



NL2120

RAPPORT



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EU Policies as opportunities for upscaling Nature-based Solutions

May 2026

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Authors

Claire McCamphill (Wetland International Europe)

Antoinette Sprenger (IUCN NL)

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NL2120 Programme

This report is drafted in the context of the programme NL2120, which is financed by the ‘Nationaal Groeifonds’. NL2120 is a ten-year programme (starting in 2024) in which science, business, government, nature organisations and education work together to make the Netherlands climate-proof and natural by upscaling Nature-based Solutions (‘NbS’). NbS can be our most important ally in climate change and other major societal challenges. They connect to the natural functioning of water, soil and ecosystems, improve biodiversity and water and soil quality, and sequester nitrogen and CO₂.

NL2120 is divided into several workstreams. This report is made in the context of workstream 3. This workstream focuses on strengthening institutional knowledge to structurally embed NbS in policy, implementation, and visions for the future. Workstream 3 works on deepening previously gained insights and developing concrete perspectives for action for upscaling NbS in implementation projects, policy programs, and future plans. With respect to policy programs, the emphasis lies on influencing policy and legislation, both nationally and at the European level. Within this workstream efforts are being made to identify opportunities for NbS within existing Dutch and EU frameworks, optimize cooperation between Dutch programs, and embed NbS in Dutch policy lines and regulations. Attention is also paid to raising awareness and support through scaling deep.

This report contributes specifically to the action ‘perspective through practice-oriented collaboration’. It sets out the most important existing EU water and land policies that legally require a plan to be developed or updated in the Netherlands in the next 3 years and identifies for each of these opportunities where NbS can be deployed to solve certain issues (e.g. address flood risks) in the Dutch context. As these policies also need to be developed or updated in other EU member states (‘EU MS’), we can use this knowledge to optimise our export strategy as regards the use of NbS. The report also identifies key upcoming EU policy developments to influence as regards NbS as these policy developments will in turn influence Dutch policy developments. Lastly, it includes NbS case studies from other European countries which can further serve as inspiration for further expansion of NbS in the Netherlands and abroad.

The report aims to address 4 questions:

1. What EU policies support the inclusion of NbS in spatial planning? And what are the specific provisions?
2. Which EU policies are currently in development that may further impact NbS Implementation?
3. What opportunities exist in the next three years to upscale NbS using the



development of national-level plans and strategies required to implement the identified EU policies?

4. What are examples of best practices of policy transposition from other EU member states in integrating NbS into spatial planning that could be applied in the Netherlands?

The answers to these questions will enable NL2120 to make informed choices on where to prioritize its efforts and inform policy makers and decision-makers in the Netherlands on which EU policy initiatives are most likely to generate real opportunities for NbS, in the coming years.

This report will provide relevant information to stakeholders active in diverse sectors and disciplines, working in both natural and human-modified ecosystems including but not limited to the Dutch government, city and local governments, planners, businesses, knowledge institutions, financial institutions and NGOs. In this report we refer to this diverse group of stakeholders as **NbS actors**. With the information provided the NbS actors can take advantage of the information provided to implement NbS in the various policy areas.

Methodology

Expert judgement: The report was developed based on expert judgement of the most relevant EU policies on water and land management. The expert involved in this report has 11 years' experience working in the EU Commission on assessing the implementation of the Water Framework and Floods Directive in EU countries, negotiations with EU MS on the Common Agriculture Policy and biodiversity policy and the development of research policy on water and climate.

Evaluation of policies: Implementation reports from the European Commission on the Netherlands progress on existing plans were assessed¹ to identify weaknesses in implementation of legal requirements. Weaknesses were defined and the issues highlighted to be addressed by the EU as part of the formal assessment for the directives. Ultimately if these weaknesses are significant and remain unaddressed over time the European Commission can progress legal infringement proceedings. As an entry point for NbS, it is logical to propose NbS that address these weaknesses and for which Dutch government actors are obligated under EU law to develop solutions.

Case study analysis: Case studies were then searched to identify how other European countries are addressing the main challenges the Netherlands is legally obliged to address in the coming years. Many EU level NbS case study databases were used to identify potential

¹ Including: https://environment.ec.europa.eu/topics/water/water-framework-directive/implementation-reports_en, [Commission Assessment of the Final Updated National Energy and Climate Plan of Netherlands - European Commission](#), [The State of Nature in the EU - Conservation status and trends of species and habitats protected by the EU Nature Directives 2013–2018](#)



case studies (e.g. <https://oppla.eu/>, <https://interlace-project.eu/index.html>, <https://networknature.eu>). Those case studies which have a more legal or financial nature (i.e. not project level) were the ones selected as they are considered to offer a more transformative impact for upscaling NbS.

Scope: The scope of this report focusses on those EU policies with **direct legal/binding effect**, which require the production of a national plan or measures to be adopted by EU MS. These policies are considered a vital entry point for discussing NbS with national ministries. Ministries have legal obligations to fulfil and so understanding where NbS can offer a significant contribution in this regard can help in getting government support for NbS. The report does not consider forest ecosystem NbS. Afforestation and closer to nature forestry management is an important element for meeting climate, nature and water goals and there are EU legal requirements on this which could be further studied to give a fuller picture on NbS opportunities.

Reader

The report consists of an introduction which sets out the general landscape of NbS on a global and national level, followed by a discussion of the four questions outlined above. Each question is addressed in a separate section.

Section 1 provides insights in a schematic format on EU policies that support the inclusion of NbS in spatial planning and includes an overview of their key provisions.

Section 2 gives insights into EU policies that are currently in development that may further impact NbS Implementation, also in a schematic format.

Section 3 sets out the windows of opportunity that exist in key water/nature/climate policy processes in the next 3 years that **NbS actors should be ready to engage** on with some proposals on what NbS actors could specifically advocate for. By understanding the planning processes for these key pieces of EU legislation and understanding compliance deficits/ implementation challenges, NbS actors can be better equipped to propose solutions to the relevant Government actors.

Section 4 offers a flavour of how other European countries are tackling issues that are highly relevant for the Netherlands through enhanced NbS. The selected case studies demonstrate how NbS can be enhanced through a **range of approaches** – including legal, better government coordination and financial innovation.



Introduction

Development of Nature-based solutions globally

In the last decades, increasing attention has been paid globally toward the importance of biodiversity and measures to be taken in relation to the impact of climate change. In many global frameworks, conventions, and initiatives, notably the CBD, UNFCCC, UNCCD, the Ramsar Convention, and the G20 Global Land Initiative, the relevance of biodiversity has been underlined. Most recently in the Kunming Biodiversity Framework, States have made commitments to halt and reverse biodiversity loss by setting ambitious goals and targets for 2030 and beyond. Among others, States have committed to conserve 30% of land, sea and inland waters and to restore 30% of degraded ecosystems. In relation to climate change in the Paris Agreement, States have committed to hold “*the increase in the global average temperature to well below 2°C above pre-industrial levels*” and pursue efforts “*to limit the temperature increase to 1.5°C above pre-industrial levels.*”

NbS have emerged as a unifying framework that integrates earlier concepts such as ecosystem services, ecosystem-based adaptation, green infrastructure, and ecological restoration. At the UNFCCC COP27, NbS emerged for their potential to address climate change and featured in the [Sharm el-Sheikh Implementation Plan](#). NbS also featured in [resolution XIV.17](#) of the Ramsar Convention on Wetlands COP14. Both the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services ([IPBES](#)) and the Intergovernmental Panel on Climate Change ([IPCC](#)) recognise the role of NbS in addressing the twin biodiversity and climate crises.

Definitions of NbS

There are various definitions of NbS.

NL2120 follows the **International Union of Conservation of Nature (‘IUCN’) definition of Nature-based Solutions**: *Nature-based solutions are actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously benefiting people and nature (adopted in February 2025 ²).*

The European Commission defines NbS as “*Solutions that are inspired and supported by nature, which are cost-effective, simultaneously provide environmental, social and economic benefits and help build resilience. Such solutions bring more, and more diverse, nature and*

² [Nature-based Solutions | IUCN](#)



natural features and processes into cities, landscapes and seascapes, through locally adapted, resource-efficient and systemic interventions.”

However, there are also other definitions of NbS. The United Nations defined NbS at the 5th United Nations Environment Assembly (UNEA 5.2), as *“actions aimed at protecting, conserving, restoring, and sustainably managing natural or modified terrestrial, freshwater, coastal, and marine ecosystems, which address social, economic and environmental challenges effectively and adaptively, while simultaneously providing human well-being, ecosystem services, resilience and biodiversity benefits”*.

Evolution of NbS in European Policy

Over the past two decades, the European Union (EU) has increased the positioning of NbS in its climate, biodiversity, water, and urban policies. This shift reflects a growing recognition that healthy ecosystems are not just environmental assets, but essential infrastructure for Europe’s resilience, competitiveness, and well-being. The foundations of EU support for NbS lie in its biodiversity and water directives, which laid the legal foundation for ecosystem-based approaches by requiring EU Member States (EU MS) to protect, manage, and restore natural systems. Annex 1 gives a detailed overview matrix of the policies and their contributions; below, we provide a bird’s eye view over policy development.

