



# COP15 – How does the post-2020 Global Biodiversity Framework compare with the EU’s Biodiversity Strategy ambition and targets?

This briefing provides a comparison of the level of ambition of the targets of the post-2020 GBF and of the EU BDS to 2030.

**Publication date:**

February 2023

**Author:**

Gabrielle Aubert,  
Nigel Dudley

The EU Biodiversity Strategy to 2030 (EU BDS)<sup>1</sup>, published in May 2020, is the policy that sets out how the European Union will contribute to the ambition of the Global Biodiversity Framework (GBF) to halt and reverse biodiversity loss and to put nature on a path to recovery.

The strategy was developed whilst the GBF was being drafted in preparatory meetings. It states that the EU is ready to “show ambition to reverse biodiversity loss, lead the world by example and by action, and help agree and adopt a transformative GBF at COP15”.

This briefing provides a comparison of the level of ambition of the targets of the post-2020 GBF<sup>2</sup> and of the EU BDS to 2030.

### **Target 3 – '30 by 30': Effective conservation and management of at least 30% of the world's lands, inland waters, coastal areas and oceans.**

The GBF commits to ensuring that by 2030, at least 30% of terrestrial and inland waters, and of coastal and marine areas (especially areas of particular importance for biodiversity and ecosystem functions and services) are effectively conserved and managed through ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures.

The target is ambitious, and the numerical target can be considered as a breakthrough for global biodiversity conservation. According to the European Commission, the wording in target 3 has no ambiguity and means that 30% on terrestrial and inland water should be protected, and 30% of coastal and marine areas as well. There is no ambiguity in the wording, and it is important avoid any difference in interpretation to ensure that national targets are harmonised and to reach the target by 2030. It is also considered important because inland waters tend to be under-represented in some conservation planning. In the BDS, inland waters are not targeted separately and are protected under the terrestrial target.

However, some NGOs and countries consider the wording to be a little ambiguous and it is not so clear that the protection of terrestrial and inland water should be counted under the same target.

The parties to the CBD must now submit their national targets to the CBD secretariat in a process known as 'correspondence reporting', a process that will need to ensure that national targets are harmonised.

The EU BDS requires the protection of 30% of the EU's land area, including inland waters, and 30% of the EU's marine area. The target in the marine area will require efforts to scale up the designation of marine protected areas at sea, which are far less extensive and effectively managed than terrestrial ones. The target for the land area is being assessed separately for each biogeographical region in the EU but combines the protection of land and inland waters in the same regional target<sup>3</sup>.

Moreover, the GBF does not commit to a strict protection target, whereas the EU BDS commits to strictly protecting at least a third of the EU's protected areas on both land and sea. NGOs and activists have criticised the removal of wording to exclude damaging activities from protected areas in the GBF target, which would have been closer to a strict protection provision<sup>4</sup>. On the other hand, the wording in the GBF relating to sustainable use in protected areas stresses that this should be 'fully consistent with conservation outcomes', which is stronger than in previous drafts.

Both global and EU targets refer to ecological connectivity, with slightly different wording. The EU BDS goes further than the GBF by committing to the creation of a Trans-European Nature Network (TEN-N), building on the existing Natura 2000 network, and creating connectivity between protected areas<sup>5</sup>.

Overall, the EU BDS 30 by 30 target is wider in scope than the GBF's, as it commits to strict protection of the most sensitive and important habitats and areas. Importantly, Member States are invited in the pledging process to make the links between the protected area expansion target and the EU target to improve the conservation status of 30% of species and habitats by 2030 – making clear how expanding the protected area network and strict protection will help restore and protect threatened habitats and species<sup>6</sup>. All protected areas will need to have clearly defined conservation objectives and measures. The GBF target is historic and ambitious, but the lack of mention of key biodiversity areas or equivalent prioritisation and of the exclusion of damaging activities is disappointing.

In terms of implementation, the CBD and EU frameworks have adopted quite similar processes for ensuring that targets are met and for monitoring progress. Parties to the CBD should submit national reports in 2026 and 2029 to help prepare global reviews and will monitor and report every five years (or less) on progress indicators. The EU has put in place a 'pledging' process whereby Member States will submit pledges to the European Commission in which they describe their new protected area designations that contribute to the EU-level targets, and 'peer review' one another<sup>7</sup>.

Both processes are voluntary and will depend on Parties' willingness to accurately report on their progress and on their individual ambition in contributing to the targets. The EU framework might be one step ahead of the CBD as it will expand an existing continent-wide network of legally designated protected areas under the EU Habitats and Birds Directives, while Parties to the CBD will only rely on their national networks. A careful examination of the national reports on the one hand and of the national pledges on the other will be needed to foresee whether the 30 by 30 targets will be achieved in each framework.

