Cutting off the branch we're sitting on

Urgent course correction needed on EU biodiversity financing to secure the EU's natural resilience

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Summary

Halfway through the implementation period of the EU Biodiversity Strategy for 2030, evidence is mounting that the EU and its Member States are not on track to fulfil their commitments. This briefing examines the financing of the Strategy and provides recommendations on what needs to be done, now and in the next EU budget, to turn the situation around.

Introduction

Biodiversity is not an optional extra or a luxury. It is the basis for all life on earth. We need functioning ecosystems to ensure pollination of our crops and keep our soils fertile; to clean our water and air; to regulate the climate and mitigate disasters, pests and diseases; and to provide medicines.

But in 2019, in the first worldwide assessment since 2005, the *Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services* showed worldwide erosion of biodiversity, caused primarily by changes in how land and sea are used and direct exploitation of natural resources.[1]

Despite world-class legislation like the Habitats, Birds and Water Framework Directives, the EU was – and still is – among those failing to sufficiently protect its biodiversity.

It did not meet its Aichi targets, set under the Convention on Biological Diversity (CBD) as part of the CBD Strategic Plan for Biodiversity in 2010, until 2020.[2,3] These were integrated into the EU's 2011 to 2020 Biodiversity Strategy,[4] whose headline goal to halt and reverse biodiversity loss by 2020 was consequently also not met.[5] As the European Commission admitted in its evaluation of this Strategy, 'biodiversity, and the flow of benefits from healthy ecosystems, have continued to decline both in the EU and globally'.[6]

[1] IPBES, *Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services*, *IPBES secretariat*, 2019.

[2] Convention on Biological Diversity, National Biodiversity Strategies and Action Plans (NBSAPs), Find national targets (post COP 10), *Convention on Biological Diversity*, last updated 26 March 2025.

[3] European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The European Green Deal, *EUR-Lex*, 11 December 2019.

[4] European Commission, Communication from the Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions, Our life insurance, our natural capital: an EU biodiversity strategy to 2020, COM/2011/0244 final, *EUR-Lex*, 2011.

[5] European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The European Green Deal.

[6] European Commission, Commission Staff Working Document, Evaluation of the EU Biodiversity Strategy to 2020, SWD(2022) 285 final, *EUR-Lex*, 6 September 2022.

The Commission, in its European Green Deal, launched in December 2019, aimed to ramp up action in this field, setting 'preserving and restoring ecosystems and biodiversity' as one of the targets.[7] More details were laid out in the EU Biodiversity Strategy for 2030,[8] which was published in May 2020 and runs until the end of 2030.

Halfway through the Strategy's implementation period, there is a broad consensus that the EU is not on track to meet its objectives. This briefing examines the financing for its implementation and provides recommendations on what needs to be done in the next EU budget to turn the situation around.

It first provides an overview of the Strategy's main commitments, then summarises several reports that have already examined implementation so far. It then looks in more detail at progress on the Strategy's commitments regarding financing and the prospects for the next few years. Annexes with case studies on Estonia, Hungary and Latvia illustrate how implementation and financing is playing out on the ground.

The briefing concludes that in a context of already insufficient investment in biodiversity, the Commission's proposal for the new multiannual financial framework (MFF) for 2028 to 2034 is a major threat to the EU's prosperity and wellbeing, and underlines the importance of including dedicated, earmarked biodiversity funding in the next EU budget.

It also emphasises the importance of phasing out environmentally harmful subsidies and enforcing EU law as key elements of a rational approach to nature protection and restoration, keeping funding needs to a minimum by preventing as much harm as possible in the first place.

About the Biodiversity Strategy for 2030

The Strategy's key commitments are shown in the box below.

Key commitments from the EU Biodiversity Strategy for 2030[9]

- Legally protect a minimum of 30 per cent of the EU's land area and 30 per cent of the EU's sea area and integrate ecological corridors as part of a true Trans-European Nature Network.
- Strictly protect at least one-third of the EU's protected areas, including all remaining primary and old-growth forests.

[7] European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The European Green Deal.

[8] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 - Bringing nature back into our lives, COM/2020/380 final, *EUR-Lex*, 20 May 2020.

[9] Ibid.

- Effectively manage all protected areas, defining clear conservation objectives and measures, and monitoring them appropriately.
- Proposal of legally binding EU nature restoration targets in 2021, subject to an impact assessment.
- By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30 per cent reach favourable conservation status or at least show a positive trend.
- The decline in pollinators is reversed.
- The risk and use of chemical pesticides is reduced by 50 per cent and the use of more hazardous pesticides is reduced by 50 per cent.
- At least 10 per cent of agricultural area is under high-diversity landscape features.
- At least 25 per cent of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.
- Three billion new trees are planted in the EU, in full respect of ecological principles.
- Significant progress has been made in the remediation of contaminated soil sites.
- At least 25,000 kilometres of free-flowing rivers are restored.
- There is a 50 per cent reduction in the number of Red List species threatened by invasive alien species.
- The losses of nutrients from fertilisers are reduced by 50 per cent, resulting in the reduction of the use of fertilisers by at least 20 per cent.
- Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.
- No chemical pesticides are used in sensitive areas such as EU urban green areas.
- The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.
- The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.

The EU's 8th Environmental Action Programme,[10] approved in 2022, also furthered the goals of the Biodiversity Strategy by including as one of its 2030 objectives *'protecting, preserving and restoring marine and terrestrial biodiversity and the biodiversity of inland waters inside and outside protected areas ...'*

In addition to its list of key commitments, the Strategy includes several other actions in the text which are crucial for its success. Among these are several pledges on financing, which are quite light on detail.

The main finance-related provisions in the Biodiversity Strategy for 2030[11]

- Strengthening of the biodiversity proofing framework to ensure that EU funding supports biodiversity-friendly investments.
- Unlocking at least EUR 20 billion per year in public and private funding at national and EU level for spending on nature. A 'significant proportion' of the 25 per cent of the EU budget dedicated to climate action will be invested in biodiversity. In order to update the EUR 20 billion estimate, the Commission will create an EU-level Prioritised Action Framework (PAF) based on those submitted by Member States.
- Under Invest EU, establishing a dedicated natural-capital and circular-economy initiative to mobilise at least EUR 10 billion during the Strategy period, based on public/private blended finance.
- Adoption of a delegated act under the Taxonomy Regulation to establish criteria on economic activities that substantially contribute to protecting and restoring biodiversity.
- Revision of the Sustainable Finance Strategy.
- Promotion of tax systems and pricing that reflect environmental costs, including biodiversity loss, by the Commission. This should encourage changes in national fiscal systems to shift the tax burden from labour to environmental externalities.
- Integration of criteria to boost nature-based solutions when the Commission proposes further legislation and guidance on green public procurement.

[10] European Parliament, Decision (EU) 2022/591 of the European Parliament and of the Council of 6 April 2022 on a General Union Environment Action Programme to 2030, *OJ L 114*, *EUR-Lex*, 22–36, 12 April 2022.

[11] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 - Bringing nature back into our lives.

The interinstitutional agreement on the 2021 to 2027 EU budget provides more concrete goals on financing – 7.5 per cent in 2024, and 10 per cent in 2026 and 2027, of annual spending from the EU budget should be dedicated to biodiversity objectives.[12]

The Biodiversity Strategy delayed decision-making on how to ensure that its governance would be fit for purpose, but pledged that:

> *The new governance framework will ensure co-responsibility and co-ownership by all relevant actors in meeting the EU's biodiversity commitments. It will support administrative capacity building, transparency, stakeholder dialogue, and participatory governance at different levels.*
>
> *The Commission will assess the progress and suitability of this approach in 2023, and consider whether a legally binding approach to governance is needed.*[13]

Off track

But halfway through the Biodiversity Strategy's implementation period, there is no doubt that the EU and its Member States are off track for fulfilling their 2030 commitments.

The European Environment Agency's first monitoring report on the 8th Environmental Action Programme, published in December 2023, already showed that across four biodiversity indicators also relevant for the Biodiversity Strategy,[14] the EU was unlikely to achieve them.[15] By February 2025 when the next edition was published,[16] little had changed. The EU was still deemed to be 'likely off track' for all four indicators. More recent data on the European Commission's EU Biodiversity Strategy Dashboard confirms that there has been no progress on protection of land and sea areas since 2021, with 26.1 per cent of land and 12.3 per cent of sea protected.[17] The population of common birds continues to fall, while forest connectivity has remained steady.[18]

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[12] European Parliament, Council of the European Union, European Commission, Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on budgetary discipline, on cooperation in budgetary matters and on sound financial management, as well as on new own resources, including a roadmap towards the introduction of new own resources, *OJ L 433I*, *EUR-Lex*, 28–46, 22 December 2020.

[13] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 - Bringing nature back into our lives.

[14] Legally protect at least 30 per cent of the EU's land area by 2030; Legally protect at least 30 per cent of the EU's sea area by 2030; Reverse the decline in populations of common birds; Increase the degree of connectivity in forest ecosystems with a view to creating and integrating ecological corridors and increase climate change resilience.

[15] European Environment Agency, Monitoring report on progress towards the 8th EAP objectives 2023 edition, EEA Report 11/2023, *European Environment Agency*, December 2023.

[16] European Environment Agency, Monitoring report on progress towards the 8th EAP objectives 2024 edition, EEA Report 01/2025, *European Environment Agency*, February 2025.

[17] European Commission, EU Biodiversity Strategy Dashboard, indicators updated 18 August 2025.

[18] European Commission, EU Biodiversity Strategy Dashboard, indicators updated in January and June 2025 respectively.

A 2024 report by BirdLife Europe examined a wider set of commitments under the Biodiversity Strategy for 2030 and concluded that most were off track:

> *This delay stems largely from issues that plagued previous strategies: lack of political coherence, insufficient national responsibility, and reluctance to challenge the status quo. The reliance on non-binding targets has once again proven ineffective in ensuring adequate implementation by Member States. Furthermore, most policies relevant to the achievement of the biodiversity targets have either been delayed or significantly watered down, mainly due to pressure from powerful lobbying groups.*[19]

Most recently, the European Environment Agency's *Europe's environment 2025* report, published in September, found that more than 80 per cent of protected habitats are still in a poor or bad state, with 60 to 70 per cent of soils degraded. Persistent pressures driven by unsustainable production and consumption patterns, most notably the food system, include changes in land and sea use, the over-exploitation of natural resources, pollution and invasive alien species, as well as the increasingly severe impacts of climate change. The report also found that Europe's water resources are under severe pressure; water stress currently affects 30 per cent of Europe's territory and 34 per cent of the population.[20]

Given the time lag between policies and legislation being adopted and change becoming visible in statistics, this largely reflects the flaws of the previous biodiversity strategy, the impact of environmentally harmful subsidies and inadequate enforcement of environmental law. But the lack of new protected areas since 2021, lack of progress in phasing out environmentally harmful subsidies, and outstanding breaches of nature protection legislation suggest that the situation will not improve without a significant increase in political will.

Despite the Commission pledging to '*consider whether a legally binding approach to governance is needed*' in 2023, we have not found any clear answer to this question in any of the sources providing updates on the Strategy's implementation.

Financing for the Biodiversity Strategy for 2030 in practice

As explained above, in the Biodiversity Strategy the Commission committed to implementing seven main actions on biodiversity financing. This section looks at the progress so far.

Strengthening the biodiversity proofing framework to ensure that EU funding supports biodiversity-friendly investments.

[19] BirdLife International Europe and Central Asia, *Time to restore – Progress and pitfalls in implementing the EU Biodiversity Strategy*, *BirdLife International Europe and Central Asia*, September 2024.