In 2013, the EU Green Infrastructure Strategy explicitly introduced the concept of “working with nature” in land-use planning. This was followed by mainstreaming this principle into its climate and innovation policies. The EU Climate Adaptation Strategy (2013, updated 2021) promoted ecosystem-based adaptation — e.g., wetlands for flood control, green roofs for urban cooling — as cost-effective, multifunctional solutions. Horizon 2020 and Horizon Europe research programmes have made huge investments in NbS landscapes.³

With the launch of the European Green Deal (2019) came several important legislative initiatives. The EU Climate Law (2021) embeds the use of ecosystem sinks and NbS into the pathway to net-zero emissions by 2050 and the EU Nature Restoration Law (adopted 2024) legally mandates EU MS to restore ecosystems such as wetlands, rivers, forests using nature-based and ecosystem-based approaches.

The EU has also increased the possibility for implementing NbS into agricultural and regional funding and policy instruments. The recent EU Taxonomy for Sustainable Finance (2020) recognising NbS as eligible green investments, further adds to the public support by encouraging private-sector participation.

Together, these instruments have created a fragmented though broadly enabling policy environment for NbS in the EU. It is increasingly recognized that NbS present a credible

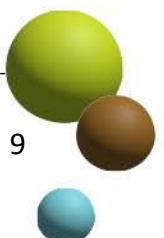
³ [Nature-based solutions - Publications Office of the EU](#)



means to address key societal issues, such as biodiversity loss, climate change, and disaster risk reduction. Moreover, NbS play a pivotal role in delivering on water and flood and drought adaptation. That is why the European Commission actively pursues policy dialogues and outreach initiatives at EU and global level to foster engagement, develop a broad knowledge base and support the uptake of NbS at scale. This commitment to NbS was reiterated by Ursula van der Leyen in her State of the Union address in 2025. However, it is also to be noted that the Green Deal (especially the nature components of it) is increasingly coming under attack in the EU institutions and that the Commission's proposal for the future budget – the Multi-Annual Financial Framework ('MFF') introduces changes that could weaken the focus on funding NbS.⁴ The flexibilities it proposes to introduce would largely leave it to individual member states to decide to prioritise nature in their own national allocations. The negotiations on this MFF proposal will play out over the next 2 years and the outcome will be significant for whether NbS are further mainstreamed across Europe. Dutch government support for prioritising NbS within the relevant MFF instruments is a critical window of opportunity to be acted on. This is important both for the deployment of NbS in the Netherlands but also to create the enabling conditions for Dutch companies to offer their NbS services throughout Europe.

Besides the political challenges set out above there are also barriers to NbS of a different nature, such as physical-ecological, financial and economic, social and cultural, knowledge and institutional. Whilst these challenges also need to be addressed, the focus of workstream 3 and therefore this report is on strengthening institutional knowledge and policy programs. Since the Netherlands is required to comply with EU legislation, our report focuses on the opportunities EU legislation offers to enhance the use NbS. A separate report has been drafted solely related to opportunities for NbS in Dutch national policies.

⁴ <https://eeb.org/whats-left-of-life-commissions-mff-proposal-risks-quiet-rollback-of-eu-environmental-funding-through-budget-lines-not-headlines/>



Section 1 – Existing EU policies supporting NbS

Question 1: What EU policies support the inclusion of NbS in spatial planning? And what are the specific provisions?

In this section, we address this question schematically by setting out in Annex 1 a table containing existing EU environmental and climate policies highly relevant regarding the inclusion of NbS in spatial planning. These are the Water Framework Directive, the Floods Directive, the Marine Strategy Framework Directive, the Birds and Habitats Directives, the Nature Restoration Regulation, the EU Climate Law, the Land Use Land Use Change and Forestry Regulation and the Common Agriculture Policy (CAP) Strategic Plan Regulation. The table sets out the focus of the specific policy, the key provisions relevant for NbS, the Dutch progress on implementation of the policy requirements and key challenges as defined by the European Commission in their reports and opportunities we see for the Netherlands. It also mentions the relevant planning document and its timeline for adoption and update.

This table gives us insight into the EU policies that provide opportunities on including NbS and that NL2120 could focus on and that require a further deep dive to identify more specifically where the opportunities lie.

Section 2 – EU policies in development that may impact NbS implementation

Question 2: Which EU policies are currently in development that may further impact NbS implementation?

In this section, we address this question schematically by setting out in Annex 2 a table containing EU policies in development with legal effect in the Netherlands that are anticipated to be relevant for NbS. These are the EC proposal on the future CAP and a legislative proposal scheduled for end 2026 on an Integrated Framework for Climate Resilience. It sets out the relevant EU policy in development, the focus of the specific policy, the key provisions relevant for NbS and the challenges and opportunities the relevant Dutch authorities may have in influencing these policies.

The table gives us insight into EU policies in development that may further impact NbS implementation and that NL2120 could focus on and that require a further deep dive to identify more specifically where the opportunities lie.



Section 3 – Opportunities to upscale NbS in next 3 years

Question 3: What opportunities exist in the next three years to upscale NbS using the development of national-level plans and strategies required to implement the identified EU policies?

In this section, we addressed this question in the table set out below. It contains a table of key EU environmental and climate policies that need a national-level plan or strategy update in the next 3 years. Text following the table sets out an analysis on these opportunities and defines key steps NbS actors (e.g. NL2120 SODR group) could take to promote NbS in them.

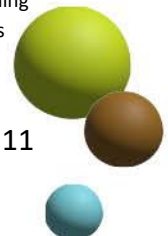
New plans	Revision/update of existing plans	Implementation of updated plans/strategies
National Restoration Plan (to implement the Nature Restoration Regulation) (2026)	River Basin Management plan (2028)	Marine Strategy (updated 2024)
Common Agricultural Policy as part of new National and Regional Partnership Plans (end 2027 ⁵)	Flood Risk Management plan (2028)	
Drinking Water Directive (<i>Recast</i>) (2020/2184), Catchment risk management measures mid 2027	National Energy and Climate Plan (LULUCF) (2028)	

1. Marine Strategy (updated 2024)

All member states of the European Union must develop and adopt a national Marine Strategy/Plan to implement the Marine Strategy Framework Directive⁶ (MSFD), which has an overarching objective of Good Environmental Status (GES). The main pressures in Dutch Marine Ecosystems that must be addressed to meet the overarching GES objective are - bottom trawling & fishing, eutrophication, shipping & maritime transport, marine litter & plastic pollution, sand extraction/dredging, climate change & ocean warming, offshore

⁵ The EC proposal on the next Multiannual Financial Framework and the CAP propose that the future CAP would be part of a larger national and regional partnership plan. This proposal however is currently meeting with significant push-back from co-legislators. However, planning by MS can and should start from an analysis of the issues to be addressed with the support instruments available in the existing CAP plus consideration of the 'Transition payments'.

⁶ [Directive - 2008/56 - EN - EUR-Lex](#)



energy development, invasive alien species, coastal development & habitat fragmentation and noise pollution.

In the recent Marine Strategy⁷, Dutch authorities identified

‘a need for more ‘Integral nature reinforcement’ in offshore activities’ e.g., wind farms, which have the potential to contribute to nature reinforcement. ‘Due to the lack of concrete nature reinforcement measures, it will be investigated which additional measures can contribute to nature restoration in addition to area-based protection.’

The strategy further states

‘Nature-inclusive building is still in a development phase. In this planning period, the concept will be further operationalised.’

Steps for NbS actors:

- Engage with the relevant ministry responsible for the development of the Marine Strategy/Plan with proposals on how to integrate nature reinforcement in **offshore activities** (see case study on offshore wind in Belgium)
- Propose NbS that can contribute to **restoration beyond marine protected areas**; possibilities could include expanding biogenic reefs (oyster reefs and mussel beds) and restoring seagrass meadows. It is noted that there is significant pressure on the sea floor habitats from sand extraction, so any proposed NbS should keep this in mind.
- Propose ideas to the relevant ministries on how **nature-inclusive building** could be operationalised in coastal and marine areas. Possibilities include ‘living shorelines’ - combining soft engineering (vegetation, reefs, sediment trapping) with small-scale hard structures to stabilize vulnerable coasts. Designing dikes with gradual, vegetated slopes that integrate salt marshes or intertidal zones in front. If not already existing, a handbook on practises and how they can be deployed in Dutch systems could be devised for implementing both the MSFD and the marine ecosystem targets of the Nature Restoration Regulation.

2. National Restoration Plan (due September 2026)

The National Restoration Plan (NRP) to be adopted in September 2026⁸, can be regarded a **major opportunity for implementing NbS** within the Netherlands and across the EU. EC Guidance on what needs to be included in the NRP and for each of the restoration targets is available⁹.

⁷ [The Dutch Maritime Strategy 2015 - 2025 | Report | Government.nl](#)

⁸ [Regulation - EU - 2024/1991 - EN - EUR-Lex](#)

⁹ [Nature Restoration Regulation Reference Portal | Biodiversity Information System for Europe](#)



The Nature Restoration Regulation stipulates that all EU MS need to develop an NRP, in which they must set out national contributions to the over-arching targets as regards ‘Restoring at least 20% of the EU’s land and sea areas by 2030 and restoring all degraded ecosystems by 2050’.

This means that, in 2026 the Ministry of Agriculture, Food, Fisheries and Nature (LVVN), responsible for developing the plan, must develop a plan, which is to include measures which address overarching restoration targets, as well as specific ecosystem-based including:

- Reverse the decline of pollinator populations by 2030.
- No net loss of urban green space and tree canopy cover until 2030. Then increase green urban spaces until 2050.
- In agricultural ecosystems improve biodiversity indicators: for grassland butterfly populations, stock of organic carbon in cropland soils and landscape features.
- Increase forest connectivity, deadwood, mixed tree species, and old-growth forests.
- Remove barriers to restore at least 25,000 km of free-flowing rivers by 2030 and related floodplains.
- Rewetting of peatlands and restoration of wetland hydrology.
- Restoration should contribute to climate change mitigation and adaptation, including carbon sequestration and flood risk reduction.

