

# Wetlands International Europe's position concerning the proposal for a Regulation of the European Parliament and of the Council on nature restoration

“Bringing nature back in our lives” is the main goal enshrined in the 2030 Biodiversity Strategy. The proposed EU Regulation on Nature Restoration is a crucial piece of legislation to achieve this goal.

Wetlands International Europe welcomes the proposal of the European Commission and calls on the European Parliament and Council to adopt an even more ambitious regulation and put the EU at the forefront of resolving the interlinked global crises of climate change and biodiversity loss. Wetland habitats, such as rivers, lakes, marshes, peatlands and coastal habitats, play a crucial role in reversing the loss of biodiversity.

To strengthen the EC proposal in these areas, we recommend the following:

**Article 1. Level of ambitions.** We support the ambition outlined in Art. 1(2) of the proposal to put in place area-based restoration measures that shall cover at least 20% of the EU's land and sea areas by 2030 and all ecosystems in need of restoration by 2050.

However, we find it important that the 20% target applies separately to ***both the land and sea areas*** to ensure that restoration measures are implemented in a balanced manner both for terrestrial and marine ecosystems.

**Articles 4 and 5. Restoring habitats protected under the Nature Directives.** We welcome the provisions of Art. 4(1) and 5(1) to restore 30%, 60%, and 90% of habitats listed in Annex 1 of the draft regulation and the Habitats Directive, as well as marine habitats listed in Annex 2 of the draft regulation that are not in good condition by 2030, 2040 and 2050 respectively. We also welcome the provisions of Art. 4(2) and 5(2) to recreate these habitats on 30%, 60% and 90% of the area necessary to reach the favourable reference area and to restore habitats for species listed in the Annexes II, IV, and V of the Habitats Directive and or bird species covered by the Birds Directive.

However, we are concerned that the majority of the proposed restoration measures are earmarked for after 2030, which does not reflect the urgency of the climate and biodiversity crises and exposes the restoration measures to shifting political priorities. In our view, ***at least 80% of the restoration measures should take place before 2040.***

Although, we strongly welcome the fact that Articles 4(7) and 5(7) requires Member States to ensure that areas where habitats listed in Annexes I and II occur do not deteriorate, we believe the non-deterioration provisions should be strengthened and extended. Therefore,

we propose that the regulation requires Member States *to use legal, administrative or contractual arrangements to secure the non-deterioration of these habitats*. Furthermore, the *non-deterioration obligations should be extended to urban green space (Article 6), free-flowing rivers (Article 7) and the restoration of drained peatlands (Article 9(4))*, otherwise the ecological benefits from the restoration of these areas can be lost.

Furthermore, we are concerned that there is no obligation to restore “sea to source” connectivity for the swimways of diadromous fish or to coordinate habitat-restoration along the flyways of migratory birds. *Provisions for such coordination should be included in Articles 11–15.*

We are also concerned that the term “unavoidable habitat transformations which are directly caused by climate change” mentioned in Articles 4(8)(b), 4(9)(b), 5(8)(b) and 5(9)(b) is not defined in Article 3. As the impact of climate change on wetlands is often exacerbated by unsustainable water resources management, and the same applies to many other ecosystems, it is important to *provide a definition of what is unavoidable and what is directly caused by climate change.*

**Article 6. Restoration of urban ecosystems.** This article focuses on increasing the urban green space by 3% by 2040 and 5% by 2050.

However, Art. 3(13) defines “urban green space” as “all green urban areas; broad-leaved forests; coniferous forests; mixed forests; natural grasslands; moors and heathlands; transitional woodland-shrubs and sparsely vegetated areas”. This definition does not include urban wetlands such as creeks, rivers, ponds and marshes. We note that the 13<sup>th</sup> Conference of the Parties to the Ramsar Convention on Wetlands in 2018 recognised the importance of urban and peri-urban wetlands that provide benefits even beyond the city limits. These wetlands often play important ecological roles such as recreation, act as flood buffers, have a cooling effect and act as stepping-stones or migration corridors for wildlife. Therefore, we propose changing the name to “urban green **and blue** space” and also include **wetlands in the definition in Article 3(13).**

**Article 7. Free-flowing rivers.** We welcome the requirements to inventory barriers and propose removals to improve the longitudinal and lateral connectivity of our rivers, and the inclusion of a commitment to restore 25,000 km of rivers to free-flowing status by 2030.

However, we notice with regret that the free-flowing rivers target is *neither legally binding nor timebound* as formulated in Articles 7 and 14.

We also maintain that if the level of ambition for free-flowing rivers (25,000 km affecting only 2% of all rivers in the EU) is to deliver meaningful ecological impact, especially for diadromous fish species such as European Eel, and to mitigate sea level rise and coastal erosion through sediment replenishment, it requires “sea to source” longitudinal connectivity. We call for

**increasing the target to 15% of all rivers in the EU (i.e., 178,000 km)** and defining a target for 2050.

The proposal in its current form addresses primarily obsolete barriers, which reduces the scope of the provision and **should therefore be deleted**. Instead, the **prioritisation of barriers should be made at the national or river basin level via a case-by-case assessment**, taking into consideration the specific purpose of the barrier and the ecological benefits of removal, as well as the need to ensure connectivity between marine and freshwater ecosystems.

