European Commission*, last modified November 2019.

Climate, Environment (FEnIKS) 2021-2027. Both programs are part of the broader European funding initiatives that include Cohesion Funds.³⁶

Despite the array of funding sources supporting biodiversity conservation in Poland, there are several criticisms regarding the adequacy, efficiency, and sustainability of these financial mechanisms. Challenges stem from both structural inefficiencies and limitations within funding sources, raising concerns about the effectiveness of conservation efforts. Here are the main critiques:

EU funding for nature conservation in Poland

A significant portion of Poland's biodiversity funding relies heavily on EU programmes such as the LIFE programme, the Cohesion Fund, and the European Regional Development Fund. While EU funds have been crucial in advancing conservation efforts, Poland's reliance on these external sources raises concerns about sustainability. Should EU funding priorities shift or decline, Poland might struggle to meet its biodiversity goals without sufficient domestic funding structures in place. A number of limitations also hinder the effectiveness of these funds, as outlined in greater detail below.

Difficulties with mainstreaming biodiversity in Poland

Integrating biodiversity into broader investment priorities, such as urban planning and energy projects, remains a challenge. While overarching green objectives are important, they often dilute the focus on habitat restoration or species-specific conservation. Most funds prioritise infrastructure, climate adaptation, and urban development, with biodiversity often treated as an ancillary benefit rather than a primary goal, an approach that limits dedicated ecosystem restoration efforts.³⁷ Even funds that do have a more targeted focus, such as the LIFE programme funds, often operate in isolation, and their outcomes are not always integrated into broader regional or national policies.

Indicators and monitoring systems

Monitoring systems that track the biodiversity outcomes of funded projects are not consistently applied, hindering efforts to measure the effectiveness of biodiversity investments and refine strategies accordingly.³⁸

There is also limited capacity to evaluate the long-term ecological impact of projects financed through the European Agricultural Fund for Rural Development. The absence of robust tracking mechanisms for biodiversity outcomes not only undermines the effectiveness of spending, but also limits opportunities for adaptive management and scaling up successful initiatives.

³⁶ Government of Poland, [NFOŚiGW Rozdysponuje Blisko 1,6 Mld Zł Na Ochronę Przyrody Ze Środków Europejskich](#), *Government of Poland*, accessed 19 December 2024.

³⁷ European Commission, [21-27 Cohesion Policy: Biodiversity Tracking](#), *European Commission*, accessed 11 November 2024.

³⁸ Ibid.

Short-term and project-based funding

Much of the available financing, especially from the EU, is project-based and follows a fixed-term structure. This approach often limits the potential for long-term conservation planning and continuity. For instance, many projects funded through the LIFE programme or European Regional Development Fund last only a few years, leading to scenarios where conservation efforts lose momentum once the funding period ends. The lack of sustained funding can undermine the progress of critical biodiversity projects, as long-term issues such as habitat restoration, species recovery, and ecosystem resilience require continuous support beyond the scope of short-term grants.

Additionally, complex and time-consuming application processes for EU funds often delay the implementation of urgent conservation projects, which can be detrimental to at-risk habitats and species.

Analysis of specific EU funds and programmes

Cohesion policy funds

Cohesion policy funds best highlight problems with biodiversity mainstreaming, as when programmed they include financing for a number of different sectors.

Poland's Cohesion Fund allocations under the 2021–2027 EU budget emphasise significant investments in environmental protection, infrastructure, and climate-related goals, but only a small proportion of these resources directly target biodiversity. From the EUR 24.2 billion allocated through the European Funds for Infrastructure, Climate, and Environment programme, EUR 11.2 billion comes from the Cohesion Fund, which supports activities like natural water retention, urban green spaces, and some Natura 2000-related measures. However, funding for biodiversity is typically bundled into broader environmental or adaptation projects, to the financial detriment of ecosystem restoration.³⁹ Specific amounts dedicated exclusively to biodiversity are not fully disaggregated in publicly available sources.

Administrative delays and limited interagency coordination further reduce the efficiency of fund utilisation. Additionally, local and regional authorities sometimes struggle to integrate biodiversity objectives into broader regional development plans.⁴⁰

Common Agricultural Policy

While Poland's Common Agricultural Policy plan includes many biodiversity-related initiatives, such as eco-schemes, agri-environment-climate measures, and Natura 2000 payments, certain challenges remain. Eco-schemes are a case in point. Measures like crop diversification, the protection of permanent grasslands, and the establishment of ecological focus areas under the Common Agricultural Policy have contributed to improved biodiversity outcomes. Eco-schemes represent at least 25 per cent of direct payments, targeting biodiversity, soil health, and carbon sequestration.⁴¹ However, participation in eco-schemes is voluntary,

³⁹ European Commission, [Cohesion Fund 2021-2027](#), European Commission, accessed 11 November 2024.

⁴⁰ European Commission, [Biodiversity Mainstreaming](#), European Commission, accessed 11 November 2024.

⁴¹ European Commission, [Programme Statement: Common Agricultural Policy \(CAP\) EAGF and EAFRD, 2021](#), European Commission, accessed 11 November 2024.

and uptake has been lower than expected due to limited awareness among farmers and the perceived complexity of application requirements.