These targets provide an excellent opportunity for the adoption of NbS in agricultural, urban, forest and river/wetland and coastal/marine ecosystems. The table below illustrates a number of NbS examples for each restoration target.

NRR Objective	NbS Examples
Reverse the decline of pollinator populations by 2030	<ul style="list-style-type: none"> • Creation of wildflower meadows and flowering field margins • Agroecological practices: crop diversification, intercropping with flowering species, reduced pesticide use
No net loss of urban green space and tree canopy cover by 2030; increase green space to 2050	<ul style="list-style-type: none"> • Urban tree planting, protection of mature trees • Pocket parks, rain gardens, bioswales (sponge-city features) • Nature-inclusive architecture and green space in new developments
Improve agricultural biodiversity indicators (butterflies, soil organic carbon, landscape features)	<ul style="list-style-type: none"> • Soil regeneration: cover crops, reduced tillage, organic amendments, agroforestry • Landscape mosaics: buffer strips, rotational grazing, permanent grasslands



Increase forest connectivity, deadwood, mixed species, and old-growth forests	<ul style="list-style-type: none"> • Close-to-nature forestry with selective harvesting and longer rotation periods • Passive rewilding: natural regeneration, allowing disturbances (windthrow, natural succession)
Restore 25,000 km of free-flowing rivers and floodplains by 2030	<ul style="list-style-type: none"> • Removal of obsolete dams, weirs, and culverts • Floodplain reconnection by dike breaching or lowering embankments • River re-meandering and riparian buffer re-establishment with native vegetation
Rewetting peatlands and restoring wetland hydrology	<ul style="list-style-type: none"> • Blocking drainage ditches • Paludiculture: cultivating wet-adapted crops without draining peat • Wetland creation and rehydration using natural water flow paths • Beaver-assisted restoration to maintain water retention
Contribute to climate mitigation and adaptation (carbon sequestration, flood risk reduction)	<ul style="list-style-type: none"> • Restoration of carbon-rich ecosystems: peatlands, wetlands, saltmarshes, forests • Blue-green infrastructure in cities for stormwater retention (ponds, swales, wetlands) • Agroforestry and silvopastoral systems

Meeting the restoration targets of the NRR presents a significant challenge for the Netherlands, being among the¹⁰EU MS with a very low share of habitats in “favourable” conservation status; a large share of Dutch habitats included under the NRR will be “in need of restoration”.

Key pressures for the Netherlands to consider in drawing up the NRP include:

- **High nitrogen deposition and intensive agriculture** (major driver of habitat degradation and poor condition and major pressure on water also) for which there is no clear plan of action since the measures proposed for the Nitrogen crises were halted (see Section 4 for case study on Denmark’s Tripartite Agreement as an inspiration on how to tackle this issue).
- **Peatland loss / drained peat soils** (important for meeting climate obligations (LULUCF)) as well as biodiversity and water resilience. Peat rewetting projects exist in

¹⁰ <https://www.clo.nl/en/indicators/en148305-conservation-status-and-trends-in-species-and-habitat-types-under-the-birds-and-habitats-directives-2013>



the Netherlands, but policy and funding are needed for scale-up (see case study on Germany's Moorfutures in Section 4).

- **Fragmented rivers and morphological alterations** - Article 9 of the NRR requires restoring river connectivity and restoration of floodplains. As such the Netherlands will need to scale-up barrier removals and floodplain restoration actions. (see Case studies on Natural Flood Management in Scotland and Germany's Blue belt program for ideas on how this could be delivered).

Steps for NbS actors:

To ensure that NbS are at the core of the NRP that is to be developed in 2026, specific actors in the Netherlands can take specific actions.

First step would be to engage with the Ministry of LVVN to understand what the priorities are and to ensure that NbS are included in the landscapes where the biggest restoration “gains” could come from e.g.:

- **Peatlands - large carbon & biodiversity wins;** see further information under LULUCF and on the Common Agricultural Policy (CAP) below to see why and how this could be done.
- **Rivers & freshwater systems** (barrier removal, floodplain reconnection); the Netherlands has experience on these issues (e.g. Room for the River) but barrier removals and lateral connectivity measures need to be further committed to in the NRP and in the updated River Basin Management Plan (RBMP) and Flood Risk Management Plan (FRMP) and reflected in national policy and funding instruments (further detail set out under RBMP/FRMP below). Recent guidance¹¹ on this has been produced. NbS actors can assess to what extent the necessary steps are being taken by Dutch authorities and identify where restoration measures could be best undertaken in the Netherlands.
- **Coastal & marine habitats** (designation of marine protected areas, designing renewable energy deployment which requires ecosystem protection and restoration, restoring eelgrass and salt marsh ecosystems and integrating nature into bio-reefs); these represent an opportunity to expand the Dutch expertise on NbS in coastal areas into marine waters. These are also issues the Netherlands needs to advance on to better implement the Marine Strategy and the obligations stemming from the MSFD.
- **Farmland / semi-natural habitats** (landscape features, buffer strips, agroecological measures, agroforestry etc.); the development of measures for this will have to be coordinated with the development of the next CAP plan (see below).

¹¹ [Going with the flow: Barrier removal for healthier rivers - Wetlands International Europe](#)



Critical for the NRP ambition and its implementation will be where the **funding** for measures will come from. EU funding for these measures could be made available through the new MFF and the CAP. Consequently, the discussions within the Netherlands on the MFF and in particular the CAP will be important for NbS actors to follow in this regard.

Beyond public finance, NbS actors may also wish to propose innovative public/private finance options to the Government to help fill this financing gap (see examples from Ireland and Denmark in the Peatlands case study in section 4).

3. CAP as part of new National and Regional Partnership Plans (end 2027)

The CAP is likely to remain a large potential source of public funding for NbS on land in the Netherlands and in other EU MS. Therefore, NbS actors should be aware of how the Netherlands currently uses the possibilities for NbS under the CAP, how other EU MS use the CAP possibilities, and should seek to influence the development of new CAP plans in the Netherlands to prioritise NbS to deliver benefits for water, nature and climate.

The existing Dutch CAP strategic plan¹² includes NbS within the Agricultural Nature and Landscape Management scheme (ANLb). This scheme is important as regards the level of funding attached to it and the possibility it offers for collective actions by farmers.¹³

The EC published its proposal for the CAP (2028- 2035)¹⁴ together with the newly configured fund it would be funded under. Negotiations started late 2025 and will have to be finalised by end 2027, with adjustments made by co-legislators. NbS actors should engage at this stage with the possibilities in the EC CAP proposal and make the case for specific NbS schemes to address the known issues in the Netherlands, utilizing the mechanisms such as agri-environment payments, non-productive investments that are likely to be retained irrespective of the political discussions that will last for the next few years.

The Commission's recent CAP proposal introduces several significant changes to the existing framework¹⁵. Notably, these include replacing the system of 'Conditionality' with 'Farm Stewardship' where there would be more flexibility for the EU MS in defining their own standards, eco and agri-environment schemes are merged and a new category of payments - **transition payments** are proposed. These would be one-off/lump-sum support (up to €200,000 per farm) to help farms implement ambitious, clearly defined transformation plans to support an ecological transition.

¹² [Programmadocumenten NSP-GLB | Het Gemeenschappelijk Landbouwbeleid | Netwerk Platteland](#)

¹³ <https://www.rvo.nl/subsidies-financiering/anlb>

¹⁴ [The next chapter for the CAP - European Commission](#)

¹⁵ https://agriculture.ec.europa.eu/media/news/future-cap-proposal-aims-protect-sustainability-and-resilience-farming-2025-10-24_en



Dutch agriculture faces three interlinked environmental/climate challenges where CAP support can make a big difference: nitrogen / ammonia emissions and manure surplus; climate emissions; desiccation and subsidence from drained peat soils and low biodiversity.

Transition payments are an interesting addition to the CAP green architecture and may be well suited because they can cover one-off capital costs and compensate short-term income loss during transition to a more ecologically sound agriculture production system than intensive animal agriculture.

Steps for NbS actors:

- Assess the EC proposal and commentary on it by experts¹⁶ and promote a CAP NbS package as part of a plan for an environmental transition in Dutch agriculture that potentially incorporates these new transition payments (one-off) together with agri-enviro-climate payments (per hectare /ongoing) and non-productive investments (e.g. for actions to reverse drainage and allow soils to re-wet). In certain areas paludiculture could be supported (together with other market support tools via the CAP) and in others restoration could be envisaged. Both re-wetting and re-use require CAP and national finance (e.g. potentially also via an instrument like the UKs Biodiversity Net Gain, see section 4) to deliver payments that would be a viable alternative to the status quo for the agriculture sector.
- Engagement with the EC (DG AGRI) in 2026 is needed to understand what transition and other CAP payments on livestock extensification and nutrient reduction could cover and engagement with the agriculture sector to see if there are farmers who are willing to be supported into such a transition.
- Learn from example EU MS like Denmark where there have been positive experiences with dealing with the same problems that exist in the Netherlands (intensive animal agriculture, eutrophication, need to re-wet drained organic soils, lack of biodiversity in agricultural landscapes). A way forward (political agreement) is set out in the *Tripartite agreement*, and an alternative farming future is also further supported via well supported organic¹⁷ and plant protein strategies¹⁸.
- Seek to understand and build on the existing CAP environmental schemes in the Netherlands– the most significant of which is the ANLb scheme¹⁹. Early discussions with those in the Ministry of LNV around the efficacy of the existing scheme and how this could be enhanced with knowledge from NbS actors could be advanced well ahead of the next CAP implementation period (2028-2035).