[20] European Environment Agency (EEA), *Europe's environment and climate: knowledge for resilience, prosperity and sustainability*, EEA report 11/2025, *European Environment Agency*, September 2025.

This refers to operationalisation of the 'do no significant harm' principle, which until now has been patchily implemented across EU funds.[21] For example, while the Commission developed 'do no significant harm' guidance for the Recovery and Resilience Facility, cohesion funds and Social Climate Fund, it has not done so for the Reform and Growth Facility for the Western Balkans or the Modernisation Fund. In its Biodiversity Strategy Actions Tracker,[22] the Commission admits that this item is not yet completed, but work is ongoing.

One of the positive features of the Commission's proposal for the next multiannual financial framework (2028–2034) is that a unified framework for 'do no significant harm' assessment is expected to be applied across the EU budget.[23] If this is sufficiently environmentally robust and includes a list of sectors excluded for financing from EU funds due to their harmful impacts on nature protection and other environmental objectives, it could represent a significant step forward in ensuring that EU funds support only benign investments.

EU funds are certainly not the only source of environmentally harmful subsidies, but a 2024 report commissioned by WWF revealed that Member States are channeling between EUR 34 billion and EUR 48 billion of European funds annually into activities that harm nature. This includes up to 60 per cent of the EU's common agricultural policy (CAP) funding, totalling EUR 32.1 billion annually; transport infrastructure funding between EUR 1.7 billion and 14.1 billion; fisheries subsidies of between EUR 59 and EUR 138 million, and water infrastructure funding between EUR 1.3 billion and EUR 2 billion.[24]

The Commission's Actions Tracker[25] mentions its work on environmentally harmful subsidies under the 8th Environmental Action Programme as contributing to biodiversity-proofing. In 2024, the Commission produced a Guidance document for reporting of non-energy Environmentally Harmful Subsidies (EHS), which it shared with Member States for their reporting in March 2025.[26] However, as the European Environment Agency's latest monitoring report was published in February 2025,[27] it is not yet known what this reporting will show.

Halfway through the implementation of the Biodiversity Strategy, there are still no official figures showing the scale of environmentally harmful subsidies.

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[21] Daniel Thomson, Christophe Jost, *From theory to practice - A case-based analysis of the EU's 'do no significant harm' principle*, *CEE Bankwatch Network*, July 2024.

[22] European Commission, EU Biodiversity Strategy Actions Tracker, action progress updated November 2024.

[23] European Commission, Proposal for a Regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities, *EUR-Lex*, 16 July 2025.

[24] Trinomics, *Can your money do better?*, *WWF European Policy Office*, May 2024.

[25] European Commission, EU Biodiversity Strategy Actions Tracker, 4.

[26] European Commission, Guidance document for reporting of non-energy Environmentally Harmful Subsidies (EHS), *European Commission,* 2024.

[27] European Environment Agency, Monitoring report on progress towards the 8th EAP objectives 2024 edition, EEA Report 01/2025, *European Environment Agency*, February 2025.

Spending at least EUR 20 billion per year in public and private funding at national and EU levels on nature, creating an EU-level Prioritised Action Framework to update cost estimates, and investing a 'significant proportion'[28] of the 25 per cent of the EU budget dedicated to climate action in biodiversity.

The Biodiversity Strategy derived the EUR 20 billion per year cost estimate from the 2018 Impact Assessment of the LIFE Regulation, a Study on the costs of implementing the Target 2 of the EU Biodiversity Strategy to 2020, and data submitted by 16 Member States under Article 8(1) of the Habitats Directive.[29] The Commission committed to update the estimate based on Member States' Prioritised Action Frameworks under the Habitats Directive, which it did in 2023.[30] It estimated that EUR 10.2 billion is needed annually to complete the Natura 2000 network and for green infrastructure:

- EUR 4.8 billion to maintain and restore the Natura 2000 network;
- EUR 2.5 billion for additional green infrastructure measures beyond Natura 2000;
- EUR 2.1 billion for horizontal and administrative measures; and
- EUR 0.8 billion for species-specific measures.[31]

However, in 2022 IEEP and Trinomics carried out a more comprehensive assessment of the costs of implementing the Biodiversity Strategy – not only Natura 2000 and green infrastructure – and came up with significantly higher figures. They estimated total financing needs at EUR 481.48 billion between 2021 and 2030, including baseline biodiversity expenditure estimated at EUR 26.36 billion per year, translating broadly to an annual financing need of EUR 48.15 billion.[32]

They predicted an average of EUR 29.46 billion in spending annually from 2021 to 2030, including EUR 15.22 billion annually from the EU budget, and an estimated average of EUR 13.87 billion of Member State expenditure. Considering that the EU and Member States' combined estimated annual expenditure for the period from 2014 to 2020 averaged at around EUR 24 billion, this would represent an estimated EUR 5 billion annual increase in biodiversity expenditure. However, it would leave an estimated financing gap of around EUR 186.89 billion, or EUR 18.69 billion per year, from 2021 to 2030.[33]

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[28] As explained above, the interinstitutional agreement on the current EU budget set the figures at 7.5 per cent in 2024, and 10 per cent in 2026 and in 2027 of annual spending for biodiversity objectives.

[29] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 - Bringing nature back into our lives.

[30] European Commission, Commission Staff Working Document - Investment needs and priorities for Natura 2000 and green infrastructure – EU-wide assessment based on Member States' prioritised action frameworks, SWD(2023) 99 final, *European Commission*, 13 April 2023.

[31] Ibid.

[32] Martin Nesbit et al., *Biodiversity Financing and Tracking – Final Report*, *Institute for European Environmental Policy and Trinomics*, 2022.

[33] Ibid.

The fact that the annual need of EUR 48.15 billion is almost five times as high as the Commission's 2023 estimate partly reflects the fact that the IEEP and Trinomics study is much wider than the Commission's assessment. They expected the financing needs related to the expansion and connectivity of protected areas to cost roughly EUR 5 billion per year, and restoration about EUR 7.9 billion, totalling EUR 12.9 billion – considerably more than the EUR 10.2 billion estimated by the Commission, but the main difference lies in other items. These include EUR 3.8 billion per year to tackle Invasive Alien Species, EUR 2.1 billion for urban greening, EUR 1.3 billion for anti-deforestation measures, and EUR 1.2 billion for the Strategy's agriculture-related objectives.[34]

More recently, the Commission has also come up with a new estimate on the funds needed to implement the EU Nature Restoration Regulation, totalling between EUR 11.8 and EUR 13.1 billion per year until 2030 – however, this is only for restoration, not for other protection activities. Reportedly, many Member States consider this estimate conservative as it covers only active restoration and does not account for additional related costs. Current funding for restoration from the existing EU budget and Member States' budgets amounts to approximately EUR 9.4 billion per year, resulting in an annual gap of EUR 2.4 to 3.7 billion until 2027 and more after that.[35]

Despite the IEEP and Trinomics study finding that EUR 48 billion per year is needed until 2030 to implement the Biodiversity Strategy, the EUR 20 billion per year figure has to a large extent stuck as the yardstick by which spending is measured. The first calculation against this indicator was carried out earlier this year and suggests that the EUR 20 billion per year target was met in 2023 largely due to the Recovery and Resilience Facility, but that in the following years, major financing gaps of more than EUR 4 billion per year could be expected.[36]

The European Commission's 2025 Environmental Implementation Review takes a different approach, however, and puts average annual biodiversity and ecosystems spending for 2021 to 2027 at EUR 28 billion, with a financing gap of EUR 37 to 38.6 billion per year.[37] The review does not cite the total figure which this gap is being assessed against, but an accompanying infographic shows a total need of EUR 66.75 billion annually.[38] It is not completely clear where these figures come from, but it seems likely that they arise from

[34] Ibid.

[35] Council of the European Union, General Secretariat of the Council, AOB for the meeting of the Council (Environment) on 21 October 2025 Reflecting the environmental agenda in the Multiannual Financial Framework 2028-2034 - Information from Czechia, *Council of the European Union*, 10 October 2025.

[36] Marine Robuchon et al., *Assessing progress in monitoring and implementing the EU Biodiversity Strategy for 2030*, *Publications Office of the European Union*, 2025.

[37] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 2025 Environmental Implementation Review Environmental implementation for prosperity and security, *European Commission*, 39, 7 July 2025; European Commission, Environmental investment needs and gaps, *European Commission*, accessed 15 October 2025.

[38] European Commission, Environmental investment needs and gaps.

the IEEP/Trinomics study, plus the additional costs of sustainable soil management arising from the Soil Monitoring Law initiative, beyond what is already included in the Biodiversity Strategy for 2030.[39]

In terms of percentages of EU funds, final figures for 2024 are not available yet, but estimates of financing for biodiversity programmed by Member States under EU funding instruments indicate that the target of 7.5 per cent of EU funds for 2024 may have been reached or nearly reached. However, there are significant variations in the uptake of biodiversity financing across EU countries and funding instruments. And it is estimated that the EU will fall significantly below the 10 per cent biodiversity financing target for 2026 and 2027.[40]

In addition, all the above figures assume that biodiversity spending is appropriately measured and categorised. However, this is not always the case. The Commission tracks biodiversity expenditures through EU coefficients inspired by the OECD Rio markers. Coefficients are assigned to the various activities, which reflect their expected contribution to biodiversity objectives: significant (100 per cent), moderate (40 per cent), or not relevant (0 per cent).

This system has been criticised by civil society organisations[41] and the European Court of Auditors,[42] among others, since it is not applied uniformly across funds, and oversimplifies and overestimates expenditure and its positive impact. Also, being estimated *ex ante*, it does not take account of the results actually achieved. In 2023, the Commission made some minor updates to the methodology, but it remains essentially the same.[43] All this means that the biodiversity financing gap may be even larger than presented, since some of the funds counted towards these objectives are not specifically targeted at nature protection and restoration.

Establish a dedicated natural-capital and circular-economy initiative under Invest EU to mobilise at least EUR 10 billion over the next 10 years, based on public/private blended finance.

Although the Commission is clearly making efforts to increase the number of bankable biodiversity projects, so far the financing from InvestEU for this has fallen far short of EUR 10 billion. In its activity tracker, the most specific achievement so far is the setting up of the Green Advisory Service for Sustainable Investments Support (Green Assist), an advisory initiative under InvestEU funded by the LIFE Programme which aims to build a pipeline for green investment projects. Out of EUR 50 million available from LIFE, up to EUR 30

[39] Ibid., 39.

[40] Ibid., 30.

[41] Daniel Thomson, *How to determine the contribution of EU funds for biodiversity*, *CEE Bankwatch Network*, January 2024.

[42] European Court of Auditors, *Tracking climate spending in the EU budget, Review No. 01*, *European Court of Auditors*, 2020.

[43] European Commission, Biodiversity tracking methodology for each programme 2021-2027, *European Commission*, June 2023.

million is earmarked for Green Assist, whilst up to EUR 20 million is financing the European Investment Bank's (EIB) Sustainable Infrastructure Advisory facility.[44]

Looking at InvestEU's operations list so far,[45] it seems unlikely that it will mobilise EUR 10 billion in biodiversity investments in 10 years. The Commission seems to allude to this in its comment that its work on this commitment is 'building upon the lessons learned from the EU Natural Capital Financing Facility'.[46] The EU Natural Capital Facility was a pilot programme run by the EIB from 2015 to 2022, which although financing some interesting projects, struggled to find enough that were suitable to finance.[47] This reflects the fact that although biodiversity investments have very strong socio-economic benefits (see below on the costs of non-implementation), they are rarely so immediately income-generating as to be able to pay off bank loans – even if they are backed by guarantee facilities like InvestEU. With a few exceptions, grant funding – which can be funded by taxes or user/visitor fees – is much more suitable for biodiversity financing.

