Discussion paper – Nature Restoration: how to get it done?

Implementing nature restoration: a challenge ahead

In August '24, the European Nature Restoration Law (NRL) has come into force. The adoption of this regulation was a difficult process, in which various stakeholders' and political vectors came into play. This struggle is not over, now that the Law has moved to the implementation stage. As EU Member States are preparing their restoration plans by summer 2026, all the issues that have been contentious before will come back in all Member States, at the same time, and in a variety of forms.

Therefore, a number of EEAC-councils decided to meet in Brussels on June 4th 2025, in order to discuss the implementation of the NRL. This paper has been prepared in anticipation of this meeting and serves a starting point for discussions. The 'final version' is slightly accommodated, on order to make it complementary with the meeting report.

Disclaimer: the views in this paper, derived from Finnish, Flemish and German advisory councils' work, do not necessarily represent those of the entire EEAC network.

Contents of this paper

Three advices from EEAC-members on the restoration challenge

A. Overview

Already three councils in the EEAC network have published their advice on the implementation of the NRL, between April 2024 and February 2025. As seen in table 1, the three papers differ in length, form and content.

Advice publications	Short description	Collaboration
SACHVERSTÄNDIGENRAAT FÜR UMWELTFRAGEN – SRU et al. *Nature restoration: Strengthening biodiversity and managing land sustainably* , April/August 2024	90 pages of advice highlighting the need for an effective restoration policy. assessing its potential impacts on land-uses and biomass production and laying out recommendations for the implementation of the nature restoration law in Germany. The advice focuses on the question how to secure sufficient land area for restoration projects.	the Scientific Advisory Board for Biodiversity and Genetic Resources (WBBGR), and the Scientific Advisory Board for Forest Politics (WBW)
MINARAAD et al, Implementation of the Nature Restoration Act, Brussel, November 2024	27 pages of advice as requested by the government. Recommendations for the process of drafting the Nature Restoration Plan as well as recommendations regarding the specific substantial provisions on the different types of ecosystems. This advice was produced at the request of the administrations that will be responsible for the implementation.	Flemish Socio-Economic Council, Spatial Planning Council and Agriculture council (resp. SERV, SARO, SALV)
KESTÄ VYYS PANEELI et al, Messages from scientific panels for the preparation of the National Restoration Plan, Helsinki, February 2025	20 pages of advice resulting from a scientific sparring session related to the preparation of the National Restoration Plan, the aim of which is to gather researchers' thoughts behind the planning work. The process was initiated by the Ministry of the Environment, which expressed the need for information.	the Finnish Nature Panel, the Climate Panel and the Forest Bioeconomy Science Panel

Table 1 – a short description of three advices on the implementation of nature restoration

The MINARAAD, a stakeholder council, gave an advice regarding the implementation of the NRL, referencing the different provisions and suggesting detailed action-points for them. The SRU, a scientific council, developed their advice before the NRL was adopted. It is a solid and extensive scientific exploration on the conditions that frame restoration in Germany and ways to improve it. The FESDP advice was developed as a conference results paper, and shares the academic background with the SRU paper and the practical references to commendable policies with the MINARAAD paper.

B. Underlying message: convince stakeholders to engage

Although their perspectives and method differ, the three councils have similar recommendations. Underlying these recommendations, we found a more general message, i.e. about *the need to convince stakeholders to engage*. All councils agree that the efforts of Member-States on designing the perfect nature restoration plan or on implementing such plan will not work without the buy-in from stakeholders:

– SRU et al. see nature restoration as a societal task with far-reaching economic implications, affecting nature conservationists, but, more importantly, all the land-using sectors, in addition to urban and regional planning, in particular agriculture and forest management. The SRU stresses that restoration measures are urgently needed to promote the resilience and adaptability of ecosystems and to create synergies with climate change mitigation and adaptation. Agriculture and forest management have considerable responsibility for the recovery of degraded ecosystems, given their large share of land use – but they have a considerable interest as well. Restoration on a broad scale is therefore only possible if large parts of society, especially landowners and users, are convinced of the sense of this change. If conflicting goals and synergies are considered in time and moderated at an early stage, politics and society can jointly develop proposals for dealing with them." (SRU, §8, §29, §72).

– The FEPSD et al. consider that the realization of restoration obligations will probably not gain fully the approval of all parties concerned. 'Compensating justice' understands that concrete people can have very different roles in relation to restoration (for example, based on their professional activity, their role in the landscape, their traditional or recreational activities etc). The principle of 'compensating justice' can help to address the challenge of attaining fair restoration policies and measures. (FEPSD et al., chapter 1.5.).

– Minaraad et al. point to the importance of understanding and considering the complete agro-food-system. Clarity is needed about the expected positive and negative effects on food production in Flanders in terms of available space, yield, soil and water system quality, biodiversity, climate resilience, etc., and about the concrete development and production opportunities for farmers and horticulturists. (Minaraad et al., §6).

Summary for discussion, leading to a position paper

There is an urgent need for a well-structured, long-term restoration policy, reinforcing ecosystems and enhancing their resilience and climate mitigation and adaptation potential. Nature restoration is therefore seen as a societal task with significant economic implications, impacting as well as benefiting various sectors, especially agriculture and forest management.

Successful large-scale restoration efforts will require the involvement and support of society, particularly landowners and -users. Not all stakeholders may fully approve of restoration obligations. The principle of "compensating justice", considering the diverse roles people play in relation to ecosystems and to the restoration thereof, will be crucial for developing effective, fair and publicly accepted policies and measures.

While introducing and managing nature restoration efforts, it is important to consider the entire value chains behind agriculture and forestry. It is essential to clarify the expected impacts on food and wood production, including effects on space, yield, soil and water quality, biodiversity, and climate resilience, as well as the development opportunities for farmers, horticulturists and forest owners.