¹⁶ [Climate and environment in the Commission's CAP proposal – CAP Reform](#)

¹⁷ [en_oeko_magasinet2025_web.pdf](#)

¹⁸ [Danish-Action-Plan-for-Plant-based-Foods.pdf](#)

¹⁹ [sarah-westenburg-presentation-anlm-boerennatuur-141124.pdf](#)



4. Drinking Water Directive (re-cast)

The 2020 update to the Drinking Water Directive²⁰ (DWD) increased the stringency of certain standards and adds several substances that must be monitored (e.g. for PFAS). The most relevant change however for NbS actors is regarding a strengthened requirement for controlling pollution at source, in the catchment where drinking water is sourced. Article 7 and 8 of the recast Directive set out requirements for risk assessment and risk management of the catchment areas for abstraction points.

The first **risk assessments and risk management measures** in the catchment must be in place by **12 July 2027** and updated at least every six years.

Key compliance problems the Netherlands has with regards to drinking water are:

- Nitrate, phosphorus and pesticide pollution (agriculture)
- Pollutants from pharmaceuticals, consumer products, biocides.
- Raw water (especially surface water) is increasingly contaminated by “micropollutants” such as medication residues, cosmetics, flame retardants, nanoparticles. Many of these can’t be fully removed by standard treatment.

NbS useful to satisfy Article 8

There are many NbS that can contribute to fulfilling the Directive’s focus on catchment risk assessment and management. Depending on the catchment type (agricultural, forest, urban, mixed) some will be more suited than others. Options include riparian buffer strips, constructed wetlands, managed groundwater recharge (enhanced soil management), restoration of floodplains and wetlands, afforestation/reforestation and agroforestry. Detailed analysis and mapping of catchments to provide good spatial data, knowledge of land uses, sources of pollution, flow paths and geology are essential to ensure measures can be sited in the right place and at sufficient scale. These measures may be more cost-beneficial than removing pollutants at water treatment works.

Agricultural pollutant reduction can be incentivized via CAP payments, therefore discussions with both water and agriculture ministries would be essential to advance on agricultural pollutants. For industrial sources of pollutants, a trend towards extended producer responsibility requirements (e.g. updates to the Urban Wastewater Treatment Directive) may mean that companies responsible for pollutants may be willing to fund NbS mitigation solutions in the catchment areas where they operate.

Steps for NbS actors:

- The Netherlands already has an NbS approach in place protecting coastal dune systems to protect drinking water, but extending this approach to other priority land areas could be developed to fulfil the DWD, and the Water Framework Directive (WFD’ and

²⁰ <https://eur-lex.europa.eu/eli/dir/2020/2184/oj>



depending on the type of measure proposed (e.g. reverting to natural habitat), can also deliver on the Nature Restoration Regulation.

- Mandatory measures for drinking water source protection (i.e. legal restrictions) can be included in the River Basin Management Plan of the WFD and then they can be compensated via the WFD compensation payment instrument (Article 72) in the CAP strategic plan. Austria²¹ and Luxembourg²² use this measure in the current CAP strategic plans to compensate farmers for additional mandatory requirements on fertilizers and pesticides in certain areas to protect drinking water quality. The Netherlands could consider such an approach for securing compliance with the enhanced risk management approach of the DWD.

5. River Basin Management plan + Flood Risk Management plan (Dec 2027)

The Netherlands submitted its 3rd RBMP (May 2022) and will now be implementing the measures in that plan and in the preparatory phase for the 4th cycle. Nationally, the Room for the River 2.0 policy was adopted by the Netherlands in April 2025, and a national Spatial Planning Memorandum is in development, which will be the applicable framework for all national government policy on the physical environment²³.

In the EC assessment of the 3rd RBMPs²⁴, specific recommendations were given with regard to NbS which should be kept in mind for the update of plans in the coming years:

“The uptake of nature-based solutions is positive but remains largely project-based; their systematic integration into the Programmes of Measures should be strengthened, with clear links to WFD objectives.”

“There are opportunities to further exploit synergies between WFD objectives and the Biodiversity Strategy through the wider deployment of nature-based solutions in agricultural and hydromorphological measures.”

Steps for NbS actors:

The major pressures in the Netherlands affecting the achievement of good water status are

- chemical pollution
- pollution from agriculture (nitrates, phosphates, pesticides)
- hydromorphological alterations (due to flooding, shipping, agriculture)

²¹ [Shaping the future of rural Austria](#)

²² [07b3f292-b6b4-4ed9-87fd-75768e3b719c_en](#)

²³ <https://open.overheid.nl/documenten/15b4ea56-a08c-4346-a250-53c0aab2ff85/file>

²⁴ eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025SC0032



Therefore, NbS actors should focus on identifying NbS for these pressures to both mitigate existing problems and prevent future deterioration. To date, the water NbS sector has perhaps focused more on addressing hydromorphological pressures but given the challenge in addressing chemical pollution, NbS for these pressures could be developed and promoted to the Dutch Government (possible examples are provided in recent guidance document developed by EU4water ²⁵).

Opportunity may exist at national level to influence the design and delivery for 'Room for the River 2.0' to ensure measures designed for the navigation sector do not undermine the need for reaching good ecological status. In this regard, inspiration could be taken from Germany's Blue Belt programme which is jointly delivered by the transport and environment ministries (see case study in Section 4).

As regards the Delta programme, while the Netherlands is relatively advanced in the EU for formally considering NbS as options for **flood risk mitigation**, options to increase the likelihood that NbS are selected could be proposed to government actors.

Options include:

- legally requiring consideration of natural flood management practises (as has been done in Scotland - see case study in Section 4).
- Developing a fund under the Delta program that only finances NbS and which requires cross-sectoral collaboration (nature/water/climate). The Netherlands could then reflect this in the discussions on the MFF to ensure adequate EU financing for NbS for water/nature/climate is reflected²⁶.

The **agriculture sector** exerts significant pressure on water resources and a way forward on this has been very politically difficult to resolve in the Netherlands. The Netherlands could learn from Denmark on its *Tripartite agreement* to make real progress on water pollution, re-wetting, GHG mitigation and biodiversity loss (see Section 4 case studies for further information on this).

6. National Energy and Climate Plan (agriculture and land-use action specifically under ESR and LULUCF) (2028)²⁷

All EU MS must update their National Energy and Climate Plan regularly and the next update is due by 2028. The Netherlands may be taking insufficient action to deliver on actions for

²⁵ [EU4ENVWaterData_NbSCatalogue-water-EaP_Sept24_VF.pdf](#)

²⁶ CZ note to ENV council on missing funds for nature, October2025 [pdf](#)

²⁷ Agricultural emissions are accounted for under both the LULUCF Regulation and the Effort Sharing Regulation (ESR), with a split based on the greenhouse gas (GHG) and the type of land use. Non-CO2 emissions (like methane and nitrous oxide) from the agriculture sector are covered by national targets under the ESR, while CO2 emissions or removals from agricultural lands are reported and accounted for under the LULUCF Regulation



agricultural nitrogen (included under Effort Sharing Regulation (ESR)) and addressing emissions from drained organic agricultural soils/peatlands (included under Land Use Land Use Change and Forestry (LULUCF)) which were included in the Dutch submission to the EC on its first National Energy and Climate Plan (NECP)²⁸. Measures included in the NECP on these issues (farmer buy-outs to respond to the nitrogen crises and re-wetting of organic soils/peatlands) are understood to have been largely stopped when the 2024 government took office and no new measures of a similar scale seem to have been advanced. This creates an important legal lacuna where a solution needs to be urgently found.

The EC's proposal²⁹ for a new climate 2040 target (90% net emission reduction) has been adopted. As such the need for the agriculture sector to positively contribute (under both ESR and LULUCF) to meet the revised climate targets for 2040 is increasingly important for any Dutch government to find solutions on.

Under the Dutch Climate Act ("Klimaatwet"), the government is required to produce a national climate plan at least every five years. In March 2025, the Dutch Government presented the **final draft** of the Climate Plan 2025-2035 to both the lower and upper houses of parliament. The plan outlines how the Netherlands aims to reach climate neutrality by 2050, including measures in sectors like energy, transport, agriculture, industry, built environment, land use, etc. Some experts and the Netherlands Environmental Assessment Agency (PBL) have expressed doubt that the current measures in the draft plan will be sufficient to meet the legally binding targets (e.g. 55% reduction by 2030).