## **Target 2 – Restoration: Have restoration completed or underway on at least 30% of degraded terrestrial, inland waters and coastal and marine ecosystems**

The GBF's ambition to restore 30% of degraded terrestrial and marine ecosystems sounds more ambitious than the EU's overarching ambition to have effective restoration measures covering 20% of the EU's land and sea areas by 2030, though it depends on what is agreed globally as being degraded. However, the EU is strengthening its ambition by expanding this requirement to all ecosystems in need of restoration by 2050.

These EU requirements are part of the proposal for a Nature Restoration Law (NRL), which is currently being negotiated. The EU Parliament's Environment Committee has published a draft report which suggests raising the level of ambition of the headline target to put in place restoration measures covering 20% of the EU's land and sea areas to 30% by 2030<sup>8</sup>. It is however unclear whether this new ambition will be adopted during the dialogue.

The adoption of an ambitious NRL would allow the EU to put in place a binding framework for nature restoration, a huge step up from the GBF which is a voluntary framework. Its successful implementation would contribute to other targets of the GBF, such as halting species extinction and their recovery (target 4), reducing and mitigating the impacts of invasive alien species

(target 6) and increasing resilience through mitigation, adaptation and disaster risk-reduction actions, as it will promote the widespread use of nature-based solutions (target 8).

Both the EU and CBD targets lack clear wording on avoiding perverse results of 'restoration', such as afforestation of natural grassland in the name of climate mitigation. Clearer guidance is needed on site selection, for instance from the next CBD Conference of Parties.

### **Target 6 – IAS: Prevent the introduction of priority invasive alien species, and reduce by at least half the introduction and establishment of other known or potential IAS and eradicate or control IAS on islands and other priority sites**

The GBF target aims to reduce the rates of introduction or establishment of invasive alien species (IAS) by 50%, while the EU BDS commits to a 50% reduction in the number of Red List species threatened by invasive species, which is a different but more measurable indicator. Reducing rates of introduction is more operational and effective than merely controlling already established IAS, so it is important that the GBF target refers to prevention.

The GBF target sets a voluntary commitment to eliminate, minimise, reduce and or mitigate the impacts of IAS and to prevent the introduction and establishment of priority IAS, whilst in the EU this is already a legally binding commitment under the EU IAS Regulation. The GBF reference to eradicating or controlling IAS in priority sites, especially islands, is an important commitment to biodiversity protection in the global context, as invasive alien species have a huge impact on biodiversity on islands.

### **Target 7 – Pollution: Reduce by half both excess nutrients and the overall risk posed by pesticides and highly hazardous chemicals**

The GBF's and EU BDS's pollution targets are similar but differ on some critical aspects. The EU commits to a reduction of the risk and use of chemical pesticides by 50% and the use of more hazardous pesticides by 50%, and a reduction of losses of nutrients from fertilisers by 50% (which is mirrored by the EU Farm2Fork Strategy target to reduce nutrient losses to the environment from both organic and mineral fertilizers by at least 50%), while the GBF commits to a reduction of 50% of excess nutrients and the risk (but not the use) of pesticides and hazardous chemicals. The omission of the 'use' in the GBF is regrettable, but from a scientific point of view, targeting pesticide 'risk' is more than relevant, as it is possible to reduce their use while increasing their risk<sup>9</sup>.

The pollution target in the GBF is the result of a difficult compromise between countries and regions that had very different views on what should be included. Therefore, the language in the final text refers to risk reduction rather than quantitative reductions in the use of pesticides and chemicals.

The EU's approach to reducing the many sources of pollution is cross-sectoral, and the BDS refers to other EU policies that have been adopted or are being developed and that also set goals and actions to reduce pollution: the Farm2Fork Strategy, the EU Chemical Strategy for

Sustainability, the Zero Pollution Action Plan for Air, Water and Soil, and the upcoming Integrated Nutrient Management Action Plan.

The GBF pollution target includes efforts aimed at preventing, reducing and working towards eliminating plastic pollution but this remains quite vague. The EU BDS does not include a specific plastic pollution target, but the European Strategy for Plastics and the Circular Economy Action Plan include specific reduction targets to be implemented by Member States. Both are however important steps towards reaching a consensus on a global treaty on plastic pollution.

Overall, the GBF pollution target is quite weak, as it is not measurable and there is no agreed methodology yet for the indicator on pesticide risk. A technical group is expected to be working on the development of this indicator. In the EU, the European Commission is developing a set of indicators for the reduction of pollution. It will therefore be interesting to compare the global and EU indicators and their monitoring.