References to the possibility of **using exemptions under the Water Framework Directive (WFD) and the Trans-European Transport Network (TEN-T) Regulation should be deleted** to avoid the abusive use of derogations. Instead, the text should only recall the main purpose of the WFD, which is to bring the vast majority of EU water bodies to good status by 2027.

**Article 9(4). Restoration of drained peatlands under agricultural use.** This provision reflects the recognition of the vital role of peatlands in climate change mitigation and adaptation, biodiversity conservation and disaster risk reduction as expressed in the EU Biodiversity Strategy.

However, the ambition to restore 70% of drained peatlands under agricultural use and rewet only 50% of these by 2050 underutilises the climate change mitigation and biodiversity protection potential of peatland restoration and is not in line with the Paris Agreement that requires the **protection of all remaining intact peatlands and the rapid restoration of almost all drained peatlands**<sup>1</sup>. Globally the EU is the second largest emitter of greenhouse gases (GHG) from drained peatlands (220 Mt CO<sub>2</sub>eq/year = 15% of total global peatland emissions<sup>2</sup>). This is equivalent to nearly 5% of the official EU GHG emissions. Drained peatlands on agricultural soil in the EU amounts to 52,000 km<sup>2</sup>, and about twice as much drained peatland is under land use other than agriculture, mainly covered by forest.

**We recommend expanding the scope of restoration for drained peatlands from agricultural areas to all land use** except for settlements. This would maximise the climate change mitigation, adaptation and biodiversity conservation benefits. Consequently, Article 9(4) should concern all organic soil on drained peatlands regardless of whether it is under agricultural or other use.

The restoration targets of 30%, 50% and 70% by 2030, 2040, 2050, respectively, **should be significantly increased** to align these targets with the requirements of the Paris Agreement

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<sup>1</sup>

[https://www.researchgate.net/publication/359773707\\_Ramsar\\_Policy\\_Brief\\_5\\_Restoring\\_drained\\_peatlands\\_-\\_A\\_necessary\\_step\\_to\\_achieve\\_global\\_climate\\_goals](https://www.researchgate.net/publication/359773707_Ramsar_Policy_Brief_5_Restoring_drained_peatlands_-_A_necessary_step_to_achieve_global_climate_goals)

<sup>2</sup> [3] Joosten (2009) The Global Peatland CO<sub>2</sub> Picture

<https://unfccc.int/sites/default/files/draftpeatlandco2report.pdf>

and the intentions expressed in the EU Biodiversity Strategy which prioritises those habitats with the greatest potential to capture and store carbon<sup>3</sup>.

The restoration of peatlands for climate change mitigation purposes always requires rewetting even if it is used for paludiculture<sup>4</sup>. Therefore, the **provisions for lower rewetting targets should be removed from Article 9(4)(a)– (c)**. The list of appropriate restoration measures for drained peatlands should include only points (1) and (4) from Annex VII.

**Articles 11-15. National nature restoration plans.** We welcome the mechanism and the content proposed for the national nature restoration plans. This will guide the restoration process in the long-term and will serve as a mechanism to monitor implementation.

However, we note that the preparation of the national nature restoration plans follows a target-by-target approach, but a more integrated, **landscape-scale restoration** approach is needed. This would maximise synergies between the various restoration measures at the landscape-scale to realise the benefits recognised also by the Commission in its Explanatory Memorandum under subsidiarity: “*Restoring one ecosystem helps other neighbouring or connected ecosystems and their biodiversity...*”. We recommend reflecting this notion in Article 11.

It is also important that Article 11(4) includes the obligation to **map drained peatland areas**<sup>5</sup> because this would be a precondition to implement Article 9(4) and is currently not addressed.

To enable the **full and effective participation of the public** in the preparation of National Restoration Plans, Member States should ensure that the public is adequately informed of the outcomes of the different preparatory mapping and identification processes undertaken under Article 11. Article 11(11) also needs to be expanded, including by setting adequate consultation timelines and effectively informing the most relevant public stakeholders, to ensure compliance with Article 7 of the Aarhus Convention.

**The timeline for the finalisation of National Restoration Plans should be shortened to two years overall**, so that more time remains for the proper implementation of the plans to meet the 2030 targets. According to the Commission’s forecast, under the current conditions the adoption of National Restoration Plans is only expected in 2027, leaving only three years to deliver on the 2030 targets.

National Restoration Plans should (under Article 12(2)(b)) include an explanation on how the restoration measures adopted are **additional to those that Member States are already legally required to adopt under the existing environmental acquis** (particularly the Birds, Habitats and Water Framework Directives). To ensure the additionality of restoration

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<sup>3</sup> Page 6 of the [EU Biodiversity Strategy for 2030](#)

<sup>4</sup> If the purpose is conservation of a species protected by the Habitats or the Birds Directive, the restoration should be governed by the provisions of Article 4 and not Article 9(4).