A major obstacle to achieving effective and widespread biodiversity outcomes within the context of the Common Agricultural Policy and European Agricultural Fund for Rural Development spending is the continuing prioritisation of agricultural productivity at the expense of biodiversity and conservation objectives. For instance, investments in intensive farming practices can counteract gains made through conservation-focused programmes.

Additionally, the overall uptake of such measures is low, meaning many biodiversity-focused interventions are voluntary, leading to limited farmer participation. The complexity of applications and the lack of awareness about biodiversity benefits further reduce interest.

LIFE programme

The LIFE programme has been a crucial funding mechanism for biodiversity and environmental projects in Poland, contributing to several notable successes.

Projects like LIFE Green-Go! Carpathians and the INF-ARMY project have implemented habitat restoration and created management networks for Natura 2000 sites in military areas.

However, the programme presents a number of challenges, including complex application processes and administrative delays, which have hindered its full potential. Small organisations and local authorities often lack the capacity to navigate LIFE funding requirements effectively. Therefore, improvements are needed to streamline application and reporting processes and make the programme more accessible.

Recovery and Resilience Facility

Regrettably, Poland missed a significant opportunity to prioritise biodiversity spending when allocating its post-pandemic Recovery and Resilience Facility funds. As a result, biodiversity is almost entirely absent from Poland's recovery and resilience plan, a shortcoming that non-governmental organisations repeatedly raised as a major concern well before the European Commission approved the plan.⁴²

In fact, the only mention of biodiversity appears in milestone G3.1.1 in relation to renewable energy acceleration zones. This is a positive reference, as it requires authorities responsible for designating these zones to ensure that nature and biodiversity conservation are not adversely affected.⁴³ Unfortunately, this measure is classified as a proposed reform rather than an investment, meaning no direct funding has been allocated.

Insufficient national and local funding

The Polish government allocates funds for biodiversity through national and local budgets, yet critics argue that these allocations are insufficient compared to the country's conservation needs. Biodiversity-related

⁴² CEE Bankwatch Network, [Assessment of Poland's recovery and resilience plan](#), CEE Bankwatch Network, 22 April 2021.

⁴³ Government of Poland, [Załącznik Komisji Europejskiej do Krajowego Planu Odbudowy i Zwiększania Odporności](#), Government of Poland, last modified July 2021.

government spending of approximately EUR 70 million annually is considered low relative to the biodiversity challenges Poland faces, including the impacts of climate change, pollution, and urbanisation. Local governments often lack the necessary financial resources and technical expertise to manage and implement conservation projects effectively, especially in less affluent or rural regions, which may lead to uneven biodiversity protection across the country.

Inefficiencies in the National Fund for Environmental Protection and Water Management

Critics argue that the National Fund for Environmental Protection and Water Management allocation criteria sometimes favour high-profile projects over local or community-led initiatives that could have a **more direct impact on biodiversity**.

Limited effectiveness of ecological compensation and potential for misuse

In some cases, companies also struggle to fulfil their offsetting obligations due to the complexity and costs associated with implementing these measures effectively.

Underutilisation of crowdfunding and community-based financing

Crowdfunding and community-based financing are emerging as innovative sources for biodiversity funding, but they remain underutilised and relatively small-scale. Despite growing public interest, crowdfunding raises only about EUR 1 million annually, which is negligible compared to the country's overall conservation funding needs. Without broader public awareness and engagement, community-based financing initiatives face challenges in scaling up and becoming a more substantial funding source. Critics also point out that these small-scale, grassroots projects may lack the capacity to achieve meaningful conservation impacts without coordination with larger, national programmes.

Weak enforcement and limited reach of environmental taxes and levies

While environmental taxes and levies generate revenue for biodiversity projects, there are issues with enforcing these taxes and determining the proportion allocated to conservation. Funds collected from taxes on activities like carbon emissions and waste disposal are often directed toward broader environmental initiatives rather than specifically to biodiversity projects.

Priority areas and activities in need of financing

According to different sources, several priority areas require enhanced financing for biodiversity conservation in Poland:

- **Wetland and river restoration:** Poland's freshwater ecosystems need approximately millions of euros annually for restoration projects aimed at reducing pollution, improving water quality, and supporting native biodiversity.
- **Forest connectivity and restoration:** Efforts to restore degraded forests and create ecological corridors to link forested areas would reduce habitat fragmentation and aid forest-dependent species.

- **Invasive species management:** Control and management of invasive species is essential for the protection of native ecosystems.
- **Climate adaptation measures:** Sensitive ecosystems like coastal and mountainous also need millions annually for climate adaptation, which can help these ecosystems build resilience against climate change.

Investing in these areas would address key drivers of biodiversity loss while promoting sustainable resource management. For example, wetland restoration could improve water quality and biodiversity, while forest connectivity would help stabilise ecosystems. Financing these areas would align with national and EU biodiversity objectives, help to curb biodiversity loss, and build ecological resilience.