In 2021, adopt a delegated act under the Taxonomy Regulation to establish criteria on economic activities that substantially contribute to protecting and restoring biodiversity.

This has been done, albeit with a delay. In June 2023, the Commission adopted a Delegated Act setting out the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to four environmental objectives under the Taxonomy Regulation, including the protection and restoration of biodiversity and ecosystems.[48] The biodiversity criteria are science-based and reasonable, and could be used to improve the current tracking methodology for EU spending on biodiversity.

Revise the EU Sustainable Finance Strategy.

This has been done: the Commission published its Strategy for financing the transition to a sustainable economy in 2021.[49] It will likely require an update before the end of the Biodiversity Strategy period, but it is not clear whether any plans exist for this.

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[44] European Commission, EU Biodiversity Strategy Actions Tracker, action progress updated April 2023.

[45] Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, InvestEU operations - list, *Investeu*, accessed 14 October 2025.

[46] European Commission, EU Biodiversity Strategy Actions Tracker, action progress updated April 2023.

[47] Guy Hudson, Stephen Hart, Arnold Verbeek, *Investing in nature-based solutions State-of-play and way forward for public and private financial measures in Europe*, *European Investment Bank and the European Commission*, 2023.

[48] European Commission, Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities, C/2023/3851, *OJ L, 2023/2486*, *EUR-Lex*, 21 November 2023.

[49] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Strategy for Financing the Transition to a Sustainable Economy COM/2021/390 final, *European Commission*, 6 July 2021.

Further promote tax systems and pricing that reflect environmental costs, including biodiversity loss. This should encourage changes in national fiscal systems to shift the tax burden from labour to environmental externalities.

This action is hard to measure but aims to ensure the full implementation of the 'polluter pays principle' to disincentivise biodiversity damage. Studies on this topic have been produced and a European-Commission-led fitness check on the polluter pays principle is ongoing, the results of which will reportedly be published in 2025.[50,51]

In reality, the Commission's 2025 Environmental Implementation Review finds that Member States are not relying much on environmental taxation, but the latest figures seem to be from 2022. In that year, the environmental tax revenue-to-GDP ratios ranged from 0.9 per cent in Ireland to 5.6 per cent in Greece.[52] Subsequently, the Commission recommends all Member States to use more national funding – e.g. by increasing taxes in favour of the environment and reducing environmentally harmful subsidies – as well as EU funding and private funding to help close the investment gap.[53]

When proposing further legislation and guidance on green public procurement, integrate criteria to boost nature-based solutions.

This action is quite vague, but according to the Commission's Biodiversity actions tracker, this action includes the revision of the current EU green public procurement criteria for office buildings, which was expected to have been finalised by 2023.[54] But as of mid-October 2025, the Commission website on Green Public Procurement states that the relevant criteria are still under revision.[55] In any case the criteria are only voluntary and thus cannot be expected to be implemented across the board.

[50] European Commission, Ensuring that polluters pay - toolkit, *European Commission*, accessed 15 October 2025.

[51] The fitness check is late as the results were due to be published in 2024. European Commission, Polluter Pays Principle – fitness check of its application to the environment, *European Commission*, accessed 15 October 2025.

[52] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 2025 Environmental Implementation Review Environmental implementation for prosperity and security, *European Commission*, 7 July 2025.

[53] European Commission, Annex to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 2025 Environmental Implementation Review Environmental implementation for prosperity and security.

[54] European Commission, EU Biodiversity Strategy Actions Tracker.

[55] European Commission, Green Public Procurement Criteria and Requirements, *Green Forum*, accessed 15 October 2025.

Summary of progress so far on the financing actions and outlook for the future

Of the seven main financing actions, only two have been fully completed. Some were formulated too generally in the first place, and the planned InvestEU natural capital and circular economy initiative seems unlikely to mobilise EUR 10 billion for biodiversity alone.

But most worryingly, a financing gap remains, even compared to the Biodiversity Strategy's low estimate of EUR 20 billion per year figure, let alone IEEP/Trinomics' estimate of EUR 48 billion per year or EUR 66.75 billion per year cited by the Commission in the infographic accompanying the 2025 Environmental Implementation Review.[56]

Against this background, it is particularly worrying that the Commission's and Member States' work on phasing out environmentally harmful subsidies (described above) and enforcement of EU environmental law is going so slowly.

A 2024 report by the European Court of Auditors found that the Commission has improved its management to detect and correct infringements of EU law, but it still takes too long to close infringement cases.[57] As of 2 April 2025, there were 309 ongoing infringement cases concerning EU environmental law, excluding climate law, amounting to around 19 per cent of all infringement cases. Of these 309, around a quarter were related to biodiversity.[58]

In the various reports documenting progress on the Biodiversity Strategy, we have not been able to find any clear answer to the question of whether a legally binding approach to governance is needed, despite the Strategy's pledge that the Commission would examine this in 2023.[59]

It is also worrying that the Commission is devoting its limited resources to developing nature credits, an over-complicated approach that looks highly unlikely to deliver substantial funds or nature protection.[60]

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[56] European Commission, Environmental investment needs and gaps.

[57] European Court of Auditors, Enforcing EU law - The Commission has improved its management of infringement cases, but closing them still takes too long, *European Court of Auditors*, 2024.

[58] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 2025 Environmental Implementation Review Environmental implementation for prosperity and security.

[59] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 - Bringing nature back into our lives.

[60] Pippa Gallop, *EU biodiversity credits – barking up the wrong tree*, *CEE Bankwatch Network*, July 2025.

Moreover, the outlook for closing the nature spending gap in the next EU multiannual financial framework is currently grim, as the Commission's proposal[61] foresees no earmarked financing for biodiversity at all, and no separate spending targets for biodiversity – only environmental objectives as a whole.[62]

The experience with existing EU funding instruments shows that when biodiversity is mixed together with other objectives in public funds, it always loses out to sectors which are more industry-friendly and easier to invest in, such as climate mitigation or circular economy. For example, according to the Commission, only two per cent of the funds from the Recovery and Resilience Facility have been allocated to biodiversity[63] – even taking into account the tendency described above to overestimate contributions to this objective, due to the use of the Rio markers methodology.

The Commission also highlighted under-use of available funds for biodiversity in its evaluation of the previous EU Biodiversity Strategy, in a description which remains true today:

> *Funding opportunities have increased in response to the biodiversity targets, but this increase has not reached the level needed to meet the financing needs and reverse biodiversity decline, and opportunities provided by EU instruments have not been taken up fully in EU countries.*
>
> *In the context of limited budgets and competing demands, biodiversity targets and support measures – especially those of a voluntary nature – have been insufficiently prioritised and integrated into policy and investment decisions ...*[64]

It is crucially important to learn these lessons about biodiversity financing. Expecting nature to compete with other sectors in the same funds does not work: dedicated funding and clear, binding targets are needed in the next MFF.

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[61] European Commission, Proposal for a Council Regulation laying down the multiannual financial framework for the years 2028 to 2034, *EUR-Lex*, 16 July 2025; European Commission, Proposal for a Regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities.

[62] Daniel Thomson, *The future of biodiversity financing: Where does it stand in the next EU budget?*, *CEE Bankwatch Network*, 14 October 2025.

[63] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 2025 Environmental Implementation Review Environmental implementation for prosperity and security.

[64] European Commission, Commission Staff Working Document, Evaluation of the EU Biodiversity Strategy to 2020, SWD(2022) 285 final.

The cost of not implementing EU environmental law

Just as it is crucial to ensure sufficient funding for nature protection and restoration, this cannot have an adequate impact if the EU institutions and Member States fail to stop environmentally harmful subsidies and the destruction of biodiversity due to infringements of EU law.

The Biodiversity Strategy states that the full implementation and enforcement of EU environmental legislation is at its heart, and that political support and financial and human resources will need to be prioritised in order to focus on completing the Natura 2000 network, ensuring the effective management of all sites, implementation of species-protection provisions, and measures for species and habitats that show declining trends. It also commits the Commission to ensure that environment-related legislation with an impact on biodiversity is better implemented, enforced and – where necessary – reviewed and revised, and to support civil society's role as a compliance watchdog.

While nature protection is often considered costly, it is much cheaper than the costs of failing to do so. An April 2025 study found that the cost of not fully implementing EU environmental law and policy – covering eight policy areas, not only nature – already amounts to at least EUR 180 billion a year, rising to EUR 325 billion per year when considering targets that will apply in the near future.[65] Yet implementation would take EUR 122 billion per year, so dealing with the consequences of environmental degradation is far more costly than ensuring implementation.[66]

For biodiversity, the implementation gap costs between EUR 62 billion and 81 billion per year for the three quantified Biodiversity Strategy targets assessed. Of this, delays in protecting land costs amount to EUR 11 billion to 30 billion per year; the decline in bird numbers carries a cost of EUR 5 billion per year; and economic losses associated with invasive alien species could be around EUR 46 billion per year.[67]

The study does not quantify the costs of implementation, only the costs of the remaining gaps to achieving the EU's targets. But the European Commission puts the financing needs of the Natura 2000 network at EUR 10.2 billion per year,[68] so less – and potentially much less – than the cost of failing to protect it.

[65] European Commission Directorate-General for Environment, Logika Group, RPA Europe, EMRC, *Update of the costs of not implementing EU environmental law*, *Publications Office of the European Union*, 2025.

[66] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 2025 Environmental Implementation Review Environmental implementation for prosperity and security.

[67] European Commission Directorate-General for Environment, Logika Group, RPA Europe, and EMRC, *Update of the costs of not implementing EU environmental law*.

[68] European Commission, Financing Natura 2000, *European Commission*, accessed 15 October 2025.

Moreover, older assessments have estimated the ecosystem services provided by Natura 2000 at between EUR 200 billion and 300 billion per year, far exceeding the network's costs.[69]

For marine areas, estimates suggest that the benefits of expanding protection exceed the costs by a factor 1.4 to 2.7, depending on the location and extent of expansion.[70] This is to be expected, among others due to the direct impact on the availability of seafood.

Properly applying EU law to protect and restore nature is crucial for our food, water, air, climate, medicines and mental health, as well as being legally binding and a moral imperative. But it also makes abundant economic sense, reducing the need for later additional funding to undo the damage of non-implementation. The EU's next budget underestimates this need to the peril of us all, our wellbeing and prosperity.

Conclusions and recommendations

Despite nature forming the basis for all life on earth, the EU is still failing to sufficiently protect its biodiversity. In 2019, the European Green Deal aimed to ramp up action in this field[71] and was followed in 2020 by the EU Biodiversity Strategy for 2030.[72] But half way through the Strategy's implementation period, there is a broad consensus that the EU is not on track.

Of seven main financing actions, only two have been fully completed. Most worryingly, a financing gap remains, even compared to the Strategy's low estimate of EUR 20 billion per year figure, let alone an estimate by the IEEP and Trinomics of EUR 48 billion per year, or EUR 66.75 billion per year cited by the Commission in the infographic accompanying the 2025 Environmental Implementation Review.[73]

Despite a commitment to examine the issue in 2023, we have not been able to find any analysis by the Commission on whether a legally binding approach to nature governance is needed.[74]

Against this background, it is particularly worrying that the Commission's and Member States' work on phasing out environmentally harmful subsidies under the 8th Environmental Action Programme and

[69] P. ten Brink et al., *Estimating the overall economic value of the benefits provided by the Natura 2000 network*, *Institute for European Environmental Policy*, Brussels, 2011.

[70] Luke M. Brander et al., The global costs and benefits of expanding Marine Protected Areas, *Marine Policy, 116*, 103953, June 2020.