<sup>5</sup> National authorities can use the data already available and will be further improved thanks to on-going Horizon projects.

measures, Member States should therefore be required to take their pre-existing obligations into account under Article 11(7).

**Article 17. Monitoring.** We welcome the inclusion of a detailed monitoring framework set out by the regulation.

However, we note that the *monitoring requirements of the free-flowing rivers and restoration of drained peatlands are missing*. Therefore, Article 17 should include provisions for monitoring the length of rivers and the extent of associated floodplain areas restored under Articles 7(2) and (3) and the extent of areas restored under Article 9(4) to provide an audit trail for reporting on this under Article 18(c).

**Article 18. Reporting.** We welcome setting out clear reporting obligations.

However, we note that reporting on the restoration of free-flowing rivers is missing and Article 18 should require reporting on the length of rivers restored to free-flowing status and on the extent of associated floodplains.

**Funding.** In its current format, the proposed regulation does not explicitly address the EU support for nature restoration other than in Article 12(2)(l).

To ensure the seamless and effective implementation of the regulation, the legislative proposal should include an obligation for the *Commission to assess the sufficiency and use of existing EU funding* available for nature restoration and *explore options to expand these*, for example through the establishment of dedicated funding for nature restoration, pursuant to the mid-term review of the Multiannual Financial Framework.

# Higher ambition for Peatlands in the EU Nature Restoration Law Proposal

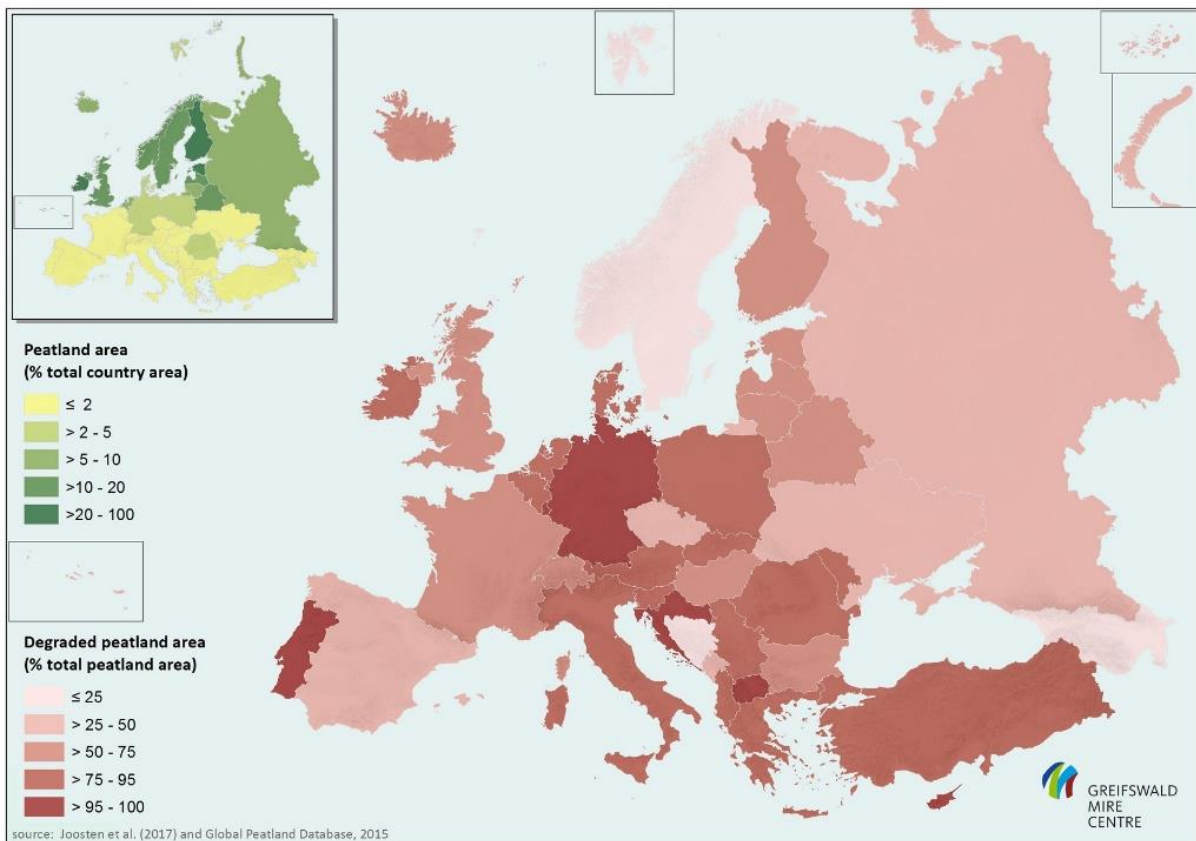
Policy Briefing (August 2022)

The long-awaited proposal for a regulation on nature restoration that explicitly targets the restoration of Europe's ecosystems was presented by the European Commission on 22 June 2022. Next, the EU co-legislators, the European Parliament and Council, will develop and further discuss their positions, which will be negotiated in trilogue meetings.

