

08.12.2022 Joint statement

Committing to Better Biodiversity

Strengthening the Position of Biodiversity in the
Sustainable Transition



The drastic erosion of biodiversity in Germany reflects a worrying global trend, and yet this crisis of habitat loss, species extinction and the decline in genetic diversity within species is currently still widely ignored, even as billions of people are already feeling its impact.

Primary forest deforestation, peatland and salt marsh drainage, progressive and unsustainable agricultural intensification and overfishing all factor into large-scale biodiversity losses, on the one hand. At the same time, contemporary business practices are also placing enormous strain on biodiversity, with the **extraction and use of biotic and abiotic raw materials responsible for over 90 percent of bio-diversity loss worldwide.**¹

Today, public debate largely centres around the **tension between nature conservation and the expansion of infrastructure for the urgently needed energy transition.** Conversely, the German Council for Sustainable Development (RNE) and the German League for Nature and Environment (DNR) would claim the opposite to be true: effective climate protection, which includes an effective energy transition, is, in our view, a central pillar of successful nature conservation. We cannot afford to play sustainability issues off against one another. We need a systemic approach that promotes the energy transition, circular economy, infrastructure development and agricultural transformation alongside biodiversity and ecosystem preservation.

The disappearance of entire ecosystems, including their ecosystem services, is manifesting itself in the form of lost pollinators, infertile soils and a decline in genetic diversity – not least in rural areas of cultivation. This poses a threat to food security and economic development opportunities as well as human health, for instance as the risk of disease transmission from animals to humans, and the resulting pandemics, rises in parallel. Add resource scarcity to the mix, which has further exacerbated the **mutually reinforcing crises of biodiversity loss and climate change**, including global warming and an increase in extreme weather events, and we are left with an unprecedented risk to humanity.

The RNE and DNR are convinced that it is high time to take decisive action to protect our systemically invaluable biodiversity. **The long-term costs of inaction will prove far higher, and the burden on societies will be far from fairly shouldered.** Furthermore, existing cost-benefit calculations for a well-preserved environment are also economically convincing. In our view, adopting biodiversity as a shared commons will lay the **groundwork for social and economic cohesion** over the coming decades.

¹ UNEP, 2019: [Global Resources Outlook 2019](#) (last accessed 08.11.2022)



At the international level, it is imperative that all member states adopt an **ambitious new framework** in the spirit of solidarity at the Conference of the Parties to the Convention on Biological Diversity (World Conservation Congress) in Montréal, Canada, in December 2022. Only by setting an ambitious, binding target for biodiversity conservation and improvement will we create a reliable agenda for political, private-sector and social actors alike. We call on the German government to anchor the findings from the conference throughout Germany unreservedly.

Ecosystems across Germany must also be made more effective as a matter of urgency and population resilience strengthened to promote adaptation to the already tangible impacts of climate change. The poor state of biodiversity, among other factors, speaks to this urgency, as seen in the **inefficient or even negative trends to have emerged in the key biodiversity indicators set out in the German Sustainable Development Strategy (DNS)**. At the same time, the energy transition and food security feature more heavily in the political spotlight than ever, particularly in light of the Russian war of aggression against Ukraine. We assert, however, that species-rich ecosystems and their functions are an integral cornerstone in such systemic transformations.

The RNE and DNR advocate tackling these challenges not individually, but with **integrated solutions grounded in nature**. Accordingly, the RNE and DNR propose the following key points:

- 1. Introduce a measurable improvement imperative.** Current legal practice, which prescribes local compensation for unavoidable impact in the vicinity of where the damage occurred, has failed. Instead, we should qualitatively and sustainably harness the potential of nature and landscape on a large scale, both in additional protected areas and more broadly across the country. The focus here should fall on strengthening the ability of ecosystems to self-regulate. Systemic conservation measures and stable landscape populations can compensate for individual negative effects on specific animals. Where, for example, over-intensive agriculture and soil sealing are the primary causes of problems for species including the lesser spotted eagle, red kite, lapwing and skylark on landscapes characterised by farmland, forest, green space or residential areas, any intervention should focus on addressing those specific causes. Such a focus would promote a viable population in the long term, which would in turn allow this landscape to be used for agriculture and energy without causing harm to nature.

The RNE and DNR recommend that the “no degeneration” rule set out in the European nature conservation directives as well as the compensation regulations stipulated under nature conservation law be developed into a binding improvement imperative and incorporated into the Federal Nature Conservation Act. Accordingly, the admissibility of any interventions, and more specifically their accelerated approval, must then be



linked to evidence of a potential improvement in the ecology of entire ecosystems and populations, for instance through targeted national programs. As such, there must be significant improvements to both national and *Länder* monitoring of changes to species and biotopes. Where, as is the case for many species groups, such monitoring is not in place, it must be established. The current lack of data on species diversity, distribution and what habitats actually need leaves biodiversity conservation rarely taken into account as a matter of course in infrastructure planning and permits. In addition to adopting an improvement imperative, we recommend that project approval should only be given in the medium term where any ecosystems or populations affected by the project and its impact are in a good ecological condition or will be improved accordingly as part of the project. The German government should develop an appropriate technical and legal framework for this in a prompt manner.