[71] European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, The European Green Deal.

[72] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 - Bringing nature back into our lives.

[73] European Commission, Environmental investment needs and gaps.

[74] European Commission, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 - Bringing nature back into our lives.

enforcement of EU environmental law is going so slowly, as this will only increase the need for funding to mitigate the consequences later.

The biodiversity implementation gap already costs between EUR 62 billion and 81 billion per year for just three targets from the Biodiversity Strategy, of which between EUR 11 billion and 30 billion relate to the protection of land areas.[75] But the Commission puts the financing needs of the Natura 2000 network at EUR 10.2 billion per year,[76] so less – and potentially much less – than the cost of failing to protect it. Applying EU law to protect and restore nature is crucial for life on earth, but it also makes abundant economic sense.

Unfortunately, the outlook for closing the nature spending gap and ensuring the proper implementation of EU law in the next EU multiannual financial framework is currently grim, as the Commission's proposal[77] foresees no earmarked financing for biodiversity at all, and no separate spending targets for biodiversity – only environmental objectives as a whole.[78] The EU budget underestimates the need for earmarked biodiversity funding to the peril of us all, our wellbeing and prosperity. We all depend on nature to live, and the EU's nature is in a perilous state. We need to step up conservation and restoration efforts, not weaken them.

Recommendations to the European Commission

- Avoid further delays to or backtracking on European Green Deal commitments and put an immediate end to weakening EU environmental safeguards.
- If not done already, conclude whether a legislative approach is needed to biodiversity governance.
- Ensure that the Directorate-General for Environment (DG ENV) is properly staffed to step up on environmental enforcement, in order to save money and get better results.
- Speed up reporting on non-energy environmentally harmful subsidies and step up measures to phase out all harmful subsidies, including binding ones where needed.
- Better track biodiversity funds, not relying on the Rio markers methodology. Only investments which fulfil the following conditions should be counted as nature projects:
    - They directly contribute to the protection and/or restoration of biodiversity;

[75] European Commission Directorate-General for Environment, Logika Group, RPA Europe, and EMRC, *Update of the costs of not implementing EU environmental law*.

[76] European Commission, Financing Natura 2000.

[77] European Commission, Proposal for a Council Regulation laying down the multiannual financial framework for the years 2028 to 2034; European Commission, Proposal for a Regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities.

[78] Daniel Thomson, *The future of biodiversity financing: Where does it stand in the next EU budget?*.

  - They comply with the significant contribution and 'do no significant harm' criteria under the relevant taxonomy Delegated Act;
  - They contribute to achieving the objectives of the Biodiversity Strategy for 2030;
  - They are based on similar projects that have proven positive results for biodiversity; and
  - An adequate and funded monitoring and reporting programme is included.[79]

- The Biodiversity Strategy Action Tracker and Dashboard provide a useful but partial overview of progress. Complete the indicators under development as soon as possible and keep the portal regularly updated.
- In the future, avoid action points requiring indicators which are too difficult to measure. It needs to be possible to measure progress on strategies from day one.

Recommendations to EU institutions and Member States on the next EU budget

- Separate a mandatory biodiversity spending target from other environmental objectives, as well as earmarked funding.
- Maintain and expand the LIFE programme.
- Establish a mandatory mechanism linking the EU budget, in particular national and regional partnership plans, to agreed and existing biodiversity objectives, especially obligations under the national restoration plans. This would help ensure that EU funds deliver on EU policy priorities and that sufficient financing is secured.
- Place a strong emphasis on reforms to ensure that outstanding issues with environmental legislation are addressed and that disbursements are explicitly linked to compliance.
- Implement reforms and investments to improve operational capacity at national, regional and local levels, thereby removing obstacles to programming and absorbing funds.
- Apply a sector-based approach to the 'do no significant harm' principle, including an exclusion list to prevent the use of EU funds for activities harmful to biodiversity.
- Adopt a transparent and participatory drafting and implementation process based on the European Code of Conduct on Partnership.[80]

[79] For full recommendations and further explanation, see Daniel Thomson, *How to determine the contribution of EU funds for biodiversity*.

[80] For our full analysis of biodiversity aspects of the proposed 2028 to 2034 EU budget, see Daniel Thomson, *The future of biodiversity financing: Where does it stand in the next EU budget?*.

Annex 1: Estonia, Hungary and Latvia's progress on implementing the Biodiversity Strategy

Estonia

The table below provides an overview of Estonia's progress in reaching the objectives of the Biodiversity Strategy for 2030 so far. It covers only those actions where data is available, as even on the EU level several indicators are still under development.

Objective	Estonia's progress so far
Legally protect a minimum of 30 per cent of the EU's land area and 30 per cent of the EU's sea area and integrate ecological corridors as part of a true Trans-European Nature Network.	In 2023, 17.9 per cent of the land area of Estonia was covered by Natura 2000 (EU coverage: 18.6 per cent). With 18.7 per cent of its marine waters covered by Natura 2000, Estonia surpasses the EU average of 12.1 per cent. Including nationally designated protected areas other than Natura 2000, Estonia legally protects 21 per cent of its terrestrial area (EU-27 coverage: 26.1 per cent) and 18.7 per cent of its marine area (EU-27 coverage: 12.3 per cent).[81] Estonia's Environmental Development Plan[82] states that the landscape connectivity index was 3.34 in 2019, without providing further details on what this means, and only sets a goal of non-deterioration by 2030. Data for 2023 on the ecological corridors network area by municipality; their quality on a scale from 0 to 10; and the percentage of land classified as having good, medium, or poor connectivity show that in all locations, the majority of ecosystems have poor connectivity.[83]
Strictly protect at least one-third of the EU's protected areas, including all remaining primary and old-growth forests.	According to the IUCN strict protection category, by the end of 2023 about 4 per cent of Estonia's territory was under strict protection, so less than a quarter of its protected areas.[84]
Effectively manage all protected areas, defining clear conservation objectives	Estonia has taken the task of managing protected areas quite seriously and on 17 March 2023 the government announced it had approved updated protection regulations for protected areas that required

[81] European Commission, Commission Staff Working Document, 2025 Environmental Implementation Review Country Report - Estonia, SWD(2025)307, *European Commission*, 7 July 2025.

[82] Kliimaministeerium, *Keskkonnavaldkonna arengukava (KEVAD), Eelnõu 4. mustand*, *Kliimaministeerium*, 4 August 2023.

[83] Estonian Environment Agency, LISA - Ökosüsteemide sidusus rohevõrgustikus 2023, *Estonian Environment Agency*, 2023.

[84] Estonian Environment Agency, Kaitstavate alade pindala ja osakaal territooriumist, *Keskkonnaportal*, updated 3 October 2025.

and measures, and monitoring them appropriately.	reviewing and updating. This completed several years of work by the Ministry of the Environment, during which all protection regulations were aligned with the Nature Conservation Act.[85] However, a June 2023 study identified several remaining weaknesses in Estonia's management of protected areas, including the lack of a common methodology for setting conservation objectives and measures; lack of consistent indicators used at a site level to track progress towards set objectives; lack of causal links made in evaluations between measures taken and ecological outcomes; fragmented data collection making evaluations more difficult; and challenges in understanding threats and pressures on protected areas, particularly the effect of cumulative pressures.[86]
By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30 per cent reach favourable conservation status or at least show a positive trend.	As of October 2025, Estonia is putting together the expert groups for its restoration plan. These groups will include only researchers and civil servants, not civil society organisations. The Farmland Bird Composite Index declined in Estonia by 45.9 per cent from 1984 to 2022. Between 2000 and 2022, the population index of farmland breeding birds declined by 34 per cent in Estonia, close to the average of 33 per cent in the European Union. In 2023, the population index was 66 per cent (year 2000 = 100 per cent). In 2007, an estimated 26 per cent of species had a favourable conservation status, increasing to 54 per cent in 2013 and 56 per cent in 2019. In Estonia, mammals were in the best condition, while amphibians and reptiles had the lowest proportion of species with a favourable status. From 2001 to 2006, 7 per cent of species had a bad status, with this percentage subsequently increasing to 8 per cent from 2007 to 2021 and 9 per cent from 2013 to 2018.[87] The population of forest breeding birds in Estonia has stabilised. Although the decline in forest bird populations has levelled off over the past five years, their numbers have still not recovered to the levels recorded before the turn of the century. In 2023, the population index was 85 per cent (year 2000 = 100 per cent).[88] Between 2017 and 2019, the Estonian species Red List was updated with the fifth regional assessment of endangerment. The assessment covered

[85] Estonian Environment Agency, 'The protection rules for Estonian protected areas have been brought into line with the Nature Conservation Act', *Estonian Environment Agency*, 17 March 2023.

[86] Trinomics, *Framework for Assessment of Effectiveness of Biodiversity Conservation Measures in Estonia*, *Environmental Agency*, 1 June 2023.

[87] Estonian Environment Agency, Keskkonnaülevaade - liigid, *Keskkonnaportal*, updated 23 May 2025.

[88] Ibid.

	more than 13,500 species; of the 12,399 species assessed, 106 (1 per cent) were classified as extinct in the region (RE), 928 species (8 per cent) were endangered (CR+EN+VU), and 6,059 species (49 per cent) were deemed to be of least concern (LC). In addition, 473 species (4 per cent) qualified as near threatened (NT). In the case of 4,833 species (38 per cent), the data were too deficient to assess (DD).[89] As of 2022, 31 per cent of surface water bodies were in good overall status, 32 per cent in moderate overall status, 36 per cent in poor overall status, and less than 1 per cent in very poor overall status. No water bodies were in very good overall status. Of the flowing water bodies, 35 per cent were in good overall status, while only 9 per cent of lakes achieved good status.[90]
The decline in pollinators is reversed.	Despite annual fluctuations in numbers, which are common in insect populations, the trends in bumblebee abundance and species richness are stable across all support types and regions. This means that, overall, the status of pollinators in Estonia's agricultural landscape is at least good. Based on data from comprehensive monitoring, the butterfly population index in 2023 and 2024 was about 30 per cent lower than in 2007 and 2008.[91]
At least 10 per cent of agricultural area is under high-diversity landscape features.	In 2022, 5.6 per cent of Estonia's agricultural area was under high-biodiversity landscape features, the same as the EU average.[92]
At least 25 per cent of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.	Out of Estonia's total agricultural land area, 22.4 per cent is under organic farming management, well above the EU average of 9.1 per cent.[93]

[89] Regionaal- ja Põllumajandusministeerium, *Põllulindude arvukuse ja liigirikkuse uuring 2010.-2023. aasta kohta*, *Regionaal- ja Põllumajandusministeerium*, 2024.

[90] Estonian Environment Agency, Siseveekogude seisund, *Estonian Environment Agency*, updated 14 November 2024.

[91] Regionaal- ja Põllumajandusministeerium, *Kimalaste mitmekesisuse ja arvukuse uuring*, *Regionaal- ja Põllumajandusministeerium*, 2025.

[92] European Commission, Biodiversity Strategy Dashboard, indicator updated September 2024.

[93] European Commission, Biodiversity Strategy Dashboard, indicator updated September 2025.