This is a year of important international moments for nature and climate, with the UNFCCC COP27, Convention on Biological Diversity (CBD) COP15 and Ramsar COP14 all taking place in 2022. The EU and its Member States can play a leading role in the international arena by showing the right example at home. The Regulation on nature restoration, also called Nature Restoration Law, can be a game-changer, triggering transformation on a large scale, constituting important steps to mitigating climate change, helping EU citizens to adapt to a warmer and more unstable climate, contributing to improved functioning of ecosystems, slowing down and stopping the catastrophic decline in biodiversity, and stimulating sustainable and resilient economies.

We, conservationists and scientists caring for wetlands and peatlands across the EU call on all stakeholders involved to take action to restore peatlands. We welcome the proposal and, in particular, appreciate the target to restore drained peatlands under agricultural use beyond peatlands listed in Annex I of the Habitat Directive 92/43/EEC (Art. 9 NRL proposal, see end of this paper). We welcome the recognition of the importance of peatlands for biodiversity and climate protection (recital 54, NRL proposal) and the mention of alternative modes of use such as paludiculture (recital 55, NRL proposal). We call on decision-makers to improve the proposed targets as a transformation pathway for peatlands should lead to net zero CO<sub>2</sub> emissions by 2050.

## 1. The state of peatlands in Europe



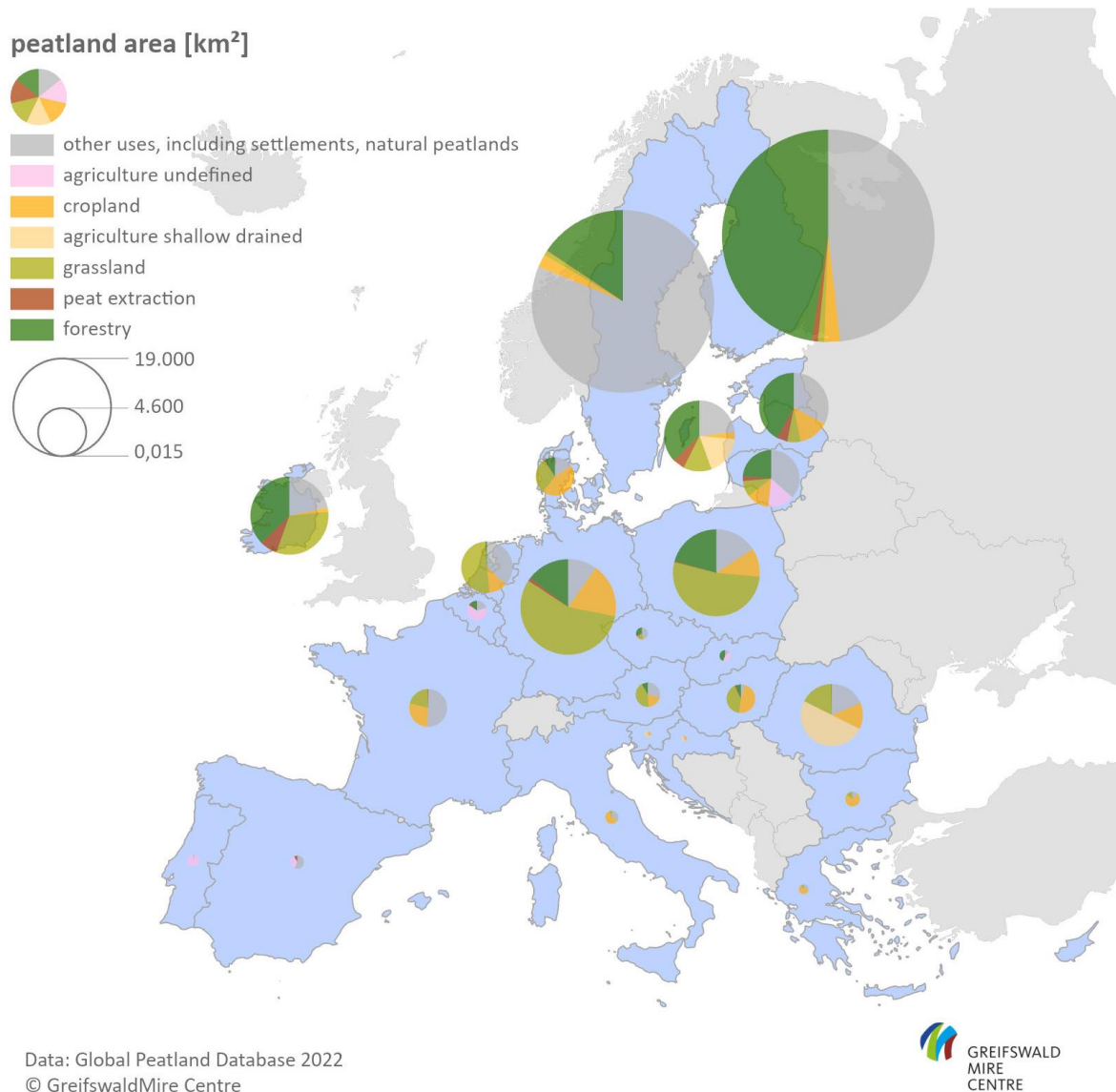
**Figure 1: Map of current peatland area in Europe (upper left corner) and percentage of degraded peatlands from that total area (main map) (own compilation)**

