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Feedback from: Bioenergia ry - the Bioenergy Association of Finland

Feedback reference

F1293223

Submitted on

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Submitted by

The Bioenergy Association of Finland

User type

Business association

Organisation

Bioenergia ry - the Bioenergy Association of Finland

Organisation size

Micro (1 to 9 employees)

Transparency register number174042620514-51 (<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=174042620514-51&locale=en>)**Country of origin**

Finland

Initiative[Protecting biodiversity: nature restoration targets under EU biodiversity strategy \(/info/law/better-regulation/have-your-say/initiatives/12596-Protecting-biodiversity-nature-restoration-targets-under-EU-biodiversity-strategy\)](/info/law/better-regulation/have-your-say/initiatives/12596-Protecting-biodiversity-nature-restoration-targets-under-EU-biodiversity-strategy)

The Bioenergy Association of Finland supports the aim of the EU to address biodiversity loss and the degradation of ecosystems.

The general objective of the proposed legislation is to restore degraded ecosystems, in particular those with the most potential to capture and store carbon and to prevent and reduce the impact of natural and man-made disasters. We would like to note in this context that the EU and its Member States have several instruments in place for managing carbon and greenhouse gas emission balance. Therefore, any restoration targets should fully focus on addressing and improving biodiversity, and not set any additional climate change related requirements for Member States. The greenhouse gas emission balance of the land-use, land-use change and forestry sector is already addressed through the LULUCF regulation, in which the Member States have discretion on and determine how to respond to the no-debit requirement.

The roadmap notes that effective and coordinated contributions by all Member States are necessary to achieve significant levels of biodiversity restoration in the EU. As a general principle, any binding restoration targets need to consider the current differences in percentage and quality of protected lands in different Member States. Restoration and protection both aim at the same objective and need to be looked at together. If any binding targets are set, the targets need to be clearly defined and comparable. It must be clear through which parameters an area is deemed "restored" and why (some of the losses in biodiversity are caused e.g. by climate change). Restoration would need to be as cost-effective as possible both at the EU and Member State level. As forest policy is Member States' competence, any restoration targets and restoration measures with regard to forests should be defined in Member States.

In order to offset the costs of biodiversity protection and restoration, economic incentives, such as compensation mechanisms, should be developed. The goal could be the overall improvement of the state of ecosystems and biodiversity - not only the no-net-loss of biodiversity.

The analysis and the toolbox available should make full use of and build on voluntary certification systems already in use and widely acknowledged by different interest groups. The established certification systems can greatly benefit work e.g. by their continuous criteria updating processes and dialogue with important stakeholders of biodiversity.

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