Steps for NbS actors:

- Advocate to government (Ministries for climate, water, nature, and agriculture collectively) for the prioritisation and funding of NbS on agricultural land to address agriculture's climate impact and meet water and nature targets.
- Devise an agricultural peatland re-wetting scheme to be funded under the CAP (supplemented by private finance) utilising a combination of the tools used by other EU MS for similar issues. Combining compensation payments for re-wetting, agri-environment-climate commitments, non-productive investments and potentially transition payments (see earlier information on the CAP in this section).
- NbS actors and/or Dutch government could engage with DG AGRI to understand better the possibilities via the transition payments in the EC CAP proposal for post 2027³⁰.
- Propose priority NbS schemes to be included within the next CAP, necessary for securing compliance with other enviro/climate obligations (e.g. drinking water catchment schemes in-line with the updated Drinking Water Directive).
- One clear priority under both LULUCF and the NRR for the Netherlands is:

²⁸ [Netherlands - Final updated NECP 2021-2030 \(submitted in 2024\) - European Commission](#)

²⁹ [2040 climate target - Climate Action - European Commission](#)

³⁰ https://agriculture.ec.europa.eu/media/news/future-cap-proposal-aims-protect-sustainability-and-resilience-farming-2025-10-24_en



Re-wetting of peatlands:

- As identified in the Dutch assessment feeding into the preparation of its plan of action for LULUCF 'The largest source of carbon emissions from LULUCF is from oxidation of organic soils (peat and peaty soils) due to drainage and cultivation resulting in ground surface lowering and an estimated emission of 5.6 Mton of CO₂. The majority of emissions (4.1 Mton CO₂) are from drained peat meadows in the western and northern part of the Netherlands which are important areas for dairy farming³¹. It will be vital that options for re-wetting and the subsequent land-use are advanced with the agricultural sector.
- Lessons could be learnt from Denmark (which has similar issues as regards climate emissions from peat soils), on how they were able to reach political agreement for re-wetting (together with other nature and water actions in agriculture) and how such measures are going to be implemented on the ground, through CAP funds, other public and private funds (see case study on Denmark's Tripartite agreement and case study on Peatland restoration in Germany).

Section 4 – Examples of European best practices

Question 4: What are examples of best practices of policy transposition from other European countries in integrating NbS into spatial planning that could be applied in the Netherlands?

This section aims to outline examples of European best practices of policy transposition from other European countries in integrating NbS into spatial planning that could be applied in the Netherlands. These examples are used to illustrate possible routes / options / strategies, from which lessons can be drawn for the Netherlands. With each example, recommendations are formulated for NbS actors.

Best practices were selected based on the following considerations:

- Policies that have the potential to deliver transformative change (not just isolated project/pilot examples).
- Those that can address some of the most pressing issues that the Netherlands faces (lack of progress on agriculture, lack of biodiversity)
- Those that can build on and expand the existing know-how of the (water management) focused NbS sector in the Netherlands.

The table below shows the resulting list of example best practices.

³¹ https://www.rvo.nl/files/file/2023-08/NLD%202020_529-art10_20201203.pdf

Case studies	
1. Biodiversity Net Gain UK	Creation of a nature market: attracting private finance for habitat restoration
2. Denmark- Tripartite Agreement for greening Agriculture	Historic multi-sectoral and political agreement on how to transform DK agriculture to meet environment, climate and nature objectives (with prominent role for NbS)
3. Restoring Peatlands	Germany Moorfutures - Peatland re-wetting and restoration, carbon credit scheme
4. Copenhagen Cloud Burst Management Plan	Climate adaptation in urban areas to deal with flash flooding
5. Germanys Blue Belt	A national initiative to address navigation sector hydro morphological alterations and improve river corridors and floodplains
6 Natural Flood Management (Scotland)	Putting natural flood management on a legal basis
7. Marine restoration	Delivering renewable energy and nature restoration in the Belgian North Sea

Both the Danish (Tripartite Agreement) and English (BNG) examples were highlighted in recent high-level NbS events as major policy changes happening in European countries that will significantly drive the uptake of NbS³². Other case studies are those known by the author with significant EU-level experience in this area and those proposed by other policy makers and researchers working on NbS in the context of implementing EU environmental and climate policy. Many are included in existing repositories of EU NbS.

1. Biodiversity Net Gain (UK law)

Under English law, the legal requirement for biodiversity net gain (BNG) was introduced in 2024. The statutory requirement for BNG comes from the Environment Act 2021. The mandatory BNG requirement enters into force in stages from January 2024 onwards.³³

The key legal highlights include:

³² [NetworkNature Science-Policy Workshop | NetworkNature](#)

³³ [Biodiversity net gain - GOV.UK](#)

- A **mandatory BNG requirement of 10%** for most developments in England, with at its core that for each development, developers must demonstrate a 10% biodiversity uplift.
- BNG must be secured for **at least 30 years**, through legal agreements or conservation covenants.
- **BNG will apply to new planning applications** under the Town and Country Planning Act 1990, unless exempt.
- All BNG calculations must be conducted using the [Biodiversity Metric](#) developed by Natural England (English, Nature Agency).

Under the law, developers must meet the following criteria:

- Submit a **Biodiversity Gain Plan** for approval before development begins.
- Demonstrate a **10% biodiversity uplift** using Natural England's approved metric.
- Maintain and monitor habitat gains for **at least 30 years**.
- Secure the BNG delivery legally via a **Section 106 Agreement** or a **Conservation Covenant**

Failure to comply may result in planning refusals, enforcement action, or inability to discharge planning conditions.

There are various ways to achieve BNG. This can be done through site selection and layout; developers should avoid or reduce any negative impact on biodiversity. They must deliver at least 10% BNG, as measured by the [Statutory Biodiversity Credits | Local Government Association](#).

There are 3 ways a developer can achieve BNG.

- They can create biodiversity **on-site** (within the red line boundary of a development site).
- If developers cannot achieve all their BNG on-site, they can deliver through a mixture of on-site and **off-site**. Developers can either make off-site biodiversity gains on their own land outside the development site or buy off-site biodiversity units on the market.
- If developers cannot achieve on-site or off-site BNG, they must **buy statutory biodiversity credits** from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England.

Developers can combine all 3 options but must follow the steps in order. This order of steps is called the [biodiversity gain hierarchy](#).

Since the UK is no longer a member of the EU, the UK may not adhere entirely to the EU legislation. Consequently, should the Netherlands be interested in implementing similar legislation as BNG it needs to take EU legislation into account in its design. Specifically, article 6.4 of the Habitats Directive should be taken into consideration in this regard.



2. Denmark- Tripartite Agreement for greening Agriculture

A political and stakeholder deal was struck in June 2024 between the Danish government, farmers' organisations, environmental NGOs, industry, trade unions, and local authorities³⁴. Its goal is to transform Denmark's agricultural and land-use practices to reduce greenhouse gas emissions, restore nature and water quality, and meet ambitious climate and biodiversity targets.

Key Elements:

- **Climate tax on agricultural emissions**

A tax on CO₂/methane emissions (livestock, emissions from disturbed carbon-rich soil, etc.). There's a built-in "basic deduction" (60%) so that farms that are more efficient benefit.

Starts in 2030: **DKK 120/tonne** CO₂-eq after deduction. Increases to **DKK 300/tonne** in 2035.

- **Land-use changes / nature restoration**

- Remove / rewild low-lying, carbon-rich soils used for agriculture, turn farmland into forests, wetlands.
- Planting new forest areas.
- Converting a percentage of farmland back to more natural habitats.

This includes 140,000 hectares (ha) of low-lying soils to be removed from cultivation by 2030. 250,000 ha of new forest to be planted by 2045. CAP payments are envisaged to be used to pay for these actions.

- **Nitrogen / water quality**

Reductions in nitrogen runoff (from fertilizers etc.) to protect waterways, fjords, coasts. Improved targeted regulation and support (including buy-out of farms and land swaps).

- **Funding / support mechanisms**

In Denmark the political priority for the government and all of society is clear through the adoption of the Tripartite agreement. This makes it easier for the private sector to then see where it can align and contribute.

A "Green Area Fund" (~40-43 billion DKK) has been established to support afforestation, rewetting, land purchases, paying farmers to convert land or cease agriculture in certain areas. Private foundations (e.g. Novo Nordisk Foundation)³⁵ have provided considerable funding to support the green transition in Danish farming.

³⁴ [About the agreements on a Green Denmark - Ministeriet for Grøn Trepert](#)

³⁵ [Framework confirmed for the Novo Nordisk Foundation support for a greener Denmark through the Green Tripartite agreement - Novo Nordisk Fonden](#)



3. Germany MoorFutures - Peatland re-wetting and restoration funded via voluntary PES/carbon credit scheme

MoorFutures is a voluntary carbon-credit scheme focused on the rewetting/restoration of drained peatlands in Germany³⁶. It was initiated in 2011 by the state government of Mecklenburg-Western Pomerania in Germany to address the large amounts of greenhouse gases from drained peatlands and is active in several German federal states: Mecklenburg-Western Pomerania, Brandenburg, and Schleswig-Holstein.

Key Elements:

- **Measurement, reporting, verification:** The standard has a methodology (for peatland GHG fluxes) including the “GEST” (Greenhouse Gas Emission Site Type) approach for modelling baseline vs. project scenario. The standard requires permanence: - land-use change and rewetting measures must be maintained for 30-50 years or more.
- **Projects** involve e.g. buying or securing peatland areas, rewetting them (blocking drainage, raising water tables), monitoring the emission reductions, and then making those reductions available as credits.

One **MoorFutures credit** is typically defined as one tonne of CO₂ equivalent emission reduction (or avoided emission) from peatland rewetting. MoorFutures helps channel private funding (via purchase of credits) into peatland restoration, beyond public funding. With Germany’s first National Peatland Protection Strategy adopted in 2022, peatland restoration is gaining more policy attention. *Beyond Germany*

Other countries who are developing the necessary steps for attracting private finance to Peatland Restoration include:

- The UK
 - [Peatland Code | IUCN UK Peatland Programme](#) and [The Great North Bog – The UK’s Peatland Restoration Partnership](#)
- Ireland
 - [Peatland Finance Ireland](#)

Together with attracting private finance for re-wetting, Germany, Denmark, Finland, and Ireland are among countries who are devising land management schemes for peatland re-wetting and restoration via the CAP³⁷. Learning from the implementation of these schemes together with the schemes the Netherlands has implemented via the CAP will help determine what the next steps for peatland restoration can be at a national level.