Three billion new trees are planted in the EU, in full respect of ecological principles.	In 2022, 18 million young trees were planted in private forests.[94] Each year, the State Forest Management Centre plants around 20 million trees.[95] However, the forest stock has decreased by approximately 4.2 per cent (19.7 million cubic metres) over the past five years (2020 to 2024). This decline has now started to slow down, but Estonian forests are becoming younger, and the area of old-growth forests is decreasing.[96]
Significant progress has been made in the remediation of contaminated soil sites.	Between 2006 and 2016, 103 contaminated sites were remediated in Estonia, but no information seems to be available for the period since the Biodiversity Strategy was published.[97]
At least 25,000 kilometres of free-flowing rivers are restored.	European/national reports and project descriptions provide partial data on a project-by-project basis, but there does not appear to be a publicly available comprehensive account of the total length of all restoration work in Estonia. The Pärnu river restoration involved the restoration of a total of 3,300 kilometres of interconnected river systems. This is the largest river restoration initiative in Estonia and a leading example of river restoration across Europe.[98]
The losses of nutrients from fertilisers are reduced by 50 per cent, resulting in the reduction of the use of fertilisers by at least 20 per cent.	Estonia has been going in the wrong direction, as the concentration of nitrate in groundwater increased by 27.2 per cent between 2000 and 2021 instead of decreasing, and the concentration of nitrate in rivers increased by 29 per cent.[99] However, these percentages likely reflect a low starting point, as EEA data on the percentage of rivers with different nitrate concentrations from 2020 to 2022 shows Estonia as having room for improvement, but not among the worst EU Member States.[100] Phosphorus concentration in rivers decreased by 37.1 per cent and in lakes by 44 per cent over the period from 2000 to 2021.[101]

[94] The Baltic Times, 'Estonia's private forest owners set record for tree planting in 2022', *the Baltic Times*, 31 March 2023.

[95] State Forest Management Centre, Riigimets uueneb: RMK paneb tänavu kasvama üle 20 miljoni puu, *State Forest Management Centre*, 16 April 2025; Leevi Lillemäe, 'Fewer forests to be planted in Estonia this spring than before', *ERR*, 18 April 2025.

[96] Estonian Environment Agency, Keskkonnaülevaade - mets, accessed 20 October 2025.

[97] European Commission, Biodiversity Strategy Dashboard, indicator updated October 2023.

[98] Interreg Europe, Restoration of the Pärnu River Basin ecosystem and free flow of the river, *Interreg*, 22 October 2024.

[99] European Commission, Biodiversity Strategy Dashboard, indicator updated April 2024.

[100] European Environment Agency, Status of nitrates in rivers in European countries, *European Environment Agency*, last updated 6 May 2025.

[101] European Commission, Biodiversity Strategy Dashboard, indicator updated April 2024.

Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.	It is not clear how many towns and cities already have such plans, but from EU cohesion funds, EUR 1,275,000 has been allocated for the preparation of Urban Greening Plans and for improving biodiversity in cities.[102]
The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.	As of 2023, Estonia's sea area had not reached good environmental status. It was also predicted that some of the parameters used to measure its status would not be classified as 'good' by 2030 and that exemptions to the goal of achieving good environmental status and/or environmental targets would be needed for eutrophication, hazardous substances and biodiversity (abundance and distribution of ringed seals) due to the natural characteristics of the Baltic Sea (enclosed sea area, long residence time) and climate change (reduction of ice cover).[103]
At least EUR 20 billion per year in public and private funding at national and EU levels 'should be' unlocked for spending on nature. A 'significant proportion' of the 25 per cent of the EU budget dedicated to climate action will be invested in biodiversity.	According to the European Commission's 2025 Environmental Implementation Review, Estonia's investment needs for biodiversity and ecosystems are estimated to be EUR 710 million per year from 2021 to 2027: • Estonia's Prioritised Action Framework (PAF), concerning the Natura 2000 areas: EUR 43.5 million per year, mostly running costs; • additional Biodiversity Strategy costs: EUR 480 million per year on top of the framework; • sustainable soil management costs: EUR 187 million per year. The current level of biodiversity financing is estimated to be EUR 119 million per year from 2021 to 2027. Of this, 78.9 per cent is considered direct financing to biodiversity and ecosystems. This leaves an investment gap of almost EUR 600 million per year, or 1.63 per cent of Estonia's GDP.[104] In other words, spending is one-sixth of what is needed, which is much worse than the EU average of around three-fifths as estimated by the IEEP/Trinomics. An estimated 6.7 per cent of current financing should come from EU cohesion policy, 48 per cent from the common agricultural policy, 9.5 per cent from Horizon Europe and around 3.7 per cent from LIFE. The EU

[102] Environmental Investment Centre (KIK), Kohalike energia- ja kliimakavade rakendamine ning rohestamiskavade koostamine ja neis toodud tegevuste elluviimine, *Environmental Investment Centre (KIK)*, 2024.

[103] Ministry of Environment, Estonian Marine Strategy Programme of Measures (updated in 2023) – Summary, *Finland Environmental Administration Online Service*, 2023.

[104] European Commission, Commission Staff Working Document, 2025 Environmental Implementation Review Country Report - Estonia, SWD(2025)307, *European Commission*, 7 July 2025.

	MFF altogether accounts for 72 per cent of the financing and the Recovery and Resilience Facility for 2 per cent, adding up to a total of 74 per cent from the EU budget. The other 26 per cent comes from national sources. At 1.9 per cent, Estonia's share of Recovery and Resilience Facility funding dedicated to supporting measures for biodiversity is above average. Estonia has also programmed 22.6 per cent of its common agricultural policy budget for 2021 to 2027 for measures dedicated to supporting biodiversity – above the EU average. However, only 2.2 per cent of the EU contribution to Estonia's cohesion policy funding is estimated to contribute to biodiversity, which is less than half of the EU average.[105]

Recommendations for Estonia

- Although the country is doing reasonably well at using Recovery and Resilience Facility and common agricultural policy funds for biodiversity, Estonia needs to increase its overall biodiversity financing, either from EU funds or domestic sources such as user fees.
- The country should take urgent action to decrease the concentration of nitrates in groundwater and rivers.
- Although protected land areas under Natura 2000 are close to the EU average, Estonia needs to speed up in order to protect 30 per cent by 2030. Strictly protected areas need to be increased. Management of protected areas needs to be further improved.
- Estonia must properly apply the Habitats Directive to ensure more sustainable forest management.
- Preparation of the country's Nature Restoration Plan needs to speed up; proper consultation with all relevant stakeholders including environmental civil society organisations needs to be ensured.

[105] European Commission, Commission Staff Working Document, 2025 Environmental Implementation Review Country Report - Estonia, SWD(2025)307.

Hungary

The table below provides an overview of Hungary's progress in reaching the objectives of the Biodiversity Strategy for 2030 so far. It covers only those actions where data is available, as even on the EU level several indicators are still under development.

Objective	Hungary's progress so far
Legally protect a minimum of 30 per cent of the EU's land area and 30 per cent of the EU's sea area and integrate ecological corridors as part of a true Trans-European Nature Network.	According to the European Commission's 2025 Environmental Implementation Review, 21.4 per cent of the country's territory was part of Natura 2000 in 2023 (EU-27 coverage: 18.6 per cent), and 22.2 per cent of its terrestrial area was protected in total in 2022 (EU-27 coverage: 26.1 per cent).[106] As of 2020, Hungary reported that its National Ecological Network[107] covered 36.18 per cent of its territory.[108] The network includes ecological corridors; these are not protected, but some restrictions apply.
Strictly protect at least one-third of the EU's protected areas, including all remaining primary and old-growth forests.	According to Hungary's state statistical bureau, 15 per cent of protected natural areas were strictly protected as of 2023.[109] As of 2016, according to WWF Hungary, only approximately 33 per cent of old growth forests were protected,[110] and the situation has not improved significantly since then.
Effectively manage all protected areas, defining clear conservation objectives and measures, and monitoring them appropriately.	A 2023 assessment stated that 11 per cent of the territory covered by Natura 2000 and 45.6 per cent covered by nationally protected areas does not have a management plan.[111]
By 2030, significant areas of degraded and carbon-rich ecosystems are restored;	As of October 2025, there has been no progress made on the national restoration plan. The Ministry of Agriculture is preparing a government decree to share tasks between sectors and departments.

[106] European Commission, Commission Staff Working Document, 2025 Environmental Implementation Review Country Report - Hungary, SWD(2025) 312 final, *European Commission*, 7 July 2025.

[107] Ministry of Agriculture, Országos Ökológiai Hálózat, *Ministry of Agriculture*, accessed 15 October 2025.

[108] Ministry of Agriculture, *Az 5. Nemzeti Környezetvédelmi Program 1. Melléklete, Nemzeti Természetvédelmi Alapterv V. A természetvédelem szakpolitikai stratégiája 2021–2026*, *Ministry of Agriculture*, 2020, 67.

[109] Hungarian Central State Statistical Office, 3.8. Az országos és a helyi jelentőségű védett területek aránya, *Hungarian Central State Statistical Office*, 2024.

[110] WWF Hungary, 'Old-growth forests in Hungary in danger', *WWF Hungary*, June 2016.

[111] Ministry of Agriculture, A biologiai sokféleség mégorzésének 2030-ig szolo némzéti stratégiaja, *Ministry of Agriculture*, August 2023.

habitats and species show no deterioration in conservation trends and status; and at least 30 per cent reach favourable conservation status or at least show a positive trend.	As across the EU, Hungary's farmland birds showed a decline between 1999 and 2020, although at a slower pace than the EU as a whole. Its forest birds showed an increase.[112]
The decline in pollinators is reversed.	No comprehensive data is available, but Hungary is part of the SPRING project, which aims to increase monitoring.[113]
The risk and use of chemical pesticides is reduced by 50 per cent and the use of more hazardous pesticides is reduced by 50 per cent.	No data is available, but some initiatives are ongoing to help reach this goal. The CAP Strategic Plan requires beneficiaries to apply integrated pest management and ties payments to compliance with the Sustainable Use Directive (2009/128/EC). These requirements are stricter in agri-environmental interventions and eco-schemes. Use of low-risk pesticides and organic transition are incentivised.[114]
At least 10 per cent of agricultural area is under high-diversity landscape features.	Of Hungary's agricultural land area, 4.2 per cent is under high-diversity landscape features, below the EU total of 5.6 per cent.[115]
At least 25 per cent of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.	Of Hungary's agricultural land area, 6 per cent is under organic farming, far below the EU's already low total of 9.1 per cent.[116]
Three billion new trees are planted in the EU, in full respect of ecological principles.	The Ministry of Agriculture has a tree planting programme,[117] but not all of these are planted according to ecological principles. This programme plants 10,000 to 12,000 trees per year. Forestry companies and non-governmental organisations plant more – we estimate around 40,000 to 90,000 based on scattered data.

[112] Ibid.

[113] Magyar Biológiai Társaság, A Spring projekt, *Magyar Biológiai Társaság*, accessed 16 October 2025.

[114] Ministry of Agriculture, KAP stratégiai terv 2023-2027, version 5.1 ., *Ministry of Agriculture*, 2025.

[115] European Commission, Biodiversity Strategy Dashboard, indicator updated September 2024.

[116] European Commission, Biodiversity Strategy Dashboard, indicator updated September 2025.

[117] National Forestry Agency, Országfásítás, *National Forestry Agency*, accessed 16 October 2025.