The European Commission's 2023 assessment of Poland's prioritised action framework⁴⁴ details a number of essential measures and priority actions under the Natura 2000 initiative for the 2021–2027 period. In the same assessment, Poland has identified approximately EUR 4.8 billion in biodiversity financing requirements for the 2021–2027 period. This projection reflects a 459 per cent increase over previous assessments, illustrating both an expanded understanding of needs and the escalating costs of biodiversity protection.⁴⁵ The below measures are crucial as they support not only habitat restoration but also resilience against climate impacts, aligning with Poland's commitments under the EU's Biodiversity Strategy for 2030.

Horizontal measures and administrative costs related to Natura 2000

- Site designation and management planning: EUR 3.82 million annually.
- Site administration and communication with stakeholders: EUR 1.27 million annually.
- Monitoring and reporting: EUR 4.48 million annually.
- Addressing knowledge gaps and research needs: A significant one-off cost of EUR 206.62 million.
- Natura 2000-related communication, awareness-raising, education, and visitor access: EUR 29.33 million annually.

Natura 2000 site-related maintenance and restoration measures

- The largest annual costs pertain to grasslands (EUR 287.2 million) and woodlands and forests (EUR 333.45 million), reflecting Poland's substantial coverage of ecosystems within the Natura 2000 network.
- Other habitat categories include bogs, mires, and wetlands with annual costs of EUR 33.78 million and freshwater habitats with annual costs of EUR 32.05 million.
- Specific projects with one-off costs focus on freshwater habitats (EUR 37.76 million) and smaller expenditures for rocky and sparsely vegetated lands (EUR 159 000).

⁴⁴ European Commission, [Investment needs and priorities for Natura 2000 and green infrastructure – EU-wide assessment based on Member States' prioritised action frameworks](#), *EUR-Lex*, 52, 27 April 2023.

⁴⁵ *Ibid.*, 10.

Additional green infrastructure beyond Natura 2000

- Poland's framework also identifies the need for broader green infrastructure investments outside of the Natura 2000 sites. This includes measures that enhance ecological coherence across ecosystem types like forests and grasslands, with an estimated annual cost of EUR 83.27 million, plus various one-off projects aimed at cross-border cooperation and enhancing habitat connectivity.

Additional species-specific measures not related to specific ecosystems or habitats

- Programmes for species-specific needs, especially for managing damage prevention and mitigation associated with protected species, are allocated a one-off cost of around EUR 11.68 million.

Conclusions and recommendations

Financing needs for nature conservation and restoration are increasing year by year, yet the corresponding earmarking of funds remains insufficient. When comparing the prioritised action frameworks of Member States across funding periods, cost estimates have risen substantially and are likely to further increase in the future. Even in this scenario, these projections do not account for the additional financing requirements arising from implementation of the Nature Restoration Law.

The following recommendations outline the key areas requiring significant improvements to ensure both the quality and quantity of public funding for nature conservation.

Clarify the role, scope and process of prioritised action frameworks

The function and purpose of prioritised action frameworks should be explained in greater detail. For example, they could provide greater value if leveraged to identify funding gaps and facilitate the allocation of resources across different funding streams to address these gaps. Currently, however, they are mainly employed to outline the needs of Natura 2000 funding. It is essential to distinguish between the overall costs and the actual amount of funding that is secured and guaranteed.

Strengthen cooperation across sectors

A lack of cross-sectoral cooperation is one of the key barriers to improving the provision of EU funds and hindering mainstreaming efforts. One way to address this is by expanding existing mandates or establishing administrative bodies, such as standing committees, to cover cross- and inter-sectoral topics in a more institutionalised way. Monitoring committees could serve as a useful basis for this type of joint work.

Improve connections between EU and national processes

There is a lack of awareness and integration between EU objectives and national planning processes. A more systematic integration of EU goals and strategies should be a key part of the decision-making process at the national level to ensure that spending aligns with, and supports the achievement of, these targets.

Align processes for more accurate and effective decision-making

Prioritised action frameworks and Natura 2000 funding, in particular, need to be more effectively integrated into other fund planning processes. For the current period, the prioritised action frameworks were developed in isolation from the Multiannual Financial Framework negotiations, resulting in a situation where, even though the financing needs are known, funding streams have been designed without any consideration for these requirements. Adjusting the timeline and process to establish greater coherence would enable more effective integration and alignment between funding sources and priority conservation needs.

Focus on securing long-term, sustainable funding

Nature restoration, particularly as outlined in the Nature Restoration Law, requires long-term, stable funding. Yet in many cases, funding is short-term, project-based, and highly unstable. The results of

targeted projects that have yielded strong benefits should be integrated, scaled up, and replicated where possible through larger programmes. For example, while LIFE projects are widely recognised as providing the most effective nature restoration and conservation activities, the LIFE programme itself remains a small fish in a big pond in terms of financing. For these projects to expand, larger funding programmes, such as the Common Agricultural Policy and cohesion policy, should leverage the success of these projects to finance similar projects. Establishing a dedicated fund would help facilitate this type of initiative by providing direct investments that do not compete with other sectoral interests.



Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the granting authority can be held responsible for them.