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Sabima's feedback on the initiative

Protecting biodiversity: nature restoration targets under EU biodiversity strategy

The Norwegian Biodiversity Network Sabima is a Norwegian NGO working to halt the loss of biodiversity. In light of the IPBES' 2019 Global Assessment Report on Biodiversity and Ecosystem Services, and the IPCC report on Climate Change and Land, both revealing dangerous nature decline, Sabima strongly supports and applauds EU's ambition to reverse biodiversity loss and to take a lead by example and action. Sabima also supports freshwater ecosystems as a focal area of the EU Biodiversity Strategy for 2030.

European nature has been hit hard throughout the industrial revolution and the mechanisation of agriculture as well as by industrial forestry, urbanization and other polluting or land degrading activities. To set legally binding nature restoration targets to restore degraded ecosystems in the EU is therefore important and a very good starting point for reversing biodiversity loss. We support the idea to develop an EU-wide methodology for mapping and assessing ecosystems, in order to restore them, and thereby reinstate their ability to provide ecosystem services such as pollination, water regulation, soil health, climate regulation and disaster prevention.

As few states dare implement stronger environmental goals than their trading partners for fear of an un-level playing field for their industry, which probably explains why the voluntary targets as tried out in the 2011 strategy for 2020 was not successful, we fully support intervention at EU level. We believe such intervention is justified in view of the scale and transboundary nature of biodiversity-related issues, including the pressures on ecosystems.

As neither the Birds Directive nor the Habitat Directive are included in the EEA agreement, these directives are not transposed into Norwegian law. But, we wish to emphasize that the EEA agreement does include the EU Water Framework Directive, which means that the elements of the Biodiversity Strategy affecting freshwater ecosystems, free-flowing rivers, wetlands and coastal waters will apply to Norway. Thus demanding that Norway develops legally binding biodiversity restoration plans for the ecosystems covered by the EU Water Framework Directive.

Sabima agrees that greater efforts are needed to restore freshwater ecosystems and the natural functions of rivers, in order to achieve the objectives of the Water Framework Directive. It is mentioned that this can be done by removing or adjusting barriers that prevent the passage of migrating fish and improving the flow of water and sediments. The restoration of floodplains and wetlands will also be important to reach the goals of the Water Framework Directive. We also believe it would be important to link and integrate the work on restoring fresh water ecosystems and coastal waters to the development of River Basin Management Plans (RBMPs) and the work in the River Basins.

Despite Norway's profile of vast areas of wilderness and pristine nature, there are at least 250 freshwater species and six types of freshwater ecosystems that are endangered (EN), vulnerable (VU) or near threatened (NT) in Norway. In addition, the Norwegian red list of ecosystems also includes five types of shallow coastal ecosystems as EN, VU or NT. To give an example of the Norwegian government's level of ambition on restoring the ecosystems of rivers, we would like to point to the approximately 4.500 water bodies affected by hydropower in Norway. Only 700 of these are estimated to reach good ecological status, yet only 400 are scheduled for environmental measures up until 2033. The remaining 3.400 have either been given less stringent objectives (according to the Water Framework Directive art 4.5) or have been defined as already having reached their full ecological potential, with good ecological potential defined as the present condition.

The Norwegian government is however currently developing a strategy for river and watercourse restoration for the period 2021-2030. The aim of the strategy will be to contribute to fulfilling the goals of the EU Water Framework Directive in terms of restoring waterbodies whose ecological status otherwise will not meet the environmental objectives. Another aim of this national strategy is to secure that all authorities concerned contribute and do their share of the work, emphasizing cooperation and coordination as means of achieving more restoration. The national strategy will most likely have no legal status in it self, which we believe will be a weakness and we strongly believe in linking the strategy to legally cross-sectoral binding restoration targets for the ecosystems covered by the Water Framework Directive, as would be the result of the proposed Biodiversity Strategy. The Biodiversity Strategy will be an important tool in overcoming the current fragmentation between nature protection and water management.

Best regards,

Christian Steel
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