The losses of nutrients from fertilisers are reduced by 50 per cent, resulting in the reduction of the use of fertilisers by at least 20 per cent.	The EU's Biodiversity Strategy Dashboard does not include data for Hungary for nitrates and phosphorus in water bodies and groundwater but initiatives exist to reduce nutrient loss. Hungary's Nitrates Regulation designates nitrate-vulnerable zones, limits manure application to 170 kilograms per hectare per year and monitors ground and surface water.[118] All farmers in nitrate-sensitive areas and those raising livestock in excess of the needs of their household are required to report on nitrates use, regardless of the sensitivity of the area. Hungary's CAP Strategic Plan interventions link payments to compliance with the Nitrates Directive.[119]
At least EUR 20 billion per year in public and private funding at national and EU levels 'should be' unlocked for spending on nature. A 'significant proportion' of the 25 per cent of the EU budget dedicated to climate action will be invested in biodiversity.	The Commission's 2025 Environmental Implementation Review estimates investment needs for biodiversity and ecosystems at EUR 1.5 billion per year in Hungary from 2021 to 2027: • Hungary's Prioritised Action Framework (PAF) for Natura 2000 areas: EUR 362 million per year, mostly running costs; • additional costs of implementation of the Biodiversity Strategy: EUR 737 million per year on top of the PAF; • sustainable soil management costs: EUR 383 million per year. The current level of biodiversity financing is estimated to be EUR 482 million per year from 2021 to 2027. The Commission considers 75.2 per cent of this to be direct financing to biodiversity and ecosystems. This leaves a nature investment gap of around EUR 1 billion per year, corresponding to 0.59 per cent of Hungary's GDP.[120] In other words, spending is one-third of what is needed, which is lower than the EU average of around three-fifths as estimated by the IEEP/Trinomics, but a higher proportion than Estonia spends. Of the total financing, an estimated 25.2 per cent should come from EU cohesion policy, 57 per cent from the common agricultural policy, 3.1 per cent from Horizon Europe, around 1.2 per cent from LIFE and none from the Recovery and Resilience Facility. Altogether, EU funds make up 87 per cent of the financing. The other 13 per cent comes from national sources. Hungary has allocated 17.6 per cent of its common agricultural policy budget for the period from 2021 to 2027 to measures for biodiversity – slightly below

[118] Ministry of Agriculture, *Nitrát gazdálkodói kézikönyv*, *Ministry of Agriculture*, 2025.

[119] Ministry of Agriculture, KAP stratégiai terv 2023-2027.

[120] European Commission, Commission Staff Working Document, 2025 Environmental Implementation Review Country Report - Hungary, SWD(2025) 312 final.

	the EU average of 18.6 per cent. From the EU contribution to Hungary's cohesion policy, 6.4 per cent is estimated to contribute to biodiversity – above the EU average of 5.9 per cent.[121]

Recommendations for Hungary

- The government needs to ensure better implementation and increased funding for nature conservation and protection. Nature conservation and climate adaptation need earmarked financial resources as there is currently too much competition between the sectors and these aspects are sidelined.
- The government needs to ensure independent auditing of compliance with the 'do no significant harm' principle (currently, it is self-declared).
- Biodiversity projects need to have substantive environmental assessments, systemic data collection on real environmental performance should be established and systematic *ex post* environmental monitoring is needed.
- Hungary needs to work harder on eliminating harmful subsidies. Unplanned *ad hoc* funding for climate change adaptation can even be harmful (e.g. a drought alleviation emergency fund during summer 2025 was used for unnecessary dredging).
- The government should set up standing bodies and committees for cross-sectoral cooperation in areas like agriculture, water management, nature conservation, and infrastructure development.
- The preparation of Hungary's Nature Restoration Plan needs to speed up; proper consultation with all relevant stakeholders including environmental civil society organisations needs to be ensured.

[121] Ibid.

Latvia

The table below provides an overview of Latvia's progress in reaching the objectives of the Biodiversity Strategy for 2030 so far. It covers only those actions where data is available, as even on the EU level several indicators are still under development.

Objective	Latvia's progress so far
Legally protect a minimum of 30 per cent of the EU's land area and 30 per cent of the EU's sea area and integrate ecological corridors as part of a true Trans-European Nature Network.	At the beginning of 2025, the total protected terrestrial area in Latvia was 18.73 per cent, including Natura 2000 and nationally designated sites, while Natura 2000 sites alone comprised 11.54 per cent of Latvia's land area.[122] Meanwhile, the total protected sea area was 16.03 per cent, and the Natura 2000 sea area was 15.72 per cent.[123] Recently, due to the European Commission opening infringement cases against Latvia for failing to provide sufficient protection measures,[124] the Nature Conservation Agency established more than 100 nature reserves to protect *Fennoscandian lowland species-rich dry to mesic grasslands* and *Fennoscandian deciduous swamp woods*.[125] In addition, a protected landscape area was created to protect the Western barbastelle.[126] The Nature Conservation Agency has been mapping scenarios to reach the 30 per cent target,[127] including area-based conservation measures, such as microreserves, river buffer strips, etc.[128] The Department of Nature Conservation of the Ministry of Smart Administration and Regional Development will propose a plan by the end of 2025.[129] Unfortunately, a network of ecological corridors has not yet been developed in Latvia. But the ongoing state research programme *HiQBioDiv* is modelling the spatial distribution of habitats suitable for the species listed in the

[122] Dabas aizsardzības pārvalde, *Īpaši aizsargājamo dabas teritoriju un mikroliegumu, kuri ir Eiropas nozīmes aizsargājamas teritorijas (Natura 2000), platība*, *Dabas aizsardzības pārvalde*, 2025.

[123] Ibid.

[124] European Commission, European Commission at Work: Infringement Decisions, Latvia, Environment, Nature, *European Commission*, 2025.

[125] Strode, G., *Aktualitātes dabas aizsardzības jomā 2024.gadā*, *Nature Conservation Agency*, 2024.

[126] Nature Conservation Agency, Koknese-Odziena, *Nature Conservation Agency*, 2025.

[127] Baltic Environmental Forum Latvia, Projekts Priekšlikumu sagatavošana aizsargāto teritoriju pārklājuma paplašināšanai Latvijas sauszemes teritorijā atbilstoši ES Bioloģiskās daudzveidības stratēģijas 2030 mērķiem: Pētījuma rezultāti, *Nature Conservation Agency*, 2022.

[128] Mendziņa, I., *Valsts pētījumu programma Bioloģiskās daudzveidības prioritāro rīcību programmā noteikto pētījumu izstrāde*, *Ministry of Smart Administration and Regional Development*, 2024.

[129] Ministry of Smart Administration and Regional Development, Informatīvais ziņojums Par aizsargājamo biotopu izplatības un kvalitātes apzināšanas rezultātiem un tālāko rīcību aizsargājamo biotopu labvēlīgas aizsardzības stāvokļa nodrošināšanai, *Ministry of Smart Administration and Regional Development*, 2024.

	Habitats and Birds Directives.[130] This could lead to a scientific basis for identifying sites necessary to protect and relevant corridors.
Strictly protect at least one-third of the EU's protected areas, including all remaining primary and old-growth forests.	Around six per cent of Latvia is strictly protected, including strict nature reserves, nature reserves, and other protected areas with a strict protection regime.[131] The Nature Conservation Agency is primarily planning to increase the protection regime in parts of existing protected areas to reach the 10 per cent goal, mainly in order not to affect new land.[132] Latvia's primary forests are included in protected areas, but old-growth forests remain under-protected. Their definition has been subject to debate in Latvia due to the revised Renewable Energy Directive (RED III), under which, if burnt for energy, wood from primary and old-growth forests is not considered sustainable and climate-neutral.[133] Thus transposing the Directive may in reality result in a downgrade in the status of old-growth forests.
Effectively manage all protected areas, defining clear conservation objectives and measures, and monitoring them appropriately.	In 2019 and 2020 Latvia received infringement notices from the European Commission since its Natura 2000 network did not cover all the habitat types and species that needed protection.[134] Moreover, site-specific conservation objectives and measures had not been set. In 2020 Latvia began to solve the issues within the LIFE LatViaNature project. Site-specific EU habitat conservation objectives were determined for 326 inland Natura 2000 sites[135] and national-level favourable reference values were set for 59 EU habitats, including favourable reference areas and favourable reference ranges.[136] Site-specific conservation objectives and favourable reference values, including favourable reference populations and favourable reference ranges, were also set for 85 animal species and 118 plant

[130] *Augstas izšķirtspējas bioloģiskās daudzveidības kvantificēšana dabas saglabāšanai un apsaimniekošanai: HiQBioDiv*, *University of Latvia*, s.a., accessed 3 November 2025.

[131] Ministry of Smart Administration and Regional Development, Informatīvais ziņojums Par aizsargājamo biotopu izplatības un kvalitātes apzināšanas rezultātiem un tālāko rīcību aizsargājamo biotopu labvēlīgas aizsardzības stāvokļa nodrošināšanai.

[132] Ministry of Smart Administration and Regional Development, VARAM: Bioloģiskās daudzveidības saglabāšanai ir nepieciešams stingri aizsargāt dabas vērtības 10 % Latvijas teritorijas, *Ministry of Smart Administration and Regional Development*, 2025.

[133] European Parliament and Council Regulation (EU) 2023/2413 of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652.

[134] European Commission, European Commission at Work: Infringement Decisions, Latvia, Environment, Nature, *European Commission*, 2025.

[135] Priede A. (red.), *Natura 2000 teritoriju līmeņa biotopu aizsardzības mērķi: saturs, metodika un rezultāti*, *Nature Conservation Agency*, *Latvijas Universitāte*, 2024.

[136] LIFE LatViaNature, Valsts līmeņa biotopu aizsardzības mērķi, *Nature Conservation Agency*, 2024.

	species listed in Annexes II, IV, and V of the Habitats Directive.[137] By the end of 2025 it is expected that national-level habitat protection plans will be developed for all 59 EU habitats.[138] The biodiversity monitoring programme in Latvia already includes Natura 2000 site monitoring and background (national) monitoring, special monitoring, and invasive species monitoring.[139] In order to adequately monitor all the relevant species, measurements need to be regular, thus continuous and targeted funding is necessary.[140]
By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30 per cent reach favourable conservation status or at least show a positive trend.	According to Latvia's latest national report to the European Commission under Article 17 of the Habitats Directive for 2019 to 2024, the status of most habitat types has been declining on a national level, compared to 2013 to 2019.[141] Out of the 61 habitats found in Latvia, 10 per cent had a favourable status, 28 per cent unfavourable-inadequate and 61 per cent unfavourable-bad, while for 1 per cent the status was unknown.[142] The status of grasslands, wetlands and freshwater habitats has improved, likely due to protection and restoration efforts, but is still largely unfavourable-bad (grasslands) and unfavourable-inadequate (wetlands).[143] And the status of forests, heathlands, dunes, coastal and rocky habitats has plunged, particularly forest and dune habitats which are now mostly in a bad condition.[144] Scrub habitats have remained steady, with an unfavourable-bad status.[145] The protection status of species in the 2019 to 2024 report was also unsatisfactory.[146] For 36 per cent of the species it was favourable, 39 per cent unfavourable-inadequate, 13 per cent unfavourable-bad, and 12 per cent

[137] Opermanis, O., Auniņš, A. and Priede, A., *Sugu populāciju novērtēšana un aizsardzības mērķi ES Biotopu direktīvas II, IV, V pielikumu sugām*, *Nature Conservation Agency, Latvijas Universitāte*, 2025.

[138] LIFE LatViaNature, Rezultāti, *Nature Conservation Agency*, s.a., accessed 3 November 2025.

[139] Nature Conservation Agency, Bioloģiskās daudzveidības monitorings, *Nature Conservation Agency*, 2020.

[140] Opermanis, O., Auniņš, A. and Priede, A., *Sugu populāciju novērtēšana un aizsardzības mērķi ES Biotopu direktīvas II, IV, V pielikumu sugām*, *Nature Conservation Agency, Latvijas Universitāte*, 2025.

[141] Nature Conservation Agency, *Informatīvais ziņojums Pārskats par ziņojumu par Padomes 1992. gada 21. maija direktīvas 92/43/EEK par dabisko dzīvotņu, savvaļas faunas un floras aizsardzību ieviešanu 2019.-2024. gadā*, *Nature Conservation Agency*, 2025.