Extra elements to consider on June 4th

Last, but not least, citizens must not be overlooked as stakeholders. In the countryside, citizens will bear the burden but will also harvest the advantages of restoring ecosystems and their services. In cities, citizens have a lot to gain when the cities they live in are green and are surrounded by accessible green areas. In both situations, citizens will be relevant as partners, through their involvement in the citizen-science-programs that will be needed.

10 potential solutions – 10 topics for discussion

A. "Getting things mainstreamed"

1. Providing for a genuine participatory process

***See NRL, article 14, §20**: "Member States shall ensure that the preparation of the restoration plan is open, transparent, inclusive and effective and that the public, including all relevant stakeholders, is given early and effective opportunities to participate in its preparation.".*

***See NRL, article 15, §3, (v)**: "Each Member State shall include [...] a summary of the process for preparing [...] the National Restoration Plan, including information on public participation and of how the needs of local communities and stakeholders have been considered;"*

- SRU et al. point to the potential for conflicts over the use of the land, which exists both quantitatively, i.e. regarding how much land is available for which use, and qualitatively, i.e. regarding the intensity of use. Nature restoration measures can exacerbate these conflicts but can also lead to extra synergies. The inclusion of all relevant actors in the planning of a nature restoration project – with their wishes and concerns, interests, possibilities of influence and intentions – can prevent potential conflicts and create possibilities for suitable restoration measures. Nature restoration can only be successful if communication, participation and the balancing of interests are considered from the outset. Participation formats could include round tables, workshops or information events and one-on-one meetings with stakeholders. In addition, in the planning or implementation phase of a restoration project, cooperation with local actors and groups makes sense. (SRU et al., §35, §§93-95).

- FEPSD et al. believe that genuine participation is essential. Restoration measures, even if well-founded, might not work if affected parties are not involved in the process for deciding on these measures. Citizens must have the opportunity to participate in decision-making that affects them. On the other hand, participation does not have to lead to full support: research shows that a good participatory process can also help accept 'divisions' that are perceived as unfair. There is a need to coordinate participation at different scales, ensuring regional involvement of stakeholders, residents and landowners in the design of actions at the local level. (FEPSD et al., Chapter 1.5)

- MINARAAD et al. ask for the publication of a process-note that would clarify the approach and timing for the preparation of the restoration plan, as well as the relationships with the SEA, the SCBA (societal cost-benefit analysis) and the public consultations. They ask to be heard by the Government well before the final approval of the first draft plan (in the context of public consultation of the EIA procedure) and then well before the submission of the final plan to the European Commission. (MINARAAD et al., §14, §16).

Summary for discussion, leading to a position paper

As the planning and implementation of nature restoration takes place, it is important to consider the potentiality for conflicts: nature restoration will change land use patterns. Therefore, genuine participation is essential, as restoration measures are bound to fail without stakeholder involvement. Economic actors and citizens must be well-informed in time, thereby creating opportunities to participate in decision-making.

In relation to the national planning process, a public process note will be needed to clarify the approach and timing for the making of the restoration plan, including its relationship with the EIA/SEA, SCBA, and public consultations. Advisory councils should be consulted at crucial phases of the planning process.

Coordinated participation is even more relevant in relation to regional or local restoration initiatives, involving regional stakeholders, residents, and landowners. Including all relevant actors in these planning processes can prevent conflicts and enable concrete, suitable restoration measures. Balancing interests from the outset, by using formats like round tables, workshops, and one-on-one meetings, will enhance cooperation and benefit the planning and implementation processes.

Extra elements to consider on June 4th

- How to find the right balance between including not only relevant stakeholders but also citizens and making sure the participatory process is effective, efficient and leads to useful results?
- How to communicate the value of nature, biodiversity and healthy ecosystems to the broader public that has no prior knowledge?
- How to communicate with opponents of this way of thinking?
- How to guarantee participation at all relevant levels: national, regional and/or local participation? Would it be a good idea to install permanent participatory bodies, such as local nature councils, in order to promote local action and engage citizens, local authorities and stakeholders?

2. Assessing and managing costs and benefits

***See NRL, consideration n° 14**: "[...] Biodiverse ecosystems [...] deliver, if in good condition, a range of essential ecosystem services, and the benefits of restoring degraded ecosystems to good condition in all land and sea areas far outweigh the costs of restoration. [...]".*

***See NRL, consideration n° 65**: "[...] In order to avoid unintended consequences, Member States should also consider the foreseeable socio-economic impacts and estimated benefits of the implementation of the restoration measures. [...]".*

***See NRL, article 14, §16, (b)**: "When preparing their National Restoration Plans, Member States [...] shall aim to optimise the ecological, economic and social functions of ecosystems as well as their contribution to the sustainable development of the relevant regions and communities".*

***See NRL, article 15, §3, (s)**: "Each Member State shall include the following elements in the National Restoration Plan [...] the foreseeable socio-economic impacts and estimated benefits of the implementation of the restoration measures [...];".*

– SRU et al. state that an economic assessment of restoration measures must not be restricted to the direct economic consequences. Relevant cost and benefit categories go beyond direct expected expenditures and incomes: it is about investing in regulative ecosystem services – and this relevance will increase as climate change progresses. In addition, the 'option value' of future uses must be considered and the opportunity costs must also be taken into account. Moreover, the 'legacy value' expresses the social desire to pass on a heritage to future generations. Finally, 'existential value' refers to the willingness of humans to preserve certain ecosystems or species as such. (SRU et al, §§2-25). See the following table:

Costs	**Gains**
Investment in nature restoration (up-front costs) – Project costs: machines, material, labor, management – Land acquisitions or expropriations – Easements	**Ecosystem 'regulating' services – indirect use values** – Flood protection – Water purification – Pollination – CO2 storage capacity – Etc. **Non-Use Values** – 'legacy' and 'existence' values of species, ecosystems or landscapes
Opportunity Costs – Restricted licences to operate (stricter permitting policies) in relation to agricultural, forestry, industry, building or infrastructure projects – Lost revenues in relation to agricultural and/or forestry practices	**Option Values (potential future usage)** Preserved opportunities for – Agriculture – Forestry – Tourism – Etc.
Direct operating costs – Maintenance of ecosystems – Monitoring of the restored state – Surveillance and enforcement	**Direct use values** – Clean drinking water – Diversified agricultural produce – Diversified forest harvests – Cooling effect in cities – Eco-tourism

Table 2. Elements of an enriched cost-benefit analysis, based on the SRU-advice

– SRU et al. add that the opportunity costs of restoration should not be considered statically. It seems more sensible to carry out an analysis of expected future developments. For example, future agricultural yields in the case of production that is not adapted to climate change (without restoration) should be compared with the future yields in case of partial restoration (i.e. higher resilience)." (SRU et al., §26).

– FEPSD et al. plead likewise for a comprehensive impact assessment, examining the measures needed to fulfil the objectives of the NRL. It is important to look at the fairness of the measures. In summary, a list of four criteria should be taken into account when

considering alternative measures: (1) the impact on nature, (2) rational use of resources, (3) the distribution of costs and opportunities to benefit from ecosystem services, and (4) the long-term effects of restoration for different sectors and citizens. (FEPSD et al., chapter 1.3. and chapter 2.0.).

– Also, MINARAAD et al. consider scientific substantiation of the foreseeable socio-economic effects and the estimated benefits as crucial. Additionally, the expected social benefits should be mapped out (in terms of water safety, water quality, air quality, human health, biodiversity, etc.) and all elements should be brought together in a broader 'societal cost-benefit analysis' (SCBA). All this needs to be looked at both in the short and long term. Within this framework, specific research is needed on the opportunities and challenges for agriculture and the food system. (MINARAAD et al, §5-6).

Summary for discussion, leading to a position paper

The choice between alternative measures should be guided by four criteria: impact on nature, rational resource use, cost distribution and benefits from ecosystem services, and long-term effects on sectors and citizens. Therefore, a comprehensive impact assessment is needed to meet NRL objectives, with a view to coming to a fair distribution of benefits and costs.

Scientific substantiation of expected socio-economic effects (changed room for maneuver in land use opportunities, impacted use values, yields and/or value chains) and expected social benefits (water safety, quality, air quality, health, biodiversity) should be included in a broader societal cost-benefit analysis (SCBA). Both short and long-term perspectives are necessary, with specific research on agriculture, food system and forestry opportunities and challenges. Opportunity costs of restoration should be analyzed considering future developments.

Extra elements to consider on June 4th

– How to develop a robust and uniform European methodology for assessing benefits and costs, while considering and recognizing the specific properties of member states and/or or regions?

– How to construct a socio-economic impact/benefits-analysis such as to inform policy makers about the priority policy-areas where the effectiveness and efficiency of efforts can be maximized.

– How to weigh benefits that relate to the long term and to resilience against costs that relate to individual interests and short term implementation problems?

3. Communicating respectfully

***See NRL, consideration n° 17**: "[The Climate Law] requires Member States to [...] promote ecosystem-based adaptation and nature-based solutions. Nature-based solutions are solutions that are inspired and supported by nature, that are cost-effective, and that simultaneously provide environmental, social and economic benefits and help build resilience".*

***See NRL, consideration n° 83**: "Member States [...] should put in place the necessary measures to engage local and regional authorities, landowners and land users and their associations, civil society organizations, business community, research and education communities, farmers,*

fishers, foresters, investors and other relevant stakeholders and the general public, in all phases of the preparation, review and implementation of the National Restoration Plans".

- For FEPSD et al. a communication strategy should be developed as part of the restoration plan. Communication should be targeted so that different groups are supported in identifying the costs and benefits of restoration. (FEPSD et al., chapter 1.5)

- And also MINARAAD et al. ask for a sound communication strategy to be developed tailored to the target groups involved and the public. This communication strategy must focus strongly on the social benefits of nature restoration, make the provision of ecosystem services tangible and clarify types of measures. Extra attention and efforts are needed specifically for the agricultural sector, to depolarise the situation and restore trust. A more specific suggestion is to provide for a monitoring system in which all actors can participate this can motivate relevant partners to communicate about and to contribute to restoration measures. (MINARAAD et al., §17, §32)

- On the contents of communication efforts, SRU et al. stress that intensive and targeted communication on the benefits of nature restoration is needed. Land-owners and users of agricultural land, as well as those who decide on private forests, must be won over. It should be recognized that these actors play a central role in supplying society with food and feed, energy and/or industrial crops, residues and by-products such as manure or straw as well as wood. At the same time, climate change is altering the conditions in which farmers and foresters operate, such as temperatures as well as precipitation. Investing in restoration can help to reduce yield risks in the long term. (SRU et al., §18, §34, §45, §47, §92).

- For FEPSD et al., it is important to clarify that the costs of restoration are generally concentrated in the initial phase, while the benefits are spread over the long term. Besides that, it is important to try and communicate based on experiential information, showing that the restoration efforts are also about bringing back to communities the natural values that people are familiar with and value. (FEPSD et al., chapter 1.5)

- More specifically, MINARAAD et al. recommend that the scientific basis of the National Restoration Plan be made public: for the follow-up process to be successful, it is important that all actors recognise and support this scientific basis. (MINARAAD, §4)

Summary for discussion, leading to a position paper

A communication strategy should be part of the restoration plan and should be tailored to the relevant target groups as well as towards the public. This strategy should clarify the ecosystem services that are being restored, explain the measures involved, and highlight the upfront character of restoration costs as well as the long term environmental, social and economic benefits of nature restoration. Communicating through experiential information can help communities appreciate the natural values being restored. Special efforts are needed for the agricultural and forestry sector to reduce polarization and build trust. The scientific basis of the National Restoration Plan should be made public to ensure support from all actors.

