

## DANISH GREEN NGO'S FORUM

European Commission  
Commissioner Karmenu Vella

September 18th 2015

### **Fitness Check of the Nature Directives**

Dear Commissioner

On behalf of the Nature Conservation societies in Denmark, we first would like to thank you, as representative of the European Commission, for your institution's efforts towards protecting and improving our nature in Europe, especially within the framework of Natura 2000.

We are pleased to note that reports and evaluations on efforts under the Birds- and Habitats Directives show that, where management obligations are taken seriously by authorities, the efforts undertaken within the framework of the Nature Directives yield positive results.

As environmental NGOs we are very much aware of any potential and actual conflicting interests between nature protection efforts and the interests of the business community, especially in the sectors of agriculture, forestry and fisheries. As the Birds Directive dates back to 1979, and the Habitats Directive to 1992, it has obviously been a long and hard road to achieve the buy-in of various stakeholders and put the necessary measures in place to reach set management targets.

The Directives are a means of ensuring similar nature management efforts among Member States, establishing a much needed level playing field ensuring that no Member State can secure a short-term competitive advantage at the expense of its wildlife. Changing the scope of management efforts, and thereby changing the long term efforts of most Member States so far, would be to change the rules of the game in the middle of the game.

We are nevertheless acutely aware of the important challenges both Member States and individual landowners may face in living up to their management targets and obligations.

In this context we particular welcome the Commission's efforts to mitigate unintended side effects and unfair consequences on individual farmers, foresters and fishermen. We believe that the persistent lack of concrete and significant positive incentives for "housing" and managing nature is the main cause of the persistence of conflicts between nature management under Natura 2000 and the business community.

We therefore strongly recommend that the EU in particular intensifies its effort to improve the state of Europe's threatened biodiversity by meeting its commitment to eliminate incentives harmful to biodiversity, and apply positive incentives in alignment with Aichi Target 3 in the decision X/2 Strategic Plan for Biodiversity 2011-2020 under the CBD.

Conflicts between business and Natura 2000 obligations and efforts would obviously be significantly reduced, if farmers and foresters were given more positive incentives, at similar levels across all EU Member States.

In particular we recommend that the Commission improves the incentives under the CAP to secure that biodiversity becomes integrated to a much higher degree and that more incentives are given to 5-years-long grazing agreements. A system where cumulative biodiversity initiatives are progressively supported would be recommended. Also sufficient funding under LIFE for targeted biodiversity conservation measures is recommended.

On behalf of the Danish Green NGO's Forum,

Yours sincerely



Ella Maria Bisschop-Larsen  
Chair

The Danish Green NGO's Forum consists of

Danish Society for Nature Conservation  
Nature & Youth  
Danish Outdoor Council  
Ecocouncil  
Geological Society of Denmark  
Danish Mycological Society  
Danish Botanical Society  
Danish Biologist Association  
Greenpeace Denmark  
Jutland Natural History Society  
Danish Mammal Association  
Oceana Denmark  
Danish Ornithological Society  
Danish Anglers Association  
WWF Denmark  
Danish Entomological Society  
Forests of the World, Denmark