[142] Ibid.

[143] Ibid.

[144] Ibid.

[145] Ibid.

[146] Ibid.

	unknown.[147] From the previous reporting period, the state had worsened for fish, mammals and vascular plants, but had improved for amphibians and non-vascular plants.[148] For arthropods, slugs and lizards it had stayed largely the same.[149] Latvia is also taking part in the European wide long-term monitoring of common breeding forest and farmland birds of the boreal forest region.[150] From 2005 until 2023 there was a slight decrease of the forest birds and farmland birds indices.[151] Further research is required, but in general, the key threats to habitats and species in Latvia are economic activities, especially forestry and agriculture.[152] Work on Latvia's Nature Restoration Plan began late 2024, with the relevant authorities coming together and deciding upon responsibilities, but then faltered. In September 2025, the Ministry of Smart Administration and Regional Development invited stakeholders to take part in a working group, to begin meeting in November.[153] Both industry spokespeople and nature experts will be represented. The ministry has stated that until 2030 they will focus on activities in Natura 2000 sites, with restoration activities to take place primarily on public land, as well as limiting the worsening of the conservation status of species.[154]
The decline in pollinators is reversed.	The status of grassland butterflies is not monitored in Latvia, but butterfly and moth population multi-species indicator (MSI) indices are calculated. The index for 2024 is 171.06 for the common butterfly species, representing a stable trend since 2016.[155] For moths, the MSI index is 50.27, representing a sharp decrease since monitoring began in 2018.[156] The reason for the decline needs further research. Although the bad conservation status of grassland

[147] Ibid.

[148] Ibid.

[149] Ibid.

[150] Mārdega, I., and Auniņš, A., *Dienas putnu valsts monitorings: Gala atskaite par 2023. gadu*, *Latvian Ornithological Society*, 2023.

[151] Ibid.

[152] Ibid.

[153] Ministry of Smart Administration and Regional Development, Rīkojums Par darba grupas nacionālā dabas atjaunošanas plāna izstrādei izveidošanu un uzdevumu noteikšanu, 2025.

[154] Ministry of Smart Administration and Regional Development, Nacionālā atjaunošanas plāna izstrādes process, 2025.

[155] Atskaite par bezmugurkaulnieku valsts (fona) monitoringa (2023.-2025. gads) 2024. gada lauka pētījumu sezonas rezultātiem, *Nature Conservation Agency*, 2025.

[156] Ibid.

	habitats in Latvia and their limited extent might have an effect on grassland butterfly populations.
The risk and use of chemical pesticides is reduced by 50 per cent and the use of more hazardous pesticides is reduced by 50 per cent.	Pesticide sales in Latvia increased by around 56 per cent from 2011 to 2023.[157] From 2011 to 2021 the sales had grown by 85 per cent, the highest increase in the EU,[158] but decreased from 2021 to 2023. Latvia has had an Action Plan for the Sustainable Use of Plant Protection Products since 2019, but environmental NGOs have pointed out that it is ineffective.[159] The State Plant Protection Service maintains that the increase in pesticide sales is due to longer vegetation periods because of climate change, the increasing use of productive and demanding varieties, the introduction of low-till farming and the expansion of agricultural lands,[160] but the increase has not been proportional to pesticide sales.[161]
At least 10 per cent of agricultural area is under high-diversity landscape features.	According to the European Commission Joint Research Centre, in 2022, the share of agricultural land covered by non-productive landscape features in Latvia in 2022 was 4.3 per cent, one of the lowest shares in the EU (5.6 per cent average).[162] The Commission's amendments to the CAP basic regulations in 2024, removing the obligation for farmers supported by CAP to have at least three to four per cent of non-productive area or landscape features on their land, risks decreasing the share even further, although obligations remain to maintain existing landscape features.[163] In its place a new eco-scheme has been introduced in Latvia's Common Agricultural Policy Strategic Plan: farmers will receive CAP support, if at least one per cent of their arable land is covered by landscape features.[164]

[157] Eurostat, Pesticide sales, *Eurostat,* 2025.

[158] LSM.lv Editorial Office for News, 'Eurostat dati: Latvijā vērojams straujākais pesticīdu tirdzniecības pieaugums', *Latvian Public Media*, 2023.

[159] Kropa-Kaļužnaja, S., 'Latvijā audzis izmantoto pesticīdu daudzums: Ko tas nozīmē?', *Latvian Public Media*, 2021.

[160] State Plant Protection Service, Augu aizsardzības līdzekļu statistika, *State Plant Protection Service*, 2023.

[161] Eurostat, Utilised agricultural area by categories, *Eurostat*, 2025.

[162] D`andrimont, R. et al., *Estimation of the share of Landscape Features in agricultural land based on the LUCAS 2022 survey*, *European Commission's Joint Research Centre*, Publications Office of the European Union, 2024.

[163] Directorate-General for Environment, Commission staff working document 2025: Environmental Implementation Review Country Report - Latvia, *European Commission*, 2025.

[164] Ministry of Agriculture, Atvieglojot tiešo maksājumu saņemšanas nosacījumus, lauksaimniekiem ir iespēja pieteikties jaunam ekoshēmas atbalstam, *Latvijas Vēstnesis*, 2025.

At least 25 per cent of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.	In 2023, 15.08 per cent of utilised agricultural land was under organic farming in Latvia[165] – more than 5 per cent above the EU average.[166] The share has increased almost tenfold since 2004, with a steady rise since 2006. The growth was more so driven by an expansion of the organic food market, rather than the result of targeted policy. Nevertheless, in 2023 Latvia approved its Organic Farming Development Action plan 2023-2030, aiming to increase the share to 25 per cent by 2030.[167] Both rural support and direct payments, such as eco-schemes (7 in total in 2025), are offered to farmers in Latvia for agro-ecological practices, including organic farming. But the 2024 progress report of the Strategic Plan shows that many interventions have not reached the expected results and some have not been carried out at all.[168] The management of organic soils in agriculture has one of the highest levels of greenhouse gas emissions in Latvia, not only in the land use, land use change and forestry (LULUCF) sector, but overall.[169] And this may get worse since a recent Commission "simplification" package included an amendment to the obligation to protect peatlands and wetlands,[170] turning it into an optional measure.[171]
Three billion new trees are planted in the EU, in full respect of ecological principles.	The Latvian Rural Advisory and Training Centre has begun a public campaign during Autumn 2025, asking people to participate in planting trees, either individually or jointly, to meet the EU goal.[172] In order to keep track of the amount planted, people are asked to register in the *MapMyTree* EU platform. Municipalities too have already taken part, stating record numbers of trees planted in a year.[173]

[165] Eurostat, Area under organic farming, *Eurostat*, 2025.

[166] European Commission, EU Biodiversity Strategy Dashboard, *European Commission*, s.a., accessed 3 November 2025.

[167] Ministry of Agriculture, Bioloģiskās lauksaimniecības attīstības rīcības plāns 2023.–2030. gadam, *Ministry of Agriculture*, 2023.

[168] Ministry of Agriculture, Annual Performance Report - CAP Strategic plan, Ministry of Agriculture, 2025.

[169] Latvian Environment, Geology, and Meteorology Centre, Annexes to the Latvia`s National Inventory Document 1990-2023, *IPCC*, 2025.

[170] European Commission, Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) 2021/2115 as regards the conditionality system, types of intervention in the form of direct payment, types of intervention in certain sectors and rural development and annual performance reports and Regulation (EU) 2021/2116 as regards data and interoperability governance, suspensions of payments annual performance clearance and controls and penalties, *European Commission*, 2025.

[171] Ibbot, S., *Nature and climate protection takes another major hit in EU proposal to "simplify" agricultural policy*, *European Environmental Bureau*, 2025.

[172] Solosteja, L., *Pievienojies ES iniciatīvai "Par 3 miljardiem koku vairāk"!*, *Latvian Rural Advisory and Training Centre*, 2025.

[173] Department of External Communication, Rīgas ielās šogad iestādīs rekordlielu koku skaitu – vairāk nekā 1400; iesākto kursu uz zaļāku pilsētu turpinās arī nākamgad, *Riga City Council*, 2023.

	The state forestry company also boasts about planting up to 30 million trees yearly.[174] But the felling area and the yearly volume of the timber harvest has increased significantly since the beginning of the 90s, both in state forests and in total, leading to a decrease in the forest reserve.[175] In order for the trees planted by the state forest company to contribute to the EU target, additionality needs to be ensured.[176] Latvia's reports to the IPCC show harvesting as one of the key reasons for the LULUCF sector losing its status as a carbon sink since 2022.[177] The forestry sector has made use of current crises to push for changes in legislation without proper impact assessments, for example an increase of harvesting volumes in state forests to increase the state budget for defence.[178]
Significant progress has been made in the remediation of contaminated soil sites.	279 sites were recognised as contaminated and 2611 sites as potentially contaminated in Latvia in 2024, as well as 744 either remediated or dismissed as unpolluted.[179] The majority of the polluted sites were oil depots, gas stations, production facilities, landfills or wastewater treatment plants, frequently from the Soviet period.[180] In the last 20 years the number has been rising due to increased surveying. Remediation has been limited, but with the help of EU programmes and other funds, rehabilitation efforts are being boosted, e.g. the Inčukalns acid tar ponds.[181]
At least 25,000 km of free-flowing rivers are restored.	Latvia is rich in surface waters, with rivers estimated at more than 37 thousand kilometres in length.[182] Unfortunately, many have been channelled

[174] JSC Latvia's State Forests, Pavasara meža atjaunošanas sezonā iestādīti gandrīz 30 miljoni jaunu koku, *JSC Latvia's State Forests*, 2025.

[175] Official Statistics Portal, Felling areas and stock volume, *Official Statistics Portal*, accessed 3 November 2025.

[176] European Commission, EU Biodiversity Strategy Dashboard, Number of trees planted in the EU as part of the 3 Billion Trees Pledge, *European Commission*, 2025.

[177] Latvian Environment, Geology, and Meteorology Centre, Latvia`s National Inventory Document under the UNFCCC and Paris Agreement: Greenhouse Gas Emissions in Latvia from 1990 to 2023, *IPCC*, 2025.

[178] Zvirbulis, Ģ., 'Iztukšot mežus, lai pildītu valsts budžetu? Apspriež koku ciršanas apjomu palielināšanu', *Latvian Public Media*, 2025.

[179] State Environmental Service, Piesārņoto vietu pārvaldības modeļa digitālā transformācija, *State Environmental Service*, 2024.

[180] Latvian Environment, Geology, and Meteorology Centre, Nacionālais ziņojums par vides stāvokli 2020.-2023., *Latvian Environment, Geology, and Meteorology Centre*, 2024.

[181] Demidovs, V., 'Teju par 60 miljoniem eiro pabeigta Inčukalna sērskābā gudrona dīķa sanācija', *Latvian Public Media*, 2023.