Extra elements to consider on June 4th

- How to convey the narrative that nature restoration and maintenance are the way to guarantee prosperity, competitiveness, security in a broad sense (food, energy, etc.), and the well-being and health of people?

- How to 'translate' the scientific concept of 'good condition' into something the broader public can understand? Would it be relevant to use concrete and quantified cases about the return of investment in nature restoration for tourism, water availability and/or other 'services'?

- What should a communication strategy for conveying a scientific message look like? Which elements should be included in the narratives for the wide array of sectors that have stakes in nature and in nature restoration?

B. "Getting things streamlined"

4. Developing a plan for the long term

***See NRL, art. 1, §2**: "This Regulation establishes a framework within which Member States shall put in place effective and area-based restoration measures with the aim to jointly cover, as a Union target, [...] at least 20 % of land areas and at least 20 % of sea areas by 2030, and all ecosystems in need of restoration by 2050.".*

***See NRL, art. 15, §1**: "The National Restoration Plan shall cover the period up to 2050, [...]".*

***NRL, article 15, §2**: "By way of derogation from paragraph 1 [...], the National Restoration Plan to be submitted [...] may, with regard to the period from 1 July 2032, [...] be limited to a strategic overview [...]. [etc.]".*

- SRU et al. see the restoration of ecosystems as a generational task. The NRL is based on a time horizon until 2050. Concrete successes will often take even more time, depending on the objectives and form of restoration. These considerable implementation periods require a societal and legal framework that enables a long-term restoration policy and creates the necessary planning security. However, according to the NRL in the first two plans to be submitted (2026 and 2032 respectively), detailed explanations are only necessary for the immediate future. (SRU, §72, §98-99).

- However, MINARAAD et al. ask that this inclusion of long-term goals should not be limited to a strategic overview, but that clarity be created about the concrete long-term plans for nature restoration policy. (MINARAAD et al., §12).

- FEPSD et al. point to the importance of taking the permanent positive impact of measures into account, when selecting measures (FEPSD et al., chapter 2.0.).

Summary for discussion, leading to a position paper

Ecosystem restoration will be a generational task, which is why NRL-planning typically has a time-horizon until 2050. Successes may even take longer, depending on the types of ecosystems being restored and their objectives. It's important to consider the permanent positive impacts of measures when selecting them.

To guarantee restoration activities over the long term, a robust societal and legal framework will be required. The first two planning periods (2026 and 2032) focus on the immediate future and only oblige to a general view on the long term, leaving it to the Member States to decide how specific they want to be about the long term.

Extra elements to consider on June 4th

- How to enable that restoration does not stop in 2050, i.e. how to look beyond 2050?
- How to guarantee that governments do not consider reference levels for the 'good status' (e.g. the percentage of land to be restored) as end-stations, beyond which no nature should be protected or restored?
- How to ensure that the restored ecosystems and species are maintained in a 'good status' in the long run?

5. *Using the best scientific knowledge*

***See NRL, consideration n° 65**: "[...] It is important that Member States prepare detailed National Restoration Plans based on the best available scientific evidence. ...".*

***See NRL, consideration n° 83**: "Member States should [...] foster dialogue and the diffusion of science-based information about biodiversity and the benefits of restoration.".*

***See NRL, article 14, §1**: "Member States shall [...] carry out the preparatory monitoring and research needed to identify the restoration measures that are necessary to meet the restoration targets and fulfil the obligations [etc.].".*

- MINARAAD et al. ask for a scientifically substantiated 'budget' for the ecological goals to be achieved. Scientific institutions must be given sufficient time to arrive at a solid foundation for the Nature Restoration Plan. Where relevant, multidisciplinary work should be carried out, i.e. with the involvement of other experts. It is important to list all uncertainties, open questions and knowledge gaps. (MINARAAD, §4).
- FEPSD et al recommend allocating sufficient resources to research, to better understand which measures are most effective in which habitats (e.g. conservation versus active restoration). Resources for monitoring must be secured to understand the effects of different measures (to be able to change them if necessary), and to better manage the potential risks associated with restoration. It would be good to consider redirecting the themes of existing strategic research to support the nature objectives of the restoration plan and the monitoring of their implementation. (FEPSD et al., chapter 1.3.).
- SRU et al. stress that nature restoration measures should be accompanied by a monitoring scheme and adjusted if the results are unsatisfactory or undesirable developments occur to ensure long-term effectiveness. Programs and structures for monitoring as well as reporting obligations should be bundled.

Summary for discussion, leading to a position paper

Scientific institutions will need the means and enough time to establish a solid foundation for the Nature Restoration Plan, especially when multidisciplinary work is needed, leading to a

scientifically substantiated 'budget' for goals and measures. It would be good to consider redirecting the themes of existing strategic research to support the nature objectives of the restoration plan and the monitoring of their implementation. When creating this scientific basis, it's important to list uncertainties, open questions, and knowledge gaps.

Restoration measures should include a robust monitoring scheme, to be adjusted if the results of the measures prove to be unsatisfactory. In that sense, monitoring is crucial to ensuring long-term effectiveness. Existing monitoring programs and reporting obligations should be consolidated and bundled, where possible. Monitoring resources must be secured to understand the effects of measures and manage potential risks.