³⁶ [MoorFutures - Klimaschutz trifft Biodiversität](#)

³⁷ [The integration of peatlands into the EU Common Agricultural Policy: Recent progress and remaining challenges - ScienceDirect](#)



A further very important consideration will be developing market support for the new crops that would be grown on re-wetted lands. The Netherlands Wetland Products Foundation already promotes paludiculture biomass for paper and construction.

Other countries' strategies could be investigated, such as Germany's PaludiZentrale project which supports market creation for cattail and reed insulation, and Germany's Programme for Natural Climate Buffers which has €1 billion dedicated to voluntary measures by farmers to raise water levels in peatlands and develop new value chains for peatland conservation³⁸.

4. Copenhagen Cloud Burst Management Plan

The Cloudburst Management Plan³⁹ is a city-wide strategy for dealing with extreme rainfall events. The strategy was adopted by the City of Copenhagen in 2012 after the high-intensity rains in the summer of 2010 and 2011, to complement the Copenhagen Climate Adaptation Plan adopted a year earlier.

The objective of the Cloudburst Management Plan is to reduce the impact of flood events because of heavy rains which are expected to increase in frequency because of climate change.⁴⁰ To implement the plan, the city aims to realise 300 projects over 20 years. Every year, the city decides which projects will be undertaken through a prioritisation process that ensures new projects are implemented in high-risk areas, areas where measures are easy to implement, or areas where new investments can be connected to ongoing urban development projects.

Two masterplan variations were developed to assess costs and potential advantages and disadvantages of different potential solutions:

- The **Conventional Masterplan** option focused on grey engineering solutions such as increasing the diameter of sewage pipes to funnel floodwater to the harbour.
- The **Blue-Green Masterplan** option focused on potential of NbS that store or drain excess water at ground level, such as opening streams, constructing new canals or establishing lakes and more green spaces.

The **Blue-Green Masterplan** has turned out to be significantly more cost-effective - without even considering additional qualitative social benefits such as health, environmental, and urban spatial quality improvements. The final set of solutions chosen combines majority of NbS with piping and tunnels in those areas of the city where ground level drainage is not possible.

³⁸ [Germany is promoting peatland restoration as part of national climate strategy | EUROPE: GERMANY | Agrospecials](#)

³⁹ [Cloudburst Management Plan - Copenhagen | Interlace Hub](#)

⁴⁰ [file](#)



The plan is jointly implemented and financed by the City of Copenhagen, the Greater Copenhagen Utility Company and private actors such as private landowners. The costs are also paid by citizens and businesses through the payment of water fees based on consumption.

As the Netherlands also faces more extreme weather, including extreme rainfall, it can be beneficial to investigate this management plan and see which elements could be used in the Netherlands.

5. Germany's Blue Belt – addressing hydromorphological alterations from navigation via cross-sectoral working

Germany's *Blue Belt Program*⁴¹, launched in 2017 by the Federal Ministries of Transport and Environment, is a long-term national framework to restore and enhance the ecological, social, and economic value of federal waterways by 2050. It aims to transform **underused waterways** into vibrant, multifunctional landscapes that support biodiversity, recreation, and regional development while maintaining navigational and flood protection functions.

In the past, the planning, coordination and implementation of ecological measures on federal waterways had shown there were different views on the existing obligations, possibilities and leeway of the Federal Waterways and Shipping Administration (WSV). For example, the demarcation between the responsibilities of the Federation and the Länder was controversial. The unclear legal situation did not allow the WSV to implement extensive ecological projects on the waterways.

With the "Act on the Water Management Expansion of Federal Waterways to Achieve the Management Objectives of the Water Framework Directive", which came into force on the 9th of June 2021, the responsibilities of the WSV were significantly expanded. Its task now is to expand the federal government's inland waterways in terms of water management to meet the objectives of the WFD.

The *Blue Belt* envisions a dual focus:

- **Core Network (Primary Waterways)** – Major rivers like the Rhine, Elbe, Danube, and Weser that remain crucial for freight transport; restoration here is limited but strategic.
- **Secondary Network** – Smaller rivers with declining freight use, such as the Lahn and Oder, offering greater potential for ecological and recreational restoration.

The guiding principle is "*Something is possible everywhere.*"

⁴¹ [Germany's Blue Belt Programme | BFN](#)



The program began with analyses to identify **restoration needs and potential** across federal waterways, integrating ecological surveys, hydrological data, and land use information. Several pilot projects (e.g. EU funded LIFE project on the Living Lahn) tested ecological measures—like reconnecting flood channels, modifying groins, restoring riverbanks, and creating islands—demonstrating that ecological improvement and navigation can coexist⁴². These projects highlighted the need for **legal adjustments and inter-agency collaboration to scale restoration**.

At the national level, the **Blue Belt Advisory Board**—comprising ministries, NGOs, tourism, sports, and regional authorities—provides strategic guidance.

A central component, *Habitat Network Concept*, connects habitats along waterways to improve biodiversity and ecological connectivity. It integrates “core” ecological stepping stones within navigable rivers and large-scale restoration on secondary waterways.

The Blue Belt contributes towards the implementation of the Water Framework Directive, Habitats Directive, National Water and Biodiversity Strategies, and the EU Nature Restoration Law. It has a significant and **enduring funding stream** to pay for restoration activities.

6. Changes to Scotland’s Flood laws to legally require consideration of Natural Flood Management

Under Scottish law⁴³, consideration of Natural Flood Management (NFM) was integrated into law in 2009. The Flood Risk Management Act⁴⁴ (FRM Act) introduced a more sustainable, catchment-scale and integrated approach to managing flood risk across Scotland.

NFM is generally defined under Scottish policy / guidance as techniques that *work with natural features and processes* (e.g. woodlands, floodplain restoration, wetlands) to manage sources and pathways of flood water, in contrast to “traditional hard engineering.”

The FRM Act requires SEPA (Scottish Environment Protection Agency) and “responsible authorities” **to consider** whether techniques that restore, enhance or alter natural features and characteristics can contribute to managing flood risk. That is, NFM must be part of the toolbox when planning flood risk management.

⁴² Further detailed analysis of this programme can be found in the EU funded project MERLIN [CS10 BlueBelt_DE_RSP.pdf](#)

⁴³ This law, still in effect, was adopted to implement both the Water framework and Floods directive EU objectives. Although Scotland has left the EU, the policy remains EU relevant

⁴⁴ [Flood Risk Management \(Scotland\) Act 2009](#)



Section 20 of the FRM Act requires SEPA to produce national maps identifying **opportunity areas for NFM**, where NFM techniques might be most effective⁴⁵. Authorities are required to identify actions to manage flood risk, including “*so far as practicable*” sustainable actions or nature-based actions. Also, SEPA’s guidance (Natural Flood Management Guidance) explicitly states that when developing flood risk management strategies/plans, NFM should be considered, especially where hard defences may be inappropriate or to complement them.

To build on what Section 20 and existing plans have done, the National Flood Resilience Strategy (December 2024) sets a long-term vision through to 2045 and beyond. It emphasises community action, sustainable land use, and **flood-adapted spaces**.

If not already done, an **opportunity mapping** approach like this could be done by NbS actors to identify priority areas for natural flood management. The identification of areas and engagement with communities on the ground to seek their support for such measures makes it easier for Governments to include such areas in national programmes and plans. A legal requirement on ministries/agencies to consider NbS for flood defence could enhance the roll out of such approaches.

7. Marine Restoration in Belgium- Joint action on nature and renewable energy development

An innovative and cross-sectoral approach in Belgium aiming to position offshore wind zones as enabling infrastructure for nature restoration and protection not just energy production zones was signed up to in June 2021 by Belgian Offshore Platform (BOP) and NGO coalition 4Sea⁴⁶ through a letter of intent⁴⁷.

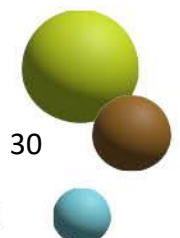
The Belgian part of the North Sea (BNS) is undergoing a significant expansion of offshore wind energy: by 2020, about 2.262 GW (covering 238 km²) was operational, and new zones (≈ 284 km²) have been delineated to reach ~4.4 GW capacity. These zones overlap or lie adjacent to EU protected areas (Natura 2000 sites) and sensitive marine habitats, thereby creating both risk and opportunity for biodiversity.

Offshore wind farm development traditionally poses risks to marine ecosystems: turbine foundations and cable systems can alter hydrodynamics, affect seabed habitats, disturb migrating fauna, generate noise, and introduce electromagnetic fields. The challenge is how to integrate renewable energy infrastructure with marine ecosystem integrity and

⁴⁵ [Microsoft Word - NFM_summary_FINAL.doc](#)

⁴⁶ Bond Beter Leefmilieu, Greenpeace Belgium, Natuurpunt vzw and WWF-Belgium

⁴⁷ [a29cdb15-offshorewindpark-eng-vfinal_24062021.pdf](#)



biodiversity gains — i.e., how to use design, operation and decommissioning of offshore wind as a NbS for marine environments.

