



Mr Nicola Notaro  
Head of Unit  
European Commission  
Directorate-General for Environment  
Nature Protection ENV.D.3

Brussels/Tilburg, 30.03.2021

**RE: Draft technical note on criteria and guidance for protected areas designations - OECMs**

Dear Mr Notaro,

The European Landowners Organization (ELO) and Eurosité – the European Land Conservation Network welcome the explicit acknowledgement in the European Commission's draft TECHNICAL NOTE ON CRITERIA AND GUIDANCE FOR PROTECTED AREAS DESIGNATIONS (version 02.02.2021) that “other effective area-based conservation measures” (OECMs) can contribute to the target of the European Biodiversity Strategy to protect at least 30% of the land and sea in the EU by 2030 (“30x30”).

We believe that private land conservation in particular has an important role to play in reaching the targets of the EU Biodiversity Strategy. We would therefore like to underline the potential that OECMs have for private landowners willing to contribute voluntarily to the EU’s 30x30 target.

To strengthen this potential, we suggest the following changes to the text of the draft Technical Note, page 11:

"OECMs may therefore include areas **that meet the criteria as set out in Annex III of CBD Decision 14/8** (*insert as footnote: <https://www.cbd.int/doc/decisions/cop-14/cop-14-dec-08-en.pdf>*), **i.e. they** have some form of legal protection that is not related to the protection of habitats and species (e.g. areas designated for water protection, flood prevention areas, military areas with restricted access, fisheries restriction measures, offshore wind farms, underwater cables sites) but indirectly promote the conservation of biodiversity. If effective management of the biodiversity in the area is in place, conservation objectives and measures are in place as described above, and the area is covered by a national or international legal or administrative act or a **contractual arrangement achieving long-term conservation outcomes**, such areas may be counted towards the protected areas targets in the Strategy."

Yours sincerely,

Dr. Tilmann Disselhoff – President of Eurosité

Jurgen Tack - Scientific Director ELO