Peatlands<sup>6</sup> occur in almost all EU Member States (see figure 1), with a concentration in north-western, Nordic and eastern European countries, covering an area of circa 350,000 km<sup>2</sup>, of which more than 50% are degraded by the effects of drainage<sup>7</sup> and used for agriculture, forestry and peat extraction.

There are significant differences in the extent and use of peatlands within Europe (see figure 2). While peatland areas are rather small in the Mediterranean region, the size of peatland area increases significantly towards the north. In the peatland-rich, central European countries of Poland, Germany and the Netherlands, the majority of peatland area is used for agriculture. In Northern Europe, namely in Finland and in the Baltic countries Estonia and Latvia, the use is predominantly forestry.

<sup>6</sup> Peatlands are areas with a naturally accumulated peat layer at the surface (peat = sedentarily accumulated material from dead organic material), organic soil contains at least 20 % organic carbon (35 % organic matter) as defined by Intergovernmental Panel for Climate Change used in reporting greenhouse gas inventory (IPCC 2006, 2013)

<sup>7</sup> Joosten, H., Tanneberger, F. & Moen, A. (eds.) (2017) Mires and Peatlands of Europe: Status, Distribution and Conservation. Schweizerbart Science Publishers, Stuttgart.



**Figure 2: Map of peatland use in Europe, showing proportions of different land use categories per country (own compilation)**

The EU is the second largest global emitter of greenhouse gases (GHG) from drained peatlands (230 Mt CO<sub>2</sub>eq/year = 15% of total global peatland emissions), which equates to approximately 6.5% of EU-27 total greenhouse gas emissions (3,601 Mt CO<sub>2</sub>eq/year in 2019)<sup>8</sup>. Restoring drained peatlands by rewetting (raising water levels near to the surface, e.g. by drain blocking or stopping pumping in polders) would allow the EU to reduce these emissions significantly and protect the remaining peat carbon stocks. Afforestation of drained peatlands is generally an inappropriate climate change mitigation measure as gains from increased biomass carbon sequestration may be annihilated by increased peat carbon losses and due to changing albedos<sup>9</sup>.

<sup>8</sup> Global Peatland Database 2022, European Environment Agency (2021): EEA greenhouse gases - data viewer.

<sup>9</sup> Lohila, A. et al (2010): Forestation of boreal peatlands: Impacts of changing albedo and greenhouse gas fluxes on radiative forcing. *Journal of Geophysical research*.

Ojanen, P. & Minkinen, K. (2020): Rewetting offers rapid climate benefits for tropical and agricultural peatlands but not for forestry-drained peatlands. *Global Biogeochemical Cycles*.



## 2. The effect of the peatland targets for Member States

In line with what is described in the impact assessment part no5<sup>10</sup> accompanying the EC proposal, the Netherlands and Finland proportionally will be the most affected on their agricultural areas, as organic soils constitute more than 10% of their land use, followed by Germany, Ireland, Latvia and Estonia. In terms of absolute surface area, Germany and Poland are the Member States with the largest areas of agriculturally used organic soils, followed by Ireland, the Netherlands and Finland. When observing the expected total area of peatland to be rewetted in Europe, Germany, Poland and Romania will have the largest contributions, by restoring about half of their total peatland area until 2050, while the Nordic and Baltic states such as Finland and Sweden will only have to take action on 2% of their total peatland area, followed by Latvia, which will have to commit to restoration on circa 15% of its total peatland area (see figure 3).