- 2. Promote legal and planning support for biodiversity.** The poor condition of biodiversity in Germany leaves little doubt that the protection of ecosystems and populations is yet to be given sufficient weight in the consideration of protected natural resources as part of planning and approval processes. To underpin the mandate to protect the natural foundations of life enshrined in Article 20a of the Basic Law for the Federal Republic of Germany, it should be clearly written into the Federal Nature Conservation Act that safeguarding biodiversity is overwhelmingly in the public interest.

Furthermore, not unlike the debate surrounding go-to areas for wind energy, analogous go-to areas for nature incorporated in regional planning should also be introduced. Within these go-to areas, the legal framework must be updated to accelerate measures to restore ecosystem efficacy. Negotiations are currently underway at the World Conservation Congress in Montréal to reserve at least 30 percent of the world's land as impactful protected areas, with the EU Biodiversity Strategy² also targeting 30 percent for 2030. In Germany, too, effective protected areas should be established across open countryside in the form of green infrastructure biotope networks on a par with grey infrastructure. This target should also prove instrumental in limiting soil sealing from the current level of over 50 hectares per day to less than 30.³

To secure suitable land for green infrastructure, the RNE and DNR propose a joint national-*Länder* initiative to ensure faster planning and implementation without being weighed down with bureaucracy, as well as the creation or commissioning of bodies to carry out these changes (for example, land consolidation authorities). An additional positive step

² EU Biodiversity Strategy, 2020: [Factsheet: EU 2030 Biodiversity Strategy](#) (last accessed 08.11.2022)

³ German Environment Agency, 2022: [Siedlungs- und Verkehrsfläche in Deutschland \[Built-up and transport areas in Germany\]](#) (last accessed 08.11.2022)



should take the form of a land approach that specifies the designation of land at the regional level within the framework of regional planning, while simultaneously empowering local government in their planning sovereignty with regard to implementation and monitoring at the district level. This would better communicate the added value of the transformation and biodiversity conservation across entire landscapes and strengthen links between citizens and planning law. Equally, as the challenge continues to grow, we must also ensure an increase in the number of staff in relevant organisations.

3. **Anchor biodiversity regeneration work as a driver for corporate culture.**

Biodiversity erosion and the climate crisis pose an enormous risk to business. Accordingly, biodiversity protection should be firmly anchored in corporate activities, as is already often the case for climate protection. Corporate cultures and strategies need to adapt quickly and comprehensively, leveraging environmental due diligence to play a role in biodiversity. As part of this, corporate strategies should both incorporate existing and future risks arising from climate change and biodiversity loss into company operations (outside in) and demonstrate their company's impact on achieving binding climate and biodiversity targets (inside out). This two-pronged approach is at the core of the EU's Corporate Sustainability Reporting Directive (CSRD), which is due to be adopted at the end of 2022. The European Financial Advisory Group (EFRAG) is currently implementing this approach by developing binding standards for European sustainability reporting within the framework of the CSRD, with a separate standard (ESRS E4) planned in future. This standard will regulate the transparency of strategies, governance, risks, opportunities and impacts as well as indicators and targets of biodiversity protection for companies at EU level.

A significant improvement in impact data is needed for a better understanding of these interrelationships. In future, data from sustainability reports should therefore inform both company- and sector-specific strategies.⁴ This would make it possible moving forward to monitor whether company reports are redirecting financial flows and private-sector activities towards more biodiversity-friendly business models. Biodiversity offsetting is only of value in the interim; corporate activities must instead strive for climate neutrality, biodiversity and the circular economy.

As things stand, there is no internationally recognised, standardised and easy-to-measure indicator for biodiversity on the scale of how CO₂ has become the measurement and impact variable in the sphere of climate change mitigation. The RNE and DNR advocate developing an analogous

⁴ As already observable today in points when using the [German Sustainability Code/DNK](#) (last accessed 08.11.2022)



indicator or relevant indicator system and consider it essential for all relevant institutions at national and EU level alike to incorporate biodiversity as an authoritative and comprehensive factor in accounting and reporting standards.

- 4. Reduce competition for land and develop synergies.** Land is in short supply in Germany, meaning land use must serve the separate goals of climate protection, climate change adaptation, biodiversity and food production simultaneously. This is of particular relevance today, where tension often exists between biotope and species conservation on the one hand and new infrastructure, commercial and construction sites, and agriculture on the other.

With regard to the German government's biomass strategy, which is currently under development, the RNE and DNR recommend giving priority to food and nature conservation in issues of land use, designating areas particularly affected by competition for land in Germany and addressing the tension in said areas with targeted and integrated multi-purpose sites.

