

CAB-VON DER LEYEN)**Subject:**

FW: WWF - Follow up

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Sent: Friday, April 16, 2021 9:46 AM
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Dear [REDACTED]

[REDACTED] for the open discussion yesterday.

You will find below additional details on some of the key content points [REDACTED] and I raised yesterday, including links to recent reports and briefings.

I hope this is helpful, we look forward to continuing the dialogue on these files in the coming weeks and months.

Have a nice day,
[REDACTED]

Taxonomy

- Given the high-profile nature of the taxonomy, a greenwashed DA would deal a huge blow to the credibility of the European Commission and Green Deal. **We believe three sectors are the worst in the leaked proposals; fossil gas, forestry and bioenergy. Where possible, we would call for their removal from the proposal to give more time and consideration.**
- We are especially worried about the forestry criteria and wrote a [letter on 9 April with our assessment](#), alongside a large list of other signatories. In case forestry criteria are kept in, we are calling to for significant changes in comparison to the leaked proposals. **The 25ha loophole would cover 2/3 of forest owners as green without doing anything in addition, and must thus be decreased. The additionality criteria should be maintained and the climate benefit analysis should happen over a 20 year timeline instead of 30** (as the latter puts us beyond 2050). We are happy to provide further input if necessary.

Nature restoration

- **We're very welcoming of President von der Leyen's clear commitment to an ambitious biodiversity agenda.** We in particular appreciated the speech she gave at the Davos Agenda Week). We note the (low) enthusiasm from Member States on the importance of nature and take this up as a priority with our network.

- For second half of this year, on the nature restoration law, we'd like to share our current trust in the Commission getting the proposal right in terms of 'quality' (restoration of 'high-quality nature') but we're concerned about the 'quantity'. We believe 15% of land and sea should be restored by 2030, but the current thinking from the Commission risks being limited to *at least 15% of degraded area to a good condition by 2030 for habitats under the Habitats Directive Annex I*. We're still assessing but a back of the envelop calculation puts this at not even 1% of the EU land area! We're in touch with the services over this, hoping to see improvements.
- As WWF we have a specific focus on rivers as these ecosystems are in by far the worst state, more so than marine or forest ecosystems even. **We believe a free flowing river restoration target in the restoration law is crucially needed;** and can complement the Water Framework Directive. The current target in the Biodiversity Strategy to have at least 25,000 km of free-flowing rivers seems low according to latest data. We will launch a report next week that shows that removing only 732 barriers in the EU would already allow to achieve nearly half of the target set, and that removing 7000+ barriers would allow to double the EU target by reconnecting nearly 50,000 kilometers of rivers in the EU.

Deforestation

- You may have noticed our report published yesterday on the [continuing impact of EU consumption on nature](#), it received strong coverage in Belgian and international media. **The EU is the second biggest importer of deforestation after China. In 2017, the EU was responsible for 16% of deforestation associated with international trade, totalling 203,000 hectares and 116 million tonnes of CO2.** The EU was surpassed by China (24%) but outranked India (9%), the United States (7%) and Japan (5%).
- We are looking forward to the deforestation law proposals by the Commission. In particular, we'd like to raise that the EU **demand for commodities is also driving destruction in non-forest ecosystems, such as grasslands or wetlands.** Our report establishes clear links between EU consumption, particularly of soy and beef, and the conversion of grassland landscapes, such as the “deforestation hotspots” of the Cerrado in Brazil and the Chaco in Argentina and Paraguay. Based on these findings, we believe it is **critical for the upcoming law to also include in its scope the conversion and degradation of natural ecosystems alongside deforestation and degradation of national forests.** [Our seven other flagship recommendations are available here.](#)

Climate law and Fit for 55

- We understand that the 2030 target is now the main outstanding point in the trilogue negotiations. You are aware of our concerns regarding the 'net' 55% target. **The new language from the Council to ensure a cap or discount on the contribution of sinks remains insufficient.** We understand that the Parliament position and our WWF position of at least 65% are difficult at this point in the political negotiations. We however **believe that the 2030 climate target should remain a target for emissions reduction only, with a separate target for removals.**
- Biomass/bioenergy is indeed a significant battleground ahead, where WWF strictly [follows the science](#), meaning for the EU to [fundamentally change the incentives for the burning of forest biomass and crops for energy](#).

'Wellbeing economy'/beyond GDP and better regulation

- We welcome the positive language from President von der Leyen on considering more than just GDP as a means of progress, and look at wellbeing, esp. in light of the lessons learnt from the Covid-19 crisis. We are continuing our exchanges with IDEA, and are calling on the Commission and all EU institutions to **see how in 2022 we can make the most from Stockholm +50, as well as an honest debate and assessment of the various progress frameworks that are now scattered at EU level (semester, social platform, 8EAP...) which all overlap in some ways but all seem to be trumped by narrow economic indicators when it comes to the high-level decision making.**
- We are looking forward to the upcoming communication on better regulation. We believe it must go beyond the role of the Parliament and the Council (as this seems to shift the onus towards them), and while it's positive to hear that public consultations will be addressed, we count on the Commission to show how it can contribute more to evidence based policy (the example of the 2030 climate target consultation that was limited up to 55% was unfortunate in that respect, given that science calls for 65% at least).
- For the communication on better regulation, we **look forward on learning how the Commission will guarantee that all its initiatives contribute to its sustainability goals; expanding the number of impact assessment tools to truly consider the environmental impacts; the immediate publication of impact assessments, in line with the ECJ ruling, and of course the signals needed to make the 'green oath' a reality.**

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