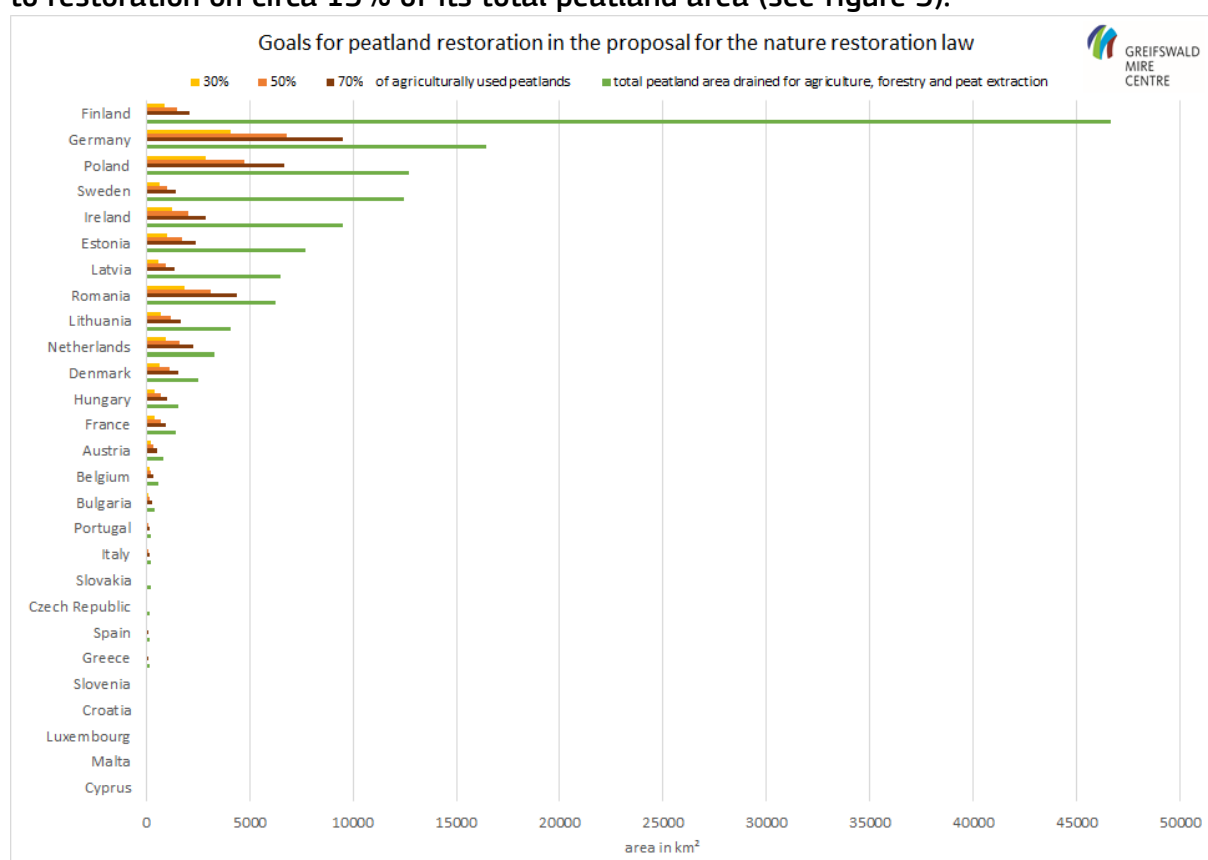


Figure 3: Area of organic soil in agricultural use constituting drained peatlands, to be rewetted to fulfil the targets mentioned in Article 9 NRL proposal (own compilation)

The targets of the NRL proposal focus strongly on agriculturally used peatlands, while many peatland-rich EU Member States use peatland areas predominantly for other land use types than agriculture (namely forestry or inappropriate restoration after peat exploitation). These other land use types are hardly covered by the proposal, which leaves the Nordic and Baltic countries with fewer obligations to restore peatlands compared to other Member States, despite their large share of drained peatland areas.

<sup>10</sup> COMMISSION STAFF WORKING DOCUMENT IMPACT ASSESSMENT REPORT ANNEX VI-b Accompanying the proposal for a Regulation of the European Parliament and of the Council on nature restoration {COM(2022) 304 final} - {SEC(2022) 256 final} - {SWD(2022) 168 final}

As it stands, Article 9.4 creates an imbalance in the NRL’s ambitions in light of the need for peatland restoration in all but the especially peatland-rich Member States.

The proposed Article 9.4 differentiates between restoration and rewetting. Restoration should not mean, however, the continuation of degraded or degrading of peatlands. The overarching objective of the law is “to contribute to the continuous, long-term and sustained recovery of biodiverse and resilient nature [...] and to contribute to achieving Union climate mitigation and climate adaptation objectives and meet its international commitments” (see general objectives of the proposed regulation). Climate objectives – clearly – cannot be reached without full rewetting. By raising the water level only partially, GHG emissions can indeed be partly reduced and biodiversity can be temporarily enhanced and maintained, but peat degradation and GHG emissions will continue. In order to stop peat decomposition, soil subsidence and CO<sub>2</sub> emissions from peatlands, peatland restoration always requires full rewetting. Only this way can peatland degradation be stopped and the remaining peat carbon stock be saved.