Extra elements to consider on June 4th

- What are the gaps and imprecise definitions that are still present in the NRL, how could science fill in these gaps, and what guidance is there to be expected from the Commission?
- What role would be expected from science in exploring and clarifying the feasibility and rationality of restoration policies?
- How could science help and provide the planning authorities with meaningful interpretations of the rapidly advancing global changes and its consequences for nature restoration?
- How could science help to construct a sensible interpretation of the 'precautionary principle' in the context of ecosystem management and nature restoration?
- How would a useful science-policy-action interface (knowledge transfer platform) best be envisioned?
- What role could be expected of existing science-based advisory councils in mobilizing and/or concentrating scientific efforts while preparing or implementing nature restoration measures?

6. *Managing/overcoming silos*

***See NRL, consideration n° 11**: "[...] synergies with other Union and international targets, in particular environmental or climate policy targets, are to be sought."*.

***See NRL, consideration n° 66**: "[...] Member States should take into account [...]: the conservation measures established for Natura 2000 sites [...]; measures for achieving good ecological and chemical status of water bodies [...]; marine strategies for achieving good environmental status [...]; national air pollution control programmes prepared [...]; [etc.]"*.

***See NRL, consideration n° 68**: "Member States should coordinate the development of National Restoration Plans with the mapping of areas that are required in order to meet at least their national contribution towards the 2030 renewable energy target and, where relevant, with the designation of the renewable's acceleration areas and dedicated grid areas. [...]"*.

***See NRL, article 14, §9**: (identify synergies with climate policies), **NRL, article 14, §10** (identify synergies with agriculture and forestry), **NRL, article 14, §13** (establish relation with areas for the 2030 renewable energy target, **NRL, article 14, §14** (synergies with Habitat Directive, WFD, air*

pollution control)v, ***NRL, article 15, §3, (r)*** *(include co-benefits for climate change mitigation etc.),* ***NRL, article 15, §5*** *(include overview of the interplay with national CAP strategic plan).*

Managing the relationship between silo's implies good governance:

- According to MINARAAD et al., a governance structure must be designed in order to foster cooperation and involvement of the relevant public institutions, ensuring that the relevant research institutions, departments and agencies would actively be involved in the elaboration of strategic choices. (MINARAAD et al, §15).

- FEPSD et al. recommend that, as part of the preparation of the plan, problems arising from the silo nature of government should be addressed. Effective implementation needs to be prepared by carrying out a joint review of the policy objectives, laws, regulations and instruments of different administrative branches. In the implementation phase, a cooperative model is needed that brings different administrative sectors together, steering operations consistently, based on a shared vision on the objectives of the NRL. To build a shared, long-lasting vision, a group of experts from different administrative branches should be invited together with representatives of parliamentary groups. (FEPSD et al., chapter 1.2.).

- Furthermore, the SRU highlights that nature restoration in the EU must not result in leakage effects through increased imports of non-sustainably produced agricultural and forestry products. Avoiding such unintended negative effects requires action across several sectors. For instance, reducing the consumption of biofuels and the share of animal-based products in human diets would free up more cropland for alternative uses such as food (rather than feed) production, carbon storage and nature restoration. (SRU et al., §76)

Summary for discussion, leading to a position paper – part 1, "relationship between silos"

To transcend the silo nature of governance, structures should be designed and promoted to foster cooperation among public institutions on nature restoration, involving research institutions, departments, and agencies. Effective implementation of nature restoration measures would require, across administrative branches, a joint review of policy objectives, laws, regulations, and instruments with impact on ecosystems. A cooperative model is needed in the implementation phase as well, to unite different sectors under a shared vision for the NRL.

When considering the relationships with other policy-silo's, one should not overlook external effects that could be of crucial importance for the interests that are being served by these silos. To be avoided are unintended negative effects of nature restoration efforts, such as compensation for diminished yields within Europe with increased imports of non-sustainably produced agricultural and forestry products from outside Europe.

Extra elements to consider on June 4th

- How to transform and reshape existing structures based on silos? Is it best to 'integrate' policy fields, or is it better to 'harmonize' policy fields? In other words: is it better to redefine hierarchies, or is it better to introduce coordination task forces?

- How to combine the challenge of managing relations between silos with the 'multi-level challenge', i.e. of managing the relations between the EU-level, Member-States, states regions with nature policy competences, as well as local authorities.

Existing policies can be a fruitful starting point for synergies:

- MINARAAD et al. agree that the potential synergies and opportunities for linking with other policy areas should be properly identified, based on their potential for the envisioned ecosystem services. Restoration measures that link these opportunities should be given priority. The starting point should always be an evaluation: what is already existing, and what does it yield in practice? Are the current measures of the different policy fields satisfactory in terms of their effects on nature? What adjustments are needed? Also, within the nature and forestry policy fields, further integration and rationalization of instruments is needed, to bring better coherence in their application. (MINARAAD et al., §5, §26, §28)

- FEPSD point to the fact that Finland has many programs and strategies in relation to climate policies or land management, which already enjoy broad social acceptance and whose objectives and measures are in fact congruent with the NRL: by strengthening and fine-tuning these existing programs, the implementation of the NRL could begin immediately and even before the National Restoration Plan is completed. (FEPSD et al., chapter 1.2)

- Also, SRU et al. note that the achievement of the NRL's objectives will depend heavily on other European legislation, policies and their implementation that affect the environment and the use of land and water, such as the Water Framework Directive and the EU's Common Agricultural Policy. The objectives and contents of the NRL also partly overlap with existing plans, strategies, programmes and legal requirements at the national and subnational levels. The National Restoration Plan offers the opportunity to systematically advance the implementation of these existing projects and guidelines. (SRU et al., §100)

Summary for discussion, leading to a position paper – part 2, "fostering synergies"

The NRL has many linkages with other European legislation and policies, such as the Water Framework Directive, the EU's Common Agricultural Policy and Climate policies. The implementation of the NRL will have analogous linkages with existing national legislation, policies and programs. At the local level, NRL-projects will overlap with existing plans, which offers chances to advance these projects.