The commitment from BOP and environmental NGOs sets out a series of principles aimed at leveraging offshore wind zones for positive nature outcomes:

- **Nature-inclusive design:** Placement, foundation choice, materials and layout are selected to minimise impacts and maximise reef-/habitat-effect opportunities (for fish, benthos) during construction/operation.
- **Habitat restoration & creation:** Within or adjacent to wind zones, there is ambition to conserve existing habitats (e.g., gravel beds, sandbanks) and create new natural value (e.g., artificial hard substrate) where appropriate.
- **Multiple-use zoning with nature priority:** The marine spatial plan foresaw wind farm zones where marine nature is protected, and in some zones, multiple uses (e.g., low-impact aquaculture, measurement posts) may be incorporated — provided they do not compromise ecological objectives.
- **Lifecycle thinking / circularity:** From construction to decommissioning the wind infrastructure, the approach demands continuity of nature values and reuse of zones for future energy production with nature as a guiding principle.
- **Monitoring & adaptive management:** The long-running monitoring programme provides over 10 years' data on ecosystem responses, allowing adaptive design and mitigation of negative impacts.

Key lesson from this case study is that joint sectoral position papers can make progress easier for Governments in navigating potentially conflicting issues. Infrastructure can be nature-positive if it is designed with ecological objectives from the outset. NbS actors in the Netherlands could seek to develop a similar approach with the energy and other coastal sectors (e.g. for low trophic aquaculture alga, shellfish, or bio-reef design) to develop solutions that meet multiple benefits and therefore are less likely to meet with planning delays.

While the Netherlands is arguably a front-runner in Europe in its coastal NbS for flood risk reduction, there is more that could be done both in the Netherlands and throughout Europe in terms of NbS for marine restoration. This will become increasingly important for implementing both the Marine Strategy Framework Directive and the marine ecosystem targets under the Nature Restoration Regulation.

Conclusion

This report set out to understand the role of EU policy in providing an enabling framework for the implementation of NbS in the Netherlands. The existing EU legislation increasingly



sets deadlines by when to achieve overall ecosystem health targets and requires the adoption of statutory plans and measures to achieve the targets. This provides a framework that largely **encourages the use of NbS but is not prescriptive** that such solutions must be deployed. As such, national decisions on **how** to implement EU legal obligations are very important.

Next steps/future work

The report gives insights and best practices of NbS applied by other EU MS that the Netherlands could take into account when considering measures to comply with EU legislation. The analysis and ideas in the report are intended to serve as a basis for discussion between NbS actors on priority action in the short term. Future work could then go more into detail on selected policy areas or mechanisms for NbS deployment.



Annex 1 - Adopted EU Policies with legal effect relevant for NbS

EU Policy (date)	Planning document (timeline)	Focus: climate, water, biodiversity Key objectives	Key provisions relevant for NbS	NL progress and key challenges
EU Water Framework Directive (2000/60)	<p>River Basin Management Plan 1st RBMP 2010-2015 2ND RBMP 2016-2021 3rd RBMP 2022-2027 4th RBMP 2028-2033</p> <p>Deadline: Good status in all waters to be reached by 2015, and then by extending deadlines to 2027</p> <p>NL submitted its 3rd RBMP, and will now be in the preparatory phase for the 4th cycle (plans to be adopted and submitted to EC Dec 2027)</p>	<p>Overarching EU directive on water establishes a framework for the protection of inland surface transitional, coastal and groundwater.</p> <p>Legally binding objectives defined in Article 4.1.</p> <p>-prevent the deterioration of the status of all waters achieve good status for all waters -reverse any upward pollution trend in groundwater -reduce pollution from priority substances and phase-out priority hazardous substance comply with any standards and objectives for protected areas</p> <p>MS must assess the status of their water bodies, identifying significant pressures affecting the achievement of GS.</p> <p>Programs of measures must be defined to address the pressures and</p>	<p>To reach good ecological status (or potential for heavily modified WBs) for surface waters requires addressing hydromorphological alterations /securing favourable hydromorphological conditions that can support the biological communities consistent with good status (e.g. plants and fish).</p> <p>This includes restoring river connections with floodplains, re-naturalising the river bank, re-meandering and removing barriers for fish migration.</p> <p>To address pollution, MS must establish a system of permits/controls. Beyond this NbS can be programmed.</p> <p>Natural processes and ecosystems can be deployed to reduce, prevent and remediate pollution. E.g. rural land-management contracts (organic,</p>	<p>NL has the worst overall water status in the EU, with less than 1% of waters at good status.</p> <p>EU overall is 39.5% of WB at good status.</p> <p>Major pressures in NL affecting the achievement of GS are chemical pollution, pollution from agriculture (nitrates, phosphates, pesticides) hydromorphological alterations (due to flooding, shipping, agriculture)</p>

		included within a River Basin management Plan.	afforestation) in drinking water protected areas to protect GW	
EU Floods Directive (2007/60/EC)	<p>Flood Risk Management Plan (FRMP)</p> <p>1st cycle 2010-2015. 2nd cycle 2016-2021. 3rd cycle 2022-2027. 4th cycle 2028-2033</p> <p>(second FRMPs to be adopted and submitted to EC Dec 2027)</p>	<ul style="list-style-type: none"> - Directive focuses on the assessment and management of flood risks. - MS are required to <ul style="list-style-type: none"> o assess all areas where significant floods could take place o map the flood extent and assets and humans at risk in these areas. Create and update Flood Hazard Maps and Flood Risk Maps o set their own flood risk management objectives and take adequate and coordinated measures to reduce flood risk o take appropriate steps ...'achieving common synergies and benefits having regard to the environmental objectives laid down in the WFD' 	<ul style="list-style-type: none"> - The Flood Risk Management Plans need to include "<i>non-structural</i>" measures, which reduce the likelihood of flooding. - Non-structural measures include NbS. - Article 7 of the Floods Directive requires that Flood Risk Management Plans take into account - "<i>...areas which have the potential to retain flood water, such as natural flood plains, the environmental objectives of article 4 of Directive 2000/60/EC, soil and water management, spatial planning, land use, nature conservation</i>". 	<ul style="list-style-type: none"> - The EC assessment on existing FRMPs found <p><i>'the NL FRMP does not refer to the use of CBA or other economic analysis of its measures, although the law requires the FRMP to take account of costs and benefits. The FRMP states that the funding of measures is primarily at national level. The Delta Programme, a number of whose measures target FRM, arranges its financing through the national Delta Fund. The use of cost-benefit analysis or related methods is not mentioned in the FRMP'-</i></p>
The EU Drinking Water Directive (recast) (2020/2184)	Risk assessment and risk management of the catchment areas for abstraction points of water intended for human	<ul style="list-style-type: none"> - The update of the directive aims to: <ul style="list-style-type: none"> - Ensure safe and clean drinking water for all Europeans, 	<ul style="list-style-type: none"> - NbS offer practical, cost-effective, and resilient solutions to implement the 'risk-based approach' of the recast Drinking Water Directive. 	The Commission opened infringement proceedings against the Netherlands, in 2024 for not correctly transposing several key provisions of the directive

	consumption to be carried out for the first time by 12 July 2027	<ul style="list-style-type: none"> - Improve monitoring and risk assessment, and - Promote sustainable water management. - A major shift in the recast directive is its “risk-based approach” requiring Member States to assess and manage risks from source to tap (i.e. catchment → supply → distribution → consumer). 	<ul style="list-style-type: none"> - NbS can be measures for risk management in drinking water supply zones. E.g addressing pressures like pesticide and nutrient pressures at source, rather than relying on treatment of water for human consumption - Key provisions are set out in Article 7 + 8 	<p>into its national legislation. These include articles 7 and 8.</p> <p>Therefore, there may be a window of opportunity for NbS actors to engage in this to ensure better source protection measures are adopted into legal requirements.</p>
Marine Strategy Framework Directive (MSFD) (2008/56/EC)	<p>MS must develop national marine strategies to achieve or maintain GES.</p> <p>Deadline – 2020 MS must review + update their national strategies every 6 years in coordination with other MS in regional seas</p> <p>1st cycle 2012-2017 2nd cycle 2018-2023 3rd cycle 2024 – 2030</p>	<ul style="list-style-type: none"> - Directive aims at protecting the health of coasts, seas and oceans. - Its aim is to achieve Good Environmental Status (GES) - Through the MSFD, the ecosystem-based approach became a legally-binding principle for managing the EU’s entire marine environment. - MSFD objective of GES is defined by 11 descriptors. 	<p>-Main Pressures in Dutch Marine Ecosystems</p> <ul style="list-style-type: none"> o Bottom trawling & fishing, eutrophication, shipping & maritime transport, marine litter & plastic pollution, sand extraction / dredging, climate change & ocean warming, offshore energy development, invasive Alien species, coastal development & habitat fragmentation and noise pollution <ul style="list-style-type: none"> - These pressures can be addressed by using NbS 	<ul style="list-style-type: none"> - The Dutch plan to implement the MSFD, The Marine Plan identified <ul style="list-style-type: none"> o a need for more ‘Integral nature reinforcement’ in offshore activities o <i>and ‘due to the lack of concrete nature reinforcement measures, it will be investigated which additional measures can contribute to nature restoration in addition to area-based protection’.</i> - NbS include biogenic reefs, seagrass restoration.
Birds (Directive 79/409/EEC, updated and codified)	Special Protection Areas (SPAs) under the BD	<p>Birds Directive</p> <ul style="list-style-type: none"> - Protect <i>all wild bird species</i> naturally occurring in the EU. <ul style="list-style-type: none"> o Protect birds, nests, eggs, habitats. 	<ul style="list-style-type: none"> - NbS can be used to address factors affecting unfavourable conservation status e.g. 	<ul style="list-style-type: none"> - Key NL challenges <ul style="list-style-type: none"> o Declining Meadow Birds due to Agricultural Intensification

