



## **Open letter – Joint position of the Conservation Landowners Coalition on the EC's draft for a EU Nature Restoration Regulation**

The Conservation Landowners Coalition (CLC) – an initiative of ELO and Eurosité - reaffirms its support to the objectives of the legislative proposal by the European Commission for a EU Nature Restoration Regulation (NRR).

Climate change is impacting European ecosystems to a degree we still do not fully understand, but important decisions have to be made today. In this light, we value the proposed efforts, in particular for areas with highest potential to remove and store carbon and to prevent and reduce the impact of natural disasters.

We are aware that, in face of the multiple crises, there is a temptation to prioritise short-term gains at the expense of sustainable solutions. A long-term approach is however of crucial importance to ensure that Europe's landscapes develop the resilience needed to cope with the increasingly regular extreme weather events that we will inevitably face.

Climate change and biodiversity loss pose unprecedented challenges. Reversing the damage done and adapting to future changes will require to look beyond the traditional approach of protection and restoration. Ecologic, social and economic sustainability can only be reached when we reconcile the provisioning of food, materials, energy and other ecosystem services with combating climate change and biodiversity loss.

The proposed Nature Restoration Regulation is a step in the right direction. However, it needs to ensure that national restoration plans pursuant Art. 11 are developed in close collaboration with landowners and other affected stakeholders, and that adequate tools and sufficient funding are available for their implementation.

Landowners and land managers will be most affected by the implementation of national restoration plans. We will only succeed in reaching the ambitious targets of the proposed regulation if the responsibility of each stakeholder is clear, understood and agreed on from the beginning. We need to build on previous discussions and learn from past mistakes. Even with a coherent and effective legal framework, this level of ambition will require an unprecedented mobilisation of resources. Finding innovative mechanisms seems more necessary than ever. That is why we regret the overall lack of focus on implementation and incentives in the draft NRR.

In particular, the absence of private land conservation tools is a missed chance. The European Commission has spent considerable resources on studying and confirming their effectiveness and their potential in area-based conservation and restoration in the EU. Various projects (LIFE L.I.F.E. LIFE ELCN, LIFE ENPLC) have provided crucial test cases and pilot approaches for biodiversity improvements and climate change mitigation through private land conservation. As autonomy and flexibility are fundamental values of landowners and influence their willingness to engage in area-based conservation, decision makers are well advised to include these cooperative and voluntary approaches in the nature restoration toolbox.

A set of tools has been identified as fit for this purpose. They are supported by both conservation organisations and landowners and allow flexible solutions for restoring nature on private land and ensuring the long-term impact of restoration measures.

- Conservation easements
- Conservation leases
- Conservation agreements
- Nature conservation labelling and certification schemes
- Privately protected areas/other effective area-based conservation measures (OECMs)
- Result-based payment schemes

These tools also represent options to channel funding from public and private initiatives to restoration by incentivising entrepreneurs to develop business models that contribute to the goals of this regulation.

To that end, we suggest the following three action points to be taken into account in the proposal for the NRR:

1. **Reference a set of area-based implementation tools**, among which the private land conservation tools listed above, in Art. 11 of the NRR as possible mechanisms for the implementation of national restoration plans.
2. **Elaborate on these tools in an annex to the NRR**, similar to Annex VII listing examples of conservation measures.
3. **Include detailed descriptions of the tools** foreseen for area-based restoration and long-term protection of restored land and related funding mechanisms **as obligatory content of national restoration plans** pursuant Art. 12 of the NRR.



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