At all levels, potential synergies with other policy areas should be identified, building on the already existing support for these policies, and prioritizing the synergies that have potential for enhancing prioritized ecosystem services.

Extra elements to consider on June 4th

- How to redefine nature restoration initiatives, such that they can be fit into the logic of other policy fields? How to identify synergies between policies?

- How to better coordinate different planning processes (e.g. water, climate, farming, forestry, …)?

- Or should planning processes of other sectors not be changed in any case, because of rapidly advancing global changes, which would necessitate new approaches to land use planning?

C. "Getting things financed"

7. Providing for European funding

***See NRL, consideration n° 78**: "Regarding Union funding, expenditure under the Union budget and Union financing programmes [...] contributes to biodiversity objectives with the ambition to dedicate 7,5 % in 2024, and 10 % in 2026 and in 2027 of annual spending under the multiannual financial framework for the years 2021 to 2027 laid down in [...] the 'MFF 2021-2027') [...]. [...].".*

***See NRL, consideration n° 81**: "To ensure the implementation of this Regulation, adequate private and public investments for nature restoration measures are essential. Therefore, the Commission should [...] present a report with an analysis identifying any gaps [...].".*

***See NRL, article 21, §7**: "By 19 August 2025, the Commission shall [...] submit a report [...] containing: (a) an overview of financial resources available at Union level for the purpose of implementing this Regulation; (b) an assessment of the funding needs to implement Articles 4 to 13 [...]; (c) an analysis to identify any funding gaps in the implementation of the obligations set out in this Regulation; (d) where appropriate, proposals for adequate measures, including financial measures [...], such as the establishment of dedicated funding, [...].".*

- MINARAAD et al. states that, in the context of the discussion on the European Multiannual Financial Framework, Flanders/Belgium should urge for additional resources. If necessary, a specific EU fund should be introduced for nature protection and restoration, to support all land managers in restoring and managing natural habitats at landscape level. In any case, there is a need for maximum utilization of available European funds and, in that context, to consider the findings of the Commission's report when drafting the restoration plan. (MINARAAD et al., §20-21).

- SRU et al. suggest that the allocation of funds from the EU level to the (sub)national level should take nature conservation efforts into account: in particular, the European Regional Development Fund or a new EU Nature Conservation Fund would be suitable for this. (SRU et al., §157). It is also conceivable that natural climate protection measures could be financed via the existing emissions trading system. Moreover, CAP conditionalities should be adjusted, so as they stronger contribute to a more environmentally friendly land management.

Summary for discussion, leading to a position paper

Member states should advocate for additional resources in the European Multiannual Financial Framework to support land managers in restoration efforts, including, if other funds do not allow for these resources, a specific EU fund for nature protection and restoration.

Maximum utilization of European funds is essential. Fund allocation should reflect nature conservation efforts, for example within the European Regional Development Fund. Financing natural climate protection measures based on the ETS is also conceivable. CAP conditionalities should be adjusted to better support environmentally friendly land management.

Extra elements to consider on June 4th

- Should not the new European economic and geopolitical context be reflected in the urgency of achieving the objectives set by the NRL? … i.e. nature restoration is essential to guarantee prosperity, competitiveness, security, and the well-being and health of all Europeans.

- How to create synergetic funding from other sectors (climate, agriculture, water, health) towards goals and projects that incorporate biodiversity and nature-based solutions? … e.g. climate funding towards LULUCF-actions that contribute to nature restoration.

- Under which conditions is a specific, dedicated EU-fund advisable?

8. *Managing non-deterioration and harmful subsidies*

***See NRL, consideration n° 37**: "It is important that […] Member States put in place measures which aim to ensure that once they have reached good condition, those habitat types do not significantly deteriorate, so as not to jeopardise the long-term maintenance or achievement of good condition. […] It is appropriate to ensure that Member States retain the possibility, in the absence of alternatives, to apply the non-deterioration requirement at the level of each biogeographical region […]. Such possibility should be allowed under certain conditions, including that compensatory measures are taken for each significant deterioration occurrence.".*

***See NRL, article 4, §§ 11-13** for the non-deterioration mechanism and requirements.*

***See NRL, consideration n° 85**: "[…] Member States are to phase out environmentally harmful subsidies […], making the best use of market-based instruments and green budgeting and financing tools, […], and supporting businesses and other stakeholders in developing standardised natural capital accounting practices.".*

***See NRL, article 15, §3, (v)**: inclusion of an indication of the subsidies which negatively affect meeting of the targets and the fulfilment of the obligations set out in this Regulation."*

The non-deterioration principle leads to a number of comments:

- SRU et al. recommend to secure the long-term success of nature restoration measures through a number of policies: (*) in protected areas, specific management requirements may need to be adjusted, e.g. with regard to the application of plant protection products; (*) permitting policies and immission control laws provide the option to steer construction projects and thereby spare areas from new developments in which ecosystems have been restored; (*) codes of good professional practice are meant to address overarching aspects, but should be more specific and have a more binding character in order to be effective. The CAP has increasingly linked income instruments to technical requirements for land management, in a way that is functionally similar to good professional practice; however, these conditionalities should be more strongly focused on contributions to restoration. Success of the restoration measures should be secured in the long term. The state should prevent land from being used in a way that prevents or significantly impedes the restoration of nature. Restoration success in the long term can be guaranteed through contractual nature conservation, the designation of protected areas and safeguarding planning instruments. (SRU et al. §§ 160-169).