In future, legal frameworks and funding conditions (e.g. of the EU agricultural policy) must be designed in such a way as to make multi-purpose sites for nature conservation and renewable energy economically worthwhile. Examples could include combining open space photovoltaic facilities with agricultural production or biodiversity protection, the wet management of peatland sites with paludiculture, or agroforestry. The RNE and DNR further recommend the targeted promotion of products and markets for a sustainable bioeconomy. This could include reusing the by-products of agricultural production, generating value chains in rewetted peatlands, or launching bio-based products on the market.

- 5. Develop an effective toolbox for promoting sustainable agriculture.** Just as the energy transition steps up agricultural intensification and changes in land use, agricultural instruments and incentive structures also need to be adapted to ensure nature conservation in and across landscapes – without impacting the central goal: food production.

The RNE and DNR recommend implementing the principles developed by the German Commission on the Future of Agriculture to avoid negative external agricultural impact with a focus on incentivising agricultural work for the common good. As such, the federal government should shape the agricultural environment moving forward such that respectful land use remains economically worthwhile for farmers. Digitalisation, nitrification management and precision farming can produce measurable results all over the country within the framework of an attractive reward system for climate- and biodiversity-friendly land use and, in turn,



sustainable conventional agriculture. This must avoid, however, creating dependencies on individual technological systems.

The RNE and DNR would encourage the German government to explore a tradeable certificates scheme to reduce the risk and application rate of pesticides.⁵ Such a move should foreseeably and consistently precipitate both a drop in the risk involved and a 50 percent reduction in the use of pesticides by 2030, as envisaged both in the Farm-to-Fork strategy and in the Commission's proposal to regulate the sustainable use of pesticides.

In addition, we simultaneously advocate dropping any subsidies that cause harm to biodiversity and definitively expanding the entire biodiversity-friendly system with organic farming and the promotion of sustainable conventional agriculture, including by encouraging the consumption of sustainably produced products. The state should be sure to set a good example in this respect within the scope of public procurement opportunities, for example in community catering.

The RNE and DNR further recommend centring marine policy decision-making around climate and biodiversity loss mitigation. Marine space use planning must pivot from the ecosystem approach as a matter of course, with sectoral interests taking a back seat to the common good.

- 6. Strengthen biodiversity education and research on a broad scale.** To accelerate the systemic approach, we must first strengthen species and biodiversity expertise in skilled professions and training as well as research and teaching. Among other factors, this involves expanding options for baseline information as well as interdisciplinary study and research provisions in the fields of biology, ecology, ecotoxicology and agricultural sciences. Furthermore, we must also step up those efforts already underway to promote an interdisciplinary approach, such as from the German National Academy of Sciences Leopoldina and German Research Foundation (DFG).

Integrated approaches promise to help address the complex interrelationships of human impact on ecosystems and biodiversity in a more targeted way. Not unlike the planetary health approach, which identifies new areas of potential for human health and ecosystems, we need recognised and realised integrated approaches that serve to advance both the development of infrastructure for the energy transition, sustainable agriculture and circular economy *and* nature conservation.

Approximately three quarters of the world's most biodiverse areas are located in developing and emerging economies, where the poorest populations feel some of the worst effects of climate change. **Germany, with its resource- and energy-**

⁵ The majority of plant protection product manufacturers do not support the demand for trialling a tradeable certificates scheme for plant protection products, as they believe there is no guarantee this will add ecological value for biodiversity and the climate and question the practicality of such a scheme.



intensive economy and strong global interdependencies, bears a high responsibility for protecting ecosystems in the Global South and has a duty to provide far-reaching support in matters of international biodiversity conservation. The federal government's new funding pledge for global biodiversity conservation as part of the 77th General Assembly of the United Nations represents an important first step in shouldering this responsibility.⁶

Nonetheless, if we are to reverse biodiversity loss worldwide, it is imperative we **forge ahead with the systemic transformation of both our way of life and economy, as outlined above.**⁷ **A circular economy that accounts for planetary boundaries will prove an indispensable long-term lever** in achieving rich biodiversity and preserving ecosystems in Germany as around the globe.

⁶ German government (21 September 2022): [Mittel zur Finanzierung der Biodiversität erhöht \[Biodiversity funding increased\]](#) (last accessed 08.11.2022)

⁷ German Council for Sustainable Development, 2022: [Circular Economy](#) (last accessed 08.11.2022)

Imprint

The German League for Nature and Environment (DNR), the umbrella organisation for German conservation and environmental protection organisations

Marienstraße 19–20

10117 Berlin

↳ dnr.de

German Council for Sustainable Development (RNE)

Office c/o Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH

Potsdamer Platz 10

10785 Berlin

↳ nachhaltigkeitsrat.de/en/