



EUROPEAN COMMISSION  
IMPACT ASSESSMENT BOARD

Brussels,  
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## Opinion

### Title

**Impact assessment on Communication EU Biodiversity Strategy to achieve the EU 2020 biodiversity target (draft version of 17 June 2010)**

#### **(A) Context**

In March 2010, the European Council adopted a new headline target for biodiversity to replace the expiring 2010 target. The new target reflects a higher level of ambition, as it calls not only for a halt to biodiversity loss but also to the degradation of ecosystem services and it highlights the need to restore them where possible. It also asks the EU to step up its contribution to averting global biodiversity loss.

The Council has called on the Commission to develop a new strategy to deliver on the 2020 target, including sub-targets and necessary, feasible and cost-effective measures and actions to reach them, as soon as possible after the 10th meeting of the Conference of the Parties to the Convention on Biological Diversity in Nagoya (CBD COP10).

#### **(B) Overall assessment**

**The IA report requires further work on several important aspects. Overall, it should provide a clear intervention logic that links the identified problems and their drivers with the proposed sub-targets (objectives) and respective options and measures. This should be achieved, firstly, by providing a clearer presentation of the problems including the obstacles that prevented the 2010 target from being reached and also by presenting a full baseline scenario. Secondly, the IA report should better justify the selection of the sub-targets intended to allow the 2020 target to be met and should discuss more systematically policy options available to achieve them. Thirdly, it should provide a clearer impact analysis of the expected contributions of the proposed options. Finally, it should present the different stakeholder views in greater detail.**

**Given the nature of these issues, the IAB requests DG Environment to resubmit a revised version of the IA report on which it will issue a new opinion.**

### **(C) Main recommendations for improvements**

**(1) Provide a clearer presentation of the problems and include a fully developed baseline.** The IA report should provide a more comprehensive assessment of the current state of biodiversity in the EU (e.g. by specie or environmental medium) and should explain to which extent and why the 2010 target has been missed. This should include an analysis of problem drivers and of the effectiveness of the contribution of existing key policy instruments, such as the Birds and Habitats Directive. The IA report should also explain the reasons for the low uptake of available financing. Given the uneven distribution of biodiversity assets in the EU (and differences in the progress made to protect them), the IA report should also clarify the extent to which the challenges differ across Member States (or groups of them). Finally the IA report should include a fully developed baseline that enables a better comparison of policy options for each of the sub-targets and demonstrates by how much the more ambitious 2020 targets are expected to be missed without further measures.

**(2) Justify better the selection of the sub-targets and further discuss the policy options/measures to achieve them.** The IA report should clarify in the main text how each of the six sub-targets were established and which alternative sub-targets were considered if any. It should also clarify the nature of each target (indicative vs. binding), consider the feasibility of setting some intermediate targets for certain policy areas (e.g. for forest management plans) and explain whether the sub-targets will be adjusted as the knowledge base evolves. On that basis the IA report should further discuss possible packages of policy options/measures in the main report, including options for financing. In doing so, the report should be more specific with respect to the measures that are innovative or new (when compared to the baseline) and/or have the potential to deliver early and significant results. The sub-target on fisheries should be aligned with the IA on the reform of the Common Fisheries Policy.

**(3) Provide a clearer assessment of the expected impacts.** The IA report should more clearly explain the expected contribution of the proposed options/measures (in terms of effectiveness and efficiency) to the three main policy objectives (halting biodiversity loss, ecosystem restoration and contributing to the global biodiversity), as compared to the baseline scenario. The transparency of this assessment would benefit from a summary table indicating the expected key costs and benefits linked to reaching the sub-targets (differentiated by options where appropriate). Finally, the IA report should outline the main distributional effects and indicate who would need to bear the main part of costs.

**(4) Present stakeholder views in greater detail.** The IA report should clarify whether all relevant stakeholders have been consulted on the definition of the sub-targets and the identification and assessment of appropriate measures. Throughout the text, it should also more transparently present the different views of relevant stakeholders (e.g. fishermen, farmers, forest owners, business etc) on the key measures and their impacts.

*Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.*

### **(D) Procedure and presentation**

The report should better respect the standards required by the IA guidelines by improving the readability of the report and its' clarity of argument. For this purpose the analysis of problems, including relevant problem drivers, should be consolidated in the problem definition section and presented together with the baseline scenario and elements of the impact analysis currently included in section 6 and annexes.

**(E) IAB scrutiny process**

Reference number	2010/ENV/004
External expertise used	No
Date of Board Meeting	12 January 2011