- FEPSD et al. suggest implementing the non-deterioration-principle by a 'degrader-pays-principle': obliging operators to avoid harm in accordance with a mitigation hierarchy (i.e. natural hazards are primarily avoided, secondarily mitigated and, ultimately, unavoidable

harm is compensated). This would mean directing those who cause harm to nature to pay directly the costs of repairing this harm or to generate compensation via a 'the natural value market', channelling these funds into nature conservation and restoration. The enactment of a mandatory ecological compensation as part of ensuring non-deterioration should not only happen at Member-State level: Finland should raise the issue at EU level so that legislation is implemented uniformly in Member States. (FEPSD et al., chapter 1.1.).

– Minaraad et al. ask to study the consequences of the non-deterioration principle. What are the consequences for the granting of permits? There is an even greater need for clarification because in the Flemish Region there are already various protection mechanisms in place, i.e. the 'nature test', which in certain situations obliges the permit issuer to assess a permit application for avoidable damage to nature (Minaraad et al., §25).

Summary for discussion, leading to a position paper, part 1, "non-deterioration"

To realize 'non-deterioration', integration of conservancy and restorative practices into agricultural and forest management practices is necessary, with specific requirements for fertilizers and plant protection in protected areas, relevant permitting policies, and more binding codes of good professional practice. CAP conditionalities should focus more on restoration contributions as well.

Long-term restoration success requires preventing land use that would impede or reverse nature restoration, which should be guaranteed through contractual conservation, protected areas, and planning instruments. Therefore, a 'degrader-pays-principle' should be considered, making those who harm nature pay for repairs or compensation – at the same time, Member States should advocate for a uniformized ecological compensation legislation at the EU level.

Notwithstanding the need for non-deterioration, the impacts of this principle for the granting of building and/or exploitation permits need to be clarified. Moreover, in every Member State there will exist already several nature protection measures – i.e. aiming at non-deterioration. The relationship between these existing regulations and the newer non-deterioration policy should be clarified and simplified.

Extra elements to consider on June 4th

– How will the permitting policy evolve with respect to the non-deterioration principle?

– How to avoid ending up with a "the payer-pollutes-principle", i.e. with only 'compensation' measures, rather than 'restoration' measures?

– How to introduce an effective mitigation hierarchy, thereby avoiding damage to natural values and ecosystems in the first place, and considering compensatory measures as the last resort?

The phase-out of environmental harmful subsidies leads to some comments as well:

– FEPSD et al. propose to take forward the reduction of environmentally harmful subsidies and to redirect the revenues thereof towards activities that support biodiversity. Especially, the use of biodiversity-promoting forest management methods could be incentivized more strongly by redirecting the funds of environmentally harmful subsidies towards actions that

are positive for biodiversity. Moreover, a 'nature nuisance fee' could be imposed on all activities that weaken the state of nature. (FEPSD et al., chapter 1.2. and 2.3.)

- MINARAAD et al. expect that the model for the restoration plans, which the European Commission by end '24, would be accompanied by a clarification of how this provision on environmentally harmful subsidies is to be put into practice. (MINARAAD et al. §23).

- SRU et al. point out that the financial resources should be made available by reducing climate-damaging subsidies (§ 155).

Summary for discussion, leading to a position paper, part 2, "harmful subsidies"

Efforts should be made to reduce environmentally harmful (and/or climate-damaging) subsidies, redirecting those funds towards biodiversity-supporting activities. Biodiversity-promoting Forest management methods could be incentivized by reallocating these funds. Moreover, a 'nature nuisance fee' could be imposed on activities that harm nature.

This doesn't preclude that the identification and reduction of those 'harmful subsidies' should be done in a methodological sound and fair way, thereby creating and/or maintaining a level playing field. The manual of the Commission should be helpful for this.

Extra elements to consider on June 4th

- How to bring together the available scientific literature and synthesize the discussion on 'harmful subsidies', to make use of a meaningful and useful concept?

- How to accelerate the phasing out of these subsidies?

- How to redirect this funding to nature restoration activities, e.g. how to make best use of market-based instruments and green budgeting and financing tools, ...

9. Providing public finance and capacity-building

***See NRL, consideration n° 78**: "Member States should therefore integrate in their national budgets expenditure for biodiversity objectives, including in relation to opportunity and transition costs resulting from the implementation of the National Restoration Plans, and reflect how Union funding is used."*

***See NRL, article 15, §3, (u)**: "Each Member State shall include [...] the estimated financing needs for the implementation of the restoration measures, which shall include a description of the support to stakeholders affected by restoration measures [...], and the means of intended financing, public or private, including financing or co-financing with Union funding instruments;"*

- MINARAAD et al. insist on structural financing that provides long-term security for all the actors involved, both in terms of investment and support measures. They also point to the need to provide sufficient manpower to coordinate and effectively implement the implementation. (MINARAAD et al, §5, §§18-19).

- SRU et al. state that sufficient funding must be ensured by the governments, as the implementation of the NRL is their remit. Financial resources should be redistributed in favour of nature restoration. As restoration tasks and costs are unevenly distributed

regionally (e.g. areas with many peatland soils to be rewetted, have a disproportionately high investment burden), it is recommended to consider an ecological financial compensation mechanism. (SRU et al, §§154-155, §157).

– Discussing organizational capacities, SRU et al. stress that nature restoration should be coordinated by dedicated institutions at the level of states (Länder) and local communities. Where these institutions do not exist, they should be established to support private nature restoration efforts and to independently plan, prepare and implement other measures. These institutions should be active primarily on publicly owned land. If public land is not sufficiently available, their possibilities to access private land should be improved. Possible means include contractual rights of use, land swaps or purchases, and, in exceptional cases, expropriation. . (SRU et al., §§139-143)

– FEPSD et al. stress that enough trained and committed people (e.g. restoration planners, machine entrepreneurs, etc.) will be needed. It is necessary to train people in carrying out restoration measures, to ensure sufficient competence and operational capacity both at regional and national level and to create employment benefits at the local level. (FEPSD, Chapter 1.5).