<p>Directive 2009/147/EC and Habitats Directives (Directive 92/43/EEC)</p>	<p>Special Areas of Conservation (SACs) under the HD SAC + SPA together makes the Natura2000 network</p>	<ul style="list-style-type: none"> ○ Ban killing/capturing except under strict derogations. ○ Establish Special Protection Areas (SPAs) for threatened and migratory birds. <p>Habitats Directive (1992)</p> <ul style="list-style-type: none"> - Conserve <i>natural habitats</i> and <i>wild fauna and flora</i> other than birds. <ul style="list-style-type: none"> ○ Protect species and habitats at risk, require assessments before damaging plans/projects. ○ Broad range of habitats (terrestrial, freshwater, marine) and species of EU concern. ○ Overarching objective is to designate sites and then achieve favourable conservation status of habitats and species 	<ul style="list-style-type: none"> ○ measures on agricultural land to prevent losses of nitrogen ○ blocking drains to raise water tables and restore wetlands 	<ul style="list-style-type: none"> ○ large majority of habitat types are assessed as “unfavourable” Conservation Status ○ Nitrogen Deposition, desiccation (low water tables, drainage), ○ Legal cases (both from EU Commission and national courts), require addressing nitrogen issue.
<p>Nature Restoration Regulation (directly applicable in national law)</p>	<p>Member States must submit National Restoration Plans (NRPs) in the standardised format by 1 Sept 2026.</p> <p>Final plans to be adopted end 2026.</p>	<ul style="list-style-type: none"> - Over-arching targets set out in Article 4 <ul style="list-style-type: none"> ○ Restore at least 20% of the EU's land and sea areas by 2030 ○ Restore all degraded ecosystems by 2050 - Specific ecosystem-based targets set out in Article 5- 13 Art 5 Marine, Art 8 urban, Art 9 rivers and floodplains, Art 10 pollinators, Art 11 Agricultural 	<ul style="list-style-type: none"> - NbS can be used for many actions, e.g. <ul style="list-style-type: none"> ○ address habitat condition of existing protected sites ○ raise the water table on drained peat soils ○ restore river floodplains ○ design offshore energy with nature benefits 	<ul style="list-style-type: none"> - As the NL is a very densely populated country, with high land prices, finding room for ecosystem restoration /NbS will be a challenge. - Identifying those land areas which provide multiple ecosystem services may be a useful way to approach implementation/prioritisation - Priorities that the NRP could be expected to cover include

		<p>ecosystems, Art12 Forest ecosystems, Art 13 3 billion trees.</p> <ul style="list-style-type: none"> - Restoration should contribute to climate change mitigation and adaptation, including carbon sequestration and flood risk reduction. 		<ul style="list-style-type: none"> o Habitat condition of existing sites, o nitrogen deposition and intensive agriculture with low biodiversity o Peatland loss / drained peat soils o fragmented rivers
<p>EU Climate law (Regulation (EU) 2021/1119): Governance Regulation (Regulation (EU) 2018/1999)</p>	<p>National Energy and Climate Plans EU Member States must update their (NECPs) every two years to align with evolving EU targets and legislation.</p> <p>Next draft updates due by January 1, 2028, for the period 2031-2040, with final versions due January 1, 2029.</p>	<ul style="list-style-type: none"> - Sets overall EU climate mitigation goals in law <ul style="list-style-type: none"> o reduction targets of GHG emissions by 55% 2030, o net Zero by 2050 - sets obligation on MS to report on adaptation actions in their NECP (this can be through the adoption of an Adaptation plan or strategy) 	<ul style="list-style-type: none"> - NbS are most relevant to address climate greenhouse gas emissions and removals from the land use sector - NbS can be used to reduce the losses of GHGs from fertilised agricultural soils - And to rewet drained organic soils. - NL has adopted a national Adaptation plan. - NbS are a component of the existing overall adaptation strategy 	<ul style="list-style-type: none"> - It's not clear that the measures included in the current NECP for the agriculture sector and for peatland rewetting have been implemented as set out in the NECP. - There are likely possibilities to upscale NbS to deliver more on adaptation and other environmental objectives.
<p>LULUCF (Land Use, Land Use Change and Forestry (Regulation 2018/841)</p>	<p>Action under LULUCF must be reported as part of the NECP</p>	<ul style="list-style-type: none"> - Each MS has an individual binding target for removals (GHG reduction/sequestration) from the land sector (agriculture and forestry) - for NL it is to reduce from 5.1 to 0.44 MT CO2 eq 	<ul style="list-style-type: none"> - NbS actions for LULUCF include <ul style="list-style-type: none"> o addressing emissions from drained organic soils, and o carbon removals via afforestation and improved forest management 	<ul style="list-style-type: none"> - Assessment was made by EC/NL of the measures included in NL NECP that the LULUCF target would be overachieved by 2030. - This assessment, however, was based on NL implementing the measures on peatland/wetland emissions on agriculture land,

				<p>which are understood to not have been fully implemented.</p> <ul style="list-style-type: none"> - This means significant further action may be needed in the next 5 years to 2030 to meet the LULUCF target.
<p>Common Agricultural Policy CAP Strategic plan Regulation (EU) 2021/2115</p>	<p>CAP Strategic plans must be drawn up by each MS for the period covering Jan 2023- Dec 2027</p>	<ul style="list-style-type: none"> - CAP plans must address environmental and climate issues as part of the overall EU funding support that goes to farmers - MS define the specific standards for Good Agricultural and Environmental Condition (GAECs) to protect air, water, soil, nature and climate. Farmers receiving CAP payments must comply with these standards - MS must programme Eco-schemes (from 1st pillar fund) and Agri-environment-climate commitments to address env/climate issues (from 2nd pillar fund), these are voluntary for farmers to enter into. 	<ul style="list-style-type: none"> - The existing 'green architecture' of the CAP includes <ul style="list-style-type: none"> o GAECs o Eco-schemes o Agri-environment-commitments o Organic payments o Compensation payments for mandatory commitments (Natura/WFD) o Non-productive investments - All of which use NbS to address soil, water, biodiversity and climate objectives. - There are however many opportunities to enhance the design of these instruments to better address MS/regional/ecosystem specific issues. 	<p>The NL CAP plan includes</p> <ul style="list-style-type: none"> - a menu of ~25 eco-activities (e.g., buffer strips, protein crops, under-sowing, non-productive areas) that farmers can choose - An agri-environment scheme called ANLb –which again has a menu of options - cooperation instrument to form collectives to implement measures on a larger scale <p>An assessment of what the CAP plan has delivered in the current period, should be a starting point for considering how the CAP plan of the next period could be configured. NbS actors should be ready for public consultations on this.</p>

Annex 2 - EU Policies in development with expected legal effect relevant for NbS

EU Policy (date)	Planning document (timeline)	Focus: climate, water, biodiversity	Key provisions relevant for NbS	NL challenges and opportunities
Common Agriculture Policy strategic Plan under last period now under EC proposal would become part of National and Regional Partnership Plans	National and Regional Partnership Plans (including the CAP plan). To be adopted end 2027 for the period 2028-2035	Payments for farmers to support food security, competitiveness and environmental and climate actions	<p>There are a number of changes in the EC proposal⁴⁸ compared to the current period.</p> <ul style="list-style-type: none"> o 'farm stewardship' replaces conditionality and leaves MS more flexibility in defining conditions (for water, soil, climate, biodiversity protection) o new transition payment, up to €200,000, for farms shifting to more sustainable models. o removal of mandatory ring-fencing for NbS type measures (Pillar 1 (eco-schemes) and Pillar 2 (AECMs)). MS will no longer be required by EU law to allocate a fixed minimum share of CAP funds for climate/environment in these categories 	<ul style="list-style-type: none"> - NL together with like-minded countries could negotiate at council level to reinstate ring-fenced spending for agri-environment-climate actions (the most impactful NbS instrument). - The CAP provides a toolbox of NbS measures that can be used for implementing water, nature, climate obligations in the agricultural sector. - Early engagement and cross-sectoral working to fully exploit these opportunities is needed.

⁴⁸ https://agriculture.ec.europa.eu/media/news/future-cap-proposal-aims-protect-sustainability-and-resilience-farming-2025-10-24_en

			- The new CAP proposal gives significant flexibility to MS on what they use the CAP for. Its environmental ambition will depend on national decisions	
EU Initiative on Climate Resilience	Commission work programme for 2026 ⁴⁹ includes European integrated framework for climate resilience (non-legislative and legislative) Q4 2026	This new action is likely to build on the EU Climate Risk Assessment published in 2024	<ul style="list-style-type: none"> - The 2021 update of the EU Adaptation strategy included NbS as one of the 4 priorities for enhancing adaptation action - EC Guidelines on MS adaptation strategies and plans⁵⁰ also specifically addresses NbS. - It's therefore expected that this would provide further impetus for NbS in climate adaptation 	<ul style="list-style-type: none"> - NbS actors could engage directly with DG CLIMA to promote ideas for enhancing NbS in this framework. - NbS actors should be ready to feed into the evidence collection and public consultation processes for this new initiative – e.g. on the quantification of what NbS can deliver in terms of mitigating climate risks.

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⁴⁹ eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52025DC0870

⁵⁰ [Guidelines on MS adaptation strategies and plans.pdf](#)