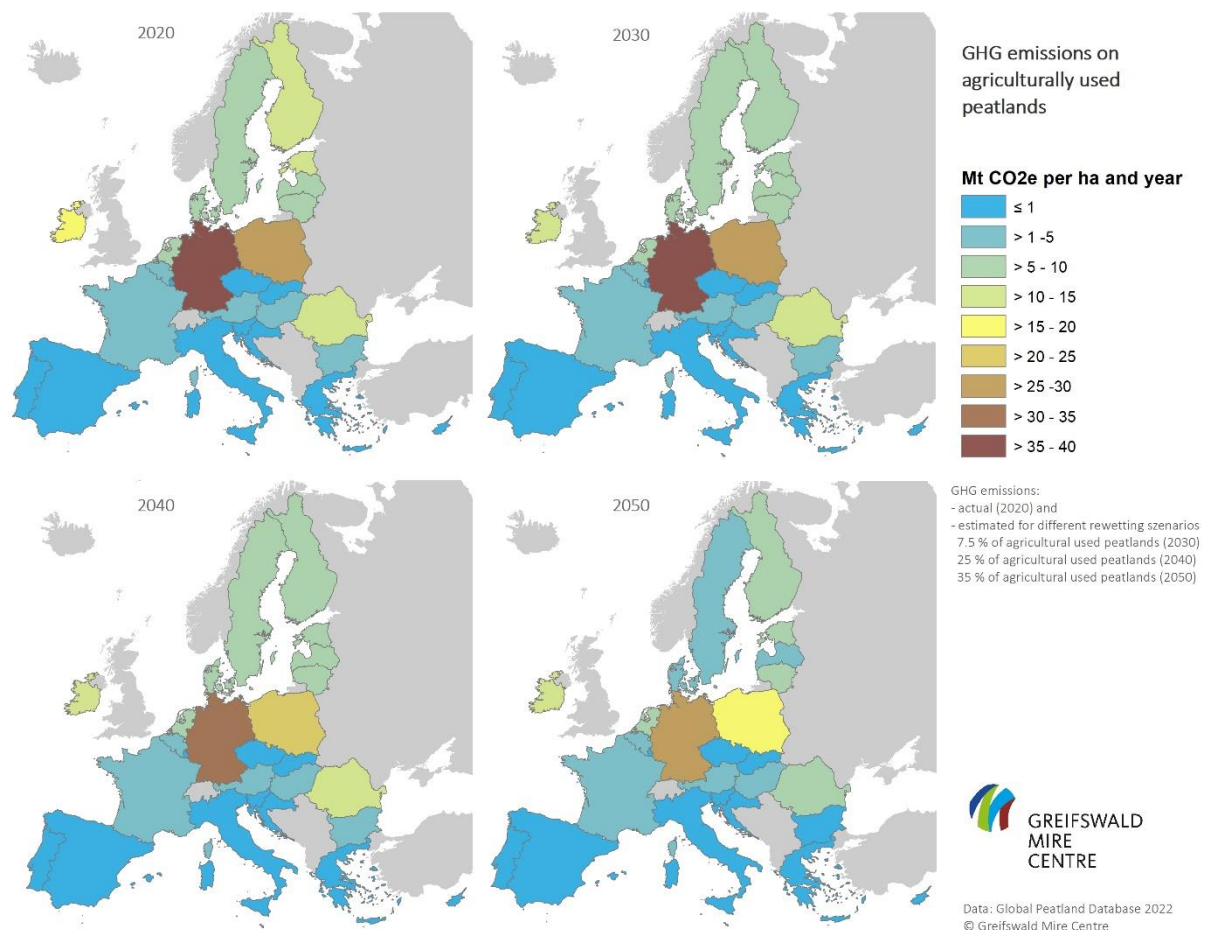


Figure 4: GHG emissions on peatlands used for agriculture, according to proposed targets for rewetting in the NRL proposal (own compilation).

Figure 4 shows the GHG emissions reduction that can be achieved when the proposed targets for peatland rewetting are fulfilled, which represents only a fraction of the proposed restoration targets (7.5 % till 2030, 25% till 2040, 35% till 2050). In 2050, Germany would still release high GHG emissions from drained peatlands (25–30 CO<sub>2</sub>-eq per ha and year, 30–35 Mt in total per year), the highest quantity in the EU-27, followed

by Poland and Ireland. This way the globally agreed target of net-zero CO<sub>2</sub> emissions by 2050 will be missed.

Besides GHG emission reductions, rewetting will prevent soil subsidence and eventual flooding and saltwater intrusion in coastal areas. It will lower the risk of peat fires, soil erosion, and desertification. It will also reduce nutrient runoff into surface waters. If needed, wet peatlands can be sustained in a productive state (paludiculture), which will continue value creation for livelihoods, offer new opportunities for economic development and at the same time reduce pressure on other wetlands.

Although the number of species found in a peatland may, in certain cases, be comparatively low, peatlands have a high proportion of specialised, characteristic species that are rare and threatened on the European or even global level. As a result of habitat isolation and heterogeneity, peatlands play a special role in maintaining biodiversity at the genetic level.

Peatlands also support biodiversity far beyond their borders by regulating the hydrology and meso-climate on a landscape-scale, especially in times of a rapidly changing climate. If restored and functioning, they could provide refuges for endangered species with an originally much wider distribution (e.g. Aquatic Warbler) and cool shelters for species displaced by climate change. On the other hand, we need more restored areas on mineral soils in a living landscape to provide habitat for species which presently make use of surrogate habitats on drained and degraded peatland sites, e.g. meadow birds.

