

CC(22)2147:1 – NC/rd

Mairead McGuinness
Commissioner for Financial
services, financial stability and
Capital Markets Union
Rue de la Loi 200
1049 Brussels
Belgium

Brussels, 26th April 2022

**RE: Proposal for a Regulation of the European Parliament and of the Council on
Nature Restoration**

Dear Commissioner McGuinness,

We write to you regarding the upcoming proposal for a regulation on nature restoration which shall be released by the European Commission on June 22nd 2022. It must be noted that Copa-Cogeca has consistently supported the EU's ambition of improving Europe's biodiversity, and it is for this reason that we would like to share our concerns on the future restoration target proposal:

The targets of restoration must be achievable and realistic in order to actually accomplish restoration. Under current plans, the targets would cripple local economies, reduce the amount of agricultural and forestry land substantially, and effectively limit the ability of the EU to produce in an efficient and sustainable manner. Restoration must take place but not at the risk of destroying the socio-economic fabric of the European Union.

A clear and coherent Biodiversity Funding Mechanism must be established in order to achieve restoration. Currently the plans for restoration are financially based in a variety of EU funds spread across the CAP, Horizon Europe, European Space Programme, European Solidary Corps, and many others. However, it is delineated that restoration will cost approximately 14 billion euro annually, and included in each Restoration Plan through these funds, which is an extremely cumbersome system to achieve our restoration goals. To ensure restoration, funding must be clear, concise, and coherent; achieved through a Biodiversity Funding Mechanism.

A directive would better allow for the proper long-term planning for restoration measures to be tailored to fit the Member States. Restoration is a long process, often taking up to 70 years to rehabilitate a habitat or species; thus, speed is not necessarily a virtue when it is essential that restoration plans be prepared to ensure short-, medium-, and long-term restoration according to each Member State's needs. Speed does not aid long-term planning, it inhibits it. A directive would allow restoration to be more targeted and bio-geographically refined to the needs of the EU27 and respect the Member State's rights to subsidiarity and proportionality.

The impact on property rights must be considered, respected, and mitigated. Restoration will occur predominantly on private land, and thus it is essential that all measures be voluntary and fully respect those whose land may be affected by restoration. Restoration can only be achieved with the full-backing of landowners and it is thus of the utmost importance that they be financially supported in the case of possible impacts on their livelihoods and private property.

This letter has also been sent to Executive Vice-President Timmermans; Commissioner for Agriculture, Commissioner Wojciechowski; Commissioner for Environment, Oceans, Fishers, Commissioner Sinkevičius; Commissioner for the Internal Market, Commissioner Breton; Commissioner for Health and Food Safety, Commissioner Kyriakides; and, Commissioner for Cohesion and Reforms, Commissioner Ferreira. We attach an annex which further explains our stance on these issues, and we are available for further dialogue.

Yours sincerely,

Copa



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