[182] LIFE GoodWater, Fakti par saldūdens resursiem Latvijā, *LIFE GoodWater*, s.a., accessed 3 November 2025.

	and connected with ditches in order to drain the land around, harming the ecological status of the water bodies.[183] In addition, three large hydroelectric plants on the Daugava, the biggest river in Latvia, make up around 40 to 60 per cent of the country's annual domestic electricity generation.[184] But around 150 small plants on more than 100 smaller waterways were also built as a result of misguided incentives.[185] They have proven harmful for biodiversity[186] and they generate only around one to two per cent of Latvia's electricity.[187] These small plants are slowly being dismantled, but progress is very slow. The number of kilometres of freed river stretches is unknown. Research shows around 2000 weirs on rivers in Latvia and as many as 30,000 problematic culverts.[188] In 2022, Institute of Food Safety, Animal Health and Environment BIOR created a database of 70 barriers to fish migration, with measures for improving the situation, including the total removal of the obstacle.[189]
There is a 50 per cent reduction in the number of Red List species threatened by invasive alien species.	No data is available. But due to the bureaucratic burden involved, in almost the last 20 years the only species listed as invasive in Latvia has been Sosnowsky's hogweed.[190] The law states that for all invasive species, containment measures have to be defined and the landowner must follow them.[191] Experts within the LIFE LatViaNature project are trying to change that by updating the legislative procedure and developing guidelines (published in 2025) for performing a risk analysis of alien species and determining the need to include them in the list of invasives, as well as for identifying management measures to limit their spread and reduce their negative impacts.[192]

[183] Latvian Environment, Geology, and Meteorology Centre, Pārskats par virszemes un pazemes ūdeņu stāvokli 2023. gadā, Latvian Environment, *Geology, and Meteorology Centre*, 2024.

[184] JSC Augstsprieguma tīkls, Elektroenerģijas tirgus apskati, *JSC Augstsprieguma tīkls*, 2025.

[185] Foundation Pasaules dabas fonds, Mazās HES, *Foundation Pasaules dabas fonds*, s.a., accessed 3 November 2025.

[186] Zvirbulis, O., *Zinātnieku pētījumi apstiprina, ka mazie HES rada kaitējumu upju ekosistēmām*, *Ministry of Smart Administration and Regional Development*, 2019.

[187] Ambote, S., 'Ar 2 miljonu eiro atbalsta programmu upju šķēršļu nojaukšanai cer uzlabot zivju migrāciju', *Latvian Public Media*, 2023.

[188] Foundation Pasaules dabas fonds, Kopā par tīrām upēm!, *Foundation Pasaules dabas fonds*, 2023.

[189] Institute of Food Safety, Animal Health and Environment BIOR, Noskaidrotas zivīm nozīmīgākās Latvijas upes un svarīgākie tajās esošie zivju migrācijas šķēršļi, *BIOR, s.a.*, accessed 3 November 2025.

[190] Cabinet of Ministers, Rules of the Cabinet of Ministers No. 468, Invazīvo augu sugu saraksts, 2008.

[191] Helmane, I., *Veidos Latvijas invazīvo sugu sarakstu; noteiks atbildību zemes īpašniekiem*, *Latvijas Vēstnesis*, 2024.

[192] University of Daugavpils, Vadlīnijas sugu iekļaušanai Latvijas invazīvo sugu sarakstā, *LIFE LatViaNature*, 2021.

	The experts are also testing five methods for controlling the species and monitoring the results,[193] and have developed a list of 24 species that should be included in the official list.[194] Meanwhile, citizen science is being used to collect invasive species distribution data.[195]
The losses of nutrients from fertilisers are reduced by 50 per cent, resulting in the reduction of the use of fertilisers by at least 20 per cent.	Latvia has been going in the wrong direction, as the concentration of nitrate in groundwater between 2000 and 2021 increased by a massive 1,636.5 per cent instead of decreasing, and the concentration of nitrate in rivers increased by 141.6 per cent.[196] However, these percentages likely reflect a low starting point, as EEA data on the percentage of rivers with different nitrate concentrations from 2020 to 2022 shows Latvia as having room for improvement, but not among the worst EU Member States.[197] Still, in many of the monitoring sites, both surface water and groundwater, limits set in the Nitrates Directive have been topped, including in nitrate sensitive areas.[198] Phosphorus concentration in rivers decreased by 42 per cent over the 2000 to 2021 period.[199] No data is available for the phosphorus level in lakes. While the increase in nutrients from fertilisers in Latvian surface water bodies mainly results from the low initial level of use, consumption of inorganic fertilisers has been increasing fast.[200] One of the reasons for the high rate of nutrient pollution is over-fertilisation of crops, especially winter crops.[201] Part of the pollution can be attributed to fertiliser use in other countries, where many of the larger rivers begin,[202] but the nutrient content at the mouths of rivers shows a significant increase, pointing to domestic pollution too.[203]

[193] LIFE LatViaNature, Invazīvo sugu ierobežošanas teritorijas, *LIFE LatViaNature, s.a.*, accessed 3 November 2025.

[194] University of Daugavpils, 24 prioritāro sugu saraksts, *LIFE LatViaNature*, 2022.

[195] LIFE LatViaNature, Invazīvo sugu pārvaldnieks, *Natural data management system OZOLS, s.a.,* accessed 3 November 2025.

[196] European Commission, Biodiversity Strategy Dashboard, indicator updated April 2024.

[197] European Environment Agency, Status of nitrates in rivers in European countries.

[198] Latvian Environment, Geology, and Meteorology Centre, Pārskats par virszemes un pazemes ūdeņu stāvokli 2023. gadā, *Latvian Environment, Geology, and Meteorology Centre*, 2024.

[199] European Commission, Biodiversity Strategy Dashboard, indicator updated April 2024.

[200] Eurostat, Consumption of inorganic fertilizers, *Eurostat*, 2025.

[201] Centre for Environmental Policy, Latvian Environment, Geology and Meteorology Centre, Environmental analysis: ecological status of Venta and Lielupe RBD water bodies and pollution reduction goals, *Interreg Catch Pollution*, 2017.

[202] Ministry of Agriculture, Padomes Direktīvas 91/676/EEK attiecībā uz ūdeņu aizsardzību pret piesārņojumu, ko rada lauksaimnieciskas izcelsmes nitrāti ziņojums Eiropas Komisijai par 2016.-2019. gadu: Latvija, *Ministry of Agriculture*, 2020.

[203] Centre for Environmental Policy, Latvian Environment, Geology and Meteorology Centre, Environmental analysis: ecological status of Venta and Lielupe RBD water bodies and pollution reduction goals, *Interreg Catch Pollution*, 2017.

Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.	The only city with at least 20,000 inhabitants known to be developing an Urban Greening Plan in Latvia is the capital city, Riga.[204] Within the LIFE LatEstAdapt project, experts together with local authority representatives analysed the need to ensure ecosystem services in the city, particularly heat island mitigation and rainwater collection, and defined areas where greening should take place. To involve Rigans in decision-making, the local authority together with environmental NGO Green Liberty organised a citizens' assembly, where a representative group of people deliberated what kind of nature-based solutions they felt were needed in the city and which measures could support the expansion of green areas, altogether developing 41 recommendations.[205] Part of the project has been completed – the development of a green infrastructure development project for part of the historical centre, where space is limited, but climatic issues are prevalent.[206] The result of the efforts will be an Urban Greening Plan 2027 to 2031, complemented by an Action Plan.
The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status	In 2024, during the project *Research to raise knowledge capacity needed to implement maritime policy* financed by the EU Maritime, Fisheries and Aquaculture Fund, the Latvian Institute of Aquatic Ecology developed the Marine Environmental Status Report for 2017-2021.[207] A good environmental status was indicated only for distribution of non-invasive species, irreversible changes due to shifts in the hydrographic regime, pollutant levels in seafood, and underwater noise. The indicators for biological diversity, commercially important fish species, food chains, level of eutrophication, seabed integrity, impact of pollutants, and marine litter, on the other hand, did not indicate a good environmental status. The researchers concluded that the overall marine environmental status is bad, signalling that the Gulf of Riga and Latvian Baltic Sea territories need significant attention.
At least EUR 20 billion per year in public and private funding at national and EU level 'should be' unlocked for spending on nature.	The European Commission estimates Latvia's investment needs for biodiversity and ecosystems at EUR 1 billion per year for 2021 to 2027:[208]

[204] City Development Department, Rīgas pilsētvides zaļināšanas plāns, *Riga City Council, s.a.*, accessed 3 November 2025.

[205] City Development Department, Iedzīvotāju asamblejā iesniedz 41 zaļināšanas rekomendāciju, *Riga City Council*, 2024.

[206] Department of External Communication, 'Tiek izstrādāts zaļās infrastruktūras projekts Rīgas vēsturiskajam centram', *Riga City Council*, 2025.

[207] Latvian Institute of Aquatic Ecology, Jūras vides stāvokļa novērtējums, *Ministry of Climate and Energy*, 2024.

[208] European Commission, Commission Staff Working Document 2025 Environmental Implementation Review Country Report - Latvia, SWD(2025)315, *European Commission*, 7 July 2025.

A 'significant proportion' of the 25 per cent of the EU budget dedicated to climate action will be invested in biodiversity.	(i) Latvia's Prioritised Action Framework (PAF) for the Natura 2000 areas: EUR 115 million per year, mostly running costs; (ii) additional costs of implementing the Biodiversity Strategy: an additional EUR 632 million per year; (iii) sustainable soil management costs: EUR 266 million per year. Latvia's level of nature financing is estimated to be EUR 119 million per year in 2021 to 2027. Only 53 per cent of this is direct financing to biodiversity and ecosystems,[209] so even this figure may be an overestimate. Latvia's investment gap is estimated to be around EUR 0.9 billion per year, or 2.3 per cent of its GDP.[210] This puts Latvia's spending at less than one eighth of its needs, compared to one fifth in Estonia, one third in Hungary and three fifths in the EU as a whole. 11.8 per cent of Latvia's total current biodiversity financing is estimated to come from EU cohesion policy, 62.6 per cent from CAP, 7.6 per cent from Horizon Europe, around 2.9 per cent from LIFE and 3.8 per cent from the European Maritime, Fisheries and Aquaculture Fund. The EU MFF altogether accounts for 89.7 per cent of the financing and the RRF for 1.5 per cent, adding up to a total of 91.2 per cent from the EU budget. The other 8.8 per cent comes from national sources.[211] Latvia has programmed only 17.9 per cent of its CAP budget in measures dedicated to support biodiversity over 2021– 2027, as well as 3.5 per cent of its cohesion policy EU contribution amount. These figures are below the EU average. Latvia was one of the few Member States that did not make use of RRF funding for direct biodiversity investments.[212]

Recommendations for Latvia

- Complete the Natura 2000 site designation process.
- Increase funding for biodiversity using national sources like taxes or user fees, as well as making more use of EU funds for nature.
- The designation of protected areas, including Natura 2000 sites, has to speed up in order not to risk losing any more nature and to reach the 2030 goals, while ensuring scientific justification for the choices made.

[209] Ibid.

[210] Ibid.

[211] Ibid.

[212] Ibid.

- An ambitious nature restoration plan has to be developed, in order to result in significant improvements of the conservation status of species and habitats.
- The state forest company should play a key role in reaching the Biodiversity Strategy and Nature Restoration Regulation objectives, by providing a safe harbour for species and sufficient space for habitats, without profit as its primary interest, as well as by leading by example.
- A shift away from outdated agricultural practices must be driven by providing more support to farmers financially, practically, and through advisory services. At the same time, obligations to lower the use of fertilisers and pesticides, minimise drainage, and diversify agricultural practices, must be made more effective, and large landowners must do their part.
- Compensation to landowners for limiting economic activity on land has to be sufficient but fair, as they take on the responsibility of ensuring biodiversity and ecosystem services to the greater population.
- Research, monitoring, and natural accounting must be untainted by the interests of the industries and must embody the highest scientific standards, ensuring alignment between relevant international research.
- Learning and understanding that there is a direct connection between the climate goals and biodiversity goals is necessary for reaching both.
- Use of EU funding for improving the state of biodiversity needs to be expanded due to the great results of past and ongoing projects, but state investments have to be increased too, demonstrating the ambition to support local nature and its contribution to people's wellbeing.
- In coordination with the European Commission, Latvia should improve and unify its methodologies for measuring progress towards goals and comparing data, as well as making information more publicly available.