### 3. Recommendations

Considering that EU Member States, above all peatland-rich ones, need to take clear responsibility and commitment to restore, and safeguard peatlands and that EU Member States, landowners, and land-users in the EU should be encouraged and incentivised to maintain and re-establish high water levels in peatlands to maximise carbon storage, minimise GHG emissions, and support biodiversity, we call on EU decision-makers to ensure that:

#### A) Restoration of peatlands always includes rewetting

Article 9.4 proposes separate targets for restoration and rewetting of peatlands, but this distinction is inaccurate. Rewetting is both a process of restoration and an end situation whereby we reverse drainage and make the peatlands wet again. Restoring degraded peatland requires improved hydrological conditions, which is first and foremost rewetting. Effectively, according to the current targets only 7.5% (by 2030), 25% (by 2040), and 35% (by 2050) of drained peatlands used for agriculture would be restored by rewetting. In practice, it will even be less, because rewetting of peatlands drained for forestry and peat extraction counts towards the agricultural target. Because rewetting of the latter lands is easier to realise (less opportunity costs) and contributes less to reducing emissions, it will function as a loophole to avoid the rewetting of high emitting agricultural peatlands. The current target numbers are therefore far below what can and must be achieved for the overarching climate commitments (see Recommendation B). We recommend deleting the

separate rewetting target, and to make rewetting a condition for any restoration target.

B) The proposed targets are insufficient and should be increased significantly

Although reaching the proposed targets (if referring to full rewetting as described above) already means huge transformational challenges for the use of peatland areas, they do not comply with the Paris Agreement. A complete cessation of peatland drainage and reversal of the effects of existing drainage are unavoidable to reach the core goal of the Paris Agreement - zero net CO<sub>2</sub> emissions by 2050. The EU Member States have even sharpened this goal by aiming to be climate-neutral with net-zero emissions (i.e. including all GHGs) by 2050. A higher ambition for drained peatland targets is therefore needed for consistency across policies.

C) The scope of the target is expanded to all non-residential land uses on drained peatlands

The focus on drained peatland sites under agricultural use prioritises the GHG emission hotspots but largely neglects other use types such as drained peatlands used for forestry, which urgently need to be rewetted as well. Several peatland-rich Member States (especially Nordic countries) have only a small share of agriculturally used peatlands. The proposed targets imply disproportionately low rewetting ambitions from those countries. Therefore, the scope of article 9.4 needs to be changed. The targets need to be formulated for *“organic soils constituting drained peatlands under any land use”*.

All countries should be equally ambitious in rewetting of peatlands, regardless of the type of use. Therefore, the scope of the article should be expanded to all types of peatland use. The current two subparagraphs referring to counting other land uses under the agricultural target must be deleted, also to prevent these being used as a loophole for reducing agricultural land emissions. This will also contribute to the simplicity and clarity of the regulation (see example below).

D) A mandatory monitoring for peatlands restoration is set in Article 17

Art. 17 requires Member States to monitor almost all ecosystem types except peatland restoration on drained organic soil and this omission should be rectified. Good understanding of ecosystem functioning, particularly eco-hydrological processes, as well as knowledge-based designs, are crucial for effective restoration action. Equally important is maintaining and improving the capacity for long-term monitoring of restoration impact, to allow a reliable evaluation of climate and biodiversity policy and action. Member States should be held accountable for their use of peatlands, so mandatory monitoring of peatland restoration is essential for the proper implementation and enforcement of the law. EU-funded research projects

such as [WaterLANDS](#), [ALFAWetlands](#), [WETHorizons](#), Rewet and PRINCESS are building the science base to which Member States can contribute further.

## Recommendations to improve the European Commission's current proposals on peatlands

### Proposal by EC

#### Art. 9.4

For organic soils in agricultural use constituting drained peatlands, Member States shall put in place restoration measures. Those measures shall be in place on at least:

- (a) 30 % of such areas by 2030, of which at least a quarter shall be rewetted;
- (b) 50 % of such areas by 2040, of which at least half shall be rewetted;
- (c) 70 % of such areas by 2050, of which at least half shall be rewetted.

Member States may put in place restoration measures, including rewetting, **in areas of peat extraction sites** and count those areas as contributing to achieving the respective targets referred to in the first subparagraph, points (a), (b) and (c).

In addition, Member States may put in place restoration measures to rewet organic soils that constitute **drained peatlands under land uses other than agricultural use and peat extraction** and count those rewetted areas as contributing, up to a maximum of 20%, to the achievement of the targets referred to in the first subparagraph, points (a), (b) and (c).

### Recommendation

#### Art. 9.4

For organic soils under any land use constituting **drained peatlands**, Member States shall put in place rewetting (and possibly additional restoration) measures and monitor their success. Those measures shall be in place on at least:

- (a) 30 % of such areas by 2030
- (b) 50 % of such areas by 2040
- (c) 70 %, where possible up to 100 %, of such areas by 2050.

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