Summary for discussion, leading to a position paper

Structural financing should provide long-term financial security for all actors when they embark on nature restoration projects, including investment and support measures. Governments must ensure sufficient funding and redistribute financial resources in favour of restoration. Due to uneven regional distribution of restoration tasks and costs, an ecological financial compensation mechanism within a Member State could be helpful.

Dedicated institutions at state, regional and/or local levels should coordinate restoration efforts, primarily on publicly owned land, with improved access to private land if needed.

Training and employing enough skilled individuals is essential for effective implementation and local employment benefits.

Extra elements to consider on June 4th

– As the NRL states that Member States should integrate in their national budgets' expenditure for biodiversity objectives, what can be said about the appropriate level of these expenditures?

– Public funding will not be enough to implement all restoration measures, therefor see below on 'generating business cases'.

10. Generating business cases

***See NRL, consideration n° 54**: "There are many extensive agricultural practices which have [...] benefits on the protection of biodiversity, ecosystem services [...]. [...] Financially attractive funding schemes for owners, farmers and other land-managers to voluntarily engage in such practices are important in delivering the long-term benefits of restoration.".*

***See NRL, consideration n° 80**: "Funding nature restoration measures [...] through private or public financing, including result-based support and innovative schemes [...] could be promoted.*

Private investment could also be incentivised through public investment schemes, including financial instruments, subsidies [etc.], provided State aid rules are complied with.".

***See NRL, article 14, §12**: "Member States may promote the deployment of private or public support schemes to the benefit of stakeholders implementing restoration measures referred to in Articles 4 to 12 including land managers and owners, farmers, foresters and fishers."*.

- MINARAAD et al. consider focusing on business models, public-private partnerships, and levers for private financing as important avenues to attain more structural financing. An investigation is needed into how restoration policies can lead to opportunities for entrepreneurs, including forestry and farmers, the broader agri-food sector and the timber sector. This would require a thorough analysis of the ways in which business models, measures and practices in agriculture, forestry and other sectors can best contribute to achieving the objectives of the NRL. More specifically, a focus is needed on supporting agroecological agricultural practices and organic farming, because they can offer opportunities to realize the conditions of Article 11. (MINARAAD et al., §6, §22).

- FEPSD et al. suggest that landowners should be offered concrete and easy-to-use solutions, 'turnkey-services' and clear service paths e.g. for the restoration of peatlands and fields. Moreover, 'restoration midwives' should be introduced: experts that support landowners and other actors with restoration activities. The possibility of performance-based subsidies should be explored, as they would incentivize landowners. Fixed-term commitments to improve the state of nature, accompanied by fixed-term subsidies, would however be a risk in the long term: if the termination of the contract leads to the loss of the natural values that have been restored, the funds invested are not well spent. Finally, a natural value markets could significantly expand the possibilities of restoration work by other actors (e.g. forest management associations). However, this would require the state to have clear criteria for calculating units of natural value, an official procedure for confirming them, and a register in which trading activities are recorded. (FEPSD et al., chapters 1.2., 1.5, 2.0. and 2.3.).

- Also SRU et al. state that private nature restoration efforts should be rewarded, e.g. as part of a reorientation of eco-schemes and eligible Agri-environment-climate measures. They consider the possibility of voluntary measures on a contractual basis, aiming at an improved ecological performance of landowners and land users. The advantage lies in the fact that measures are not unilaterally imposed by the state, which improves acceptance and promotes implementation. However, nature restoration is a binding task for the state, the achievement of which may not be made solely dependent on the conclusion of contracts. Long-term contractual conservation should be strengthened. (SRU et al, §18 and §180)

Summary for discussion, leading to a position paper

Private financing will be a crucial part in financing nature restoration efforts, entailing appropriate and feasible business models and public-private partnerships. Landowners and farmers should receive easy-to-use solutions and expert advice. Supporting agroecological practices and organic farming is essential. Performance-based subsidies could incentivize landowners, though fixed-term commitments pose long-term risks. Voluntary measures on a contractual basis can improve ecological performance, but state-led long-term conservation is necessary as well. Natural value markets could expand restoration possibilities, requiring clear criteria and a register.

Extra elements to consider on June 4th

– It all is about 'payment for ecosystem services': what is the extent to which this principle should be and can be implemented? The discussion and the practical examples are ongoing since some decades: what are the experiences and lessons-to-be-learned?

– A wide array of funding instruments is possible and have proven their worth in practice, such as 'land stewardship agreements', 'tax incentives for patronage by companies' etc.: how to find and decide for the most effective models, and how to ensure they are optimally used?

Conclusions

During the 4th of June session, we hope to pick out the most relevant questions arising from the list of solutions offered. We need context-specific ways to provide effective, fair and publicly accepted restoration policies and measures. That means understanding the intricacies of the local land-using sectors and the complete agro-food system.

But nonetheless, the European framework of the law also allows for collaboration and support. During our sessions we hope to build on thoughts regarding the EU's role and the similarities at national government level. What would we want from the EU level to help Member States communicate well? For streamlining, what would we need from the EU to help manage silos? What funding should be provided at the EU-level? And more importantly what business cases can the EU support with EU legislation?

Of course, we also ask what we all need to do at the national level for effective mainstreaming, streamlining and funding. This stage of the implementation presents us with a unique opportunity to learn from existing council publications and to use our joint discussion to lead us to commonly applicable solutions, despite differing regional and national contexts.

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