### **Additional targets in the GBF**

The GBF includes a range of targets that the EU BDS does not cover. However, for most of these, it is possible to find equivalent levels of ambition in the EU BDS or in other areas of EU environmental policy.

*Target 1 – Spatial planning: Reduce to near zero the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity*

- This GBF target has attracted much less attention than target 3 but is in many ways more radical. Advocacy to include key biodiversity areas within the target failed, although KBAs are mentioned among draft indicators. If tackled seriously, this target would act as a chapeau for many others (e.g., T4, T6, T9).
- The EU BDS recognises that there should be a specific focus on areas of very high biodiversity value or potential, which are the most vulnerable to climate change and which should be strictly protected. The approach is therefore different, as the GBF commits to stopping the loss of these areas whereas the EU commits to strictly protecting 10% of EU land and 10% of EU sea.
- The EU BDS also commits to define, map, monitor and strictly protect all the EU's remaining primary and old-growth forests. Other areas of carbon-rich ecosystems should be strictly protected.

*Target 4 – Species loss: Halt the human-induced extinction of known threatened species, and by 2050 reduce tenfold the extinction risk and rate of all species (including unknown)*

- The GBF is considerably more detailed than its Aichi equivalent, including reference to genetic diversity within and between populations, minimising human-wildlife conflict and including native, wild and domesticated species. But the numerical target (in Goal A but not repeated in Target 4) is almost impossible to measure because we do not know the

number of species in the world as a baseline, so this is mainly an aspirational target backing up actions by other UN conventions such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Convention on the Conservation of Migratory Species of Wild Animals (CMS). In particular, there is no explicit reference to signatory states making it an offence to kill species listed nationally or internationally as being in danger of extinction.

- The EU Habitats Directive, in place since 1994, makes it a legal offence to deliberately kill, capture or disturb a European-protected species, or to damage or destroy its breeding site, providing some legal protection to around 1500 listed species in the EU. The GBF is therefore still considerably weaker in this regard than this thirty-year-old EU legislation. This may reflect in part the challenges of enforcing species protection globally.

*Target 8 – Climate: Minimize the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction*

- The GBF target has three linked aims: (i) minimising climate change impacts on biodiversity; (ii) increasing the resilience of biodiversity to climate change and (iii) ensuring climate mitigation actions do not impact biodiversity. There are no quantifiable targets and Target 8 says nothing about the positive role that biodiversity and ecosystem services can play in mitigation and adaptation, although this is referred to briefly in Target 11 (see below). It does promote nature-based solutions and ecosystem approaches, which is an important step, especially at the global level. There has traditionally been poor links made between biodiversity and climate change within the UN and some aspects of the GBF mark important steps forward in this regard, although more is still needed.
- The EU NRL and Biodiversity Strategy both explicitly refer to climate mitigation amongst their aims (which is not the case in the GBF target 2 on restoration). The proposed EU nature restoration law also prioritises synergies between restoration for biodiversity and for mitigating or adapting to climate change. The EU therefore currently seems to have stronger targets on climate-biodiversity links than the GBF.

*Target 10 – Agriculture: Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity*

- The GBF target is more detailed than the Aichi one, listing a range of agricultural systems, although it is notable that the terms used (like 'sustainable intensification' and 'biodiversity friendly') remain only generally undefined and there is no mention of quantifiable systems such as organic agriculture. As with other unquantified targets, this will be hard to report against.
- In the EU, the latest reform of the Common Agricultural Policy includes EU-wide objectives for climate and environmental action. These include EU targets for 25% of organic agriculture by 2030, and reduction targets for the use of pesticides and fertilisers. In including a quantified target for organic agriculture, EU targets are considerably stronger than those of the GBF and, if successful or even partly successful, could provide

a model and leverage for future actions by the CBD. In practice, delivery is via national strategic plans, in which Member States set out which of the EU-wide objectives they will prioritise and how they plan to attain them. Some plans are disappointingly lacking in ambition<sup>10</sup>.

*Target 11: Restore, maintain and enhance nature's contributions to people, including ecosystem functions and services.*

- The GBF target is weak and unquantifiable. Most governments found it impossible to report against a similar Aichi target due to the vagueness of the wording and there is a risk that this achieves little. Clear advice on indicators is needed, along with more detail on the scale of ambition, unless this target is to prove irrelevant.
- The EU BDS called on Member States to map and assess the state of ecosystems and their services in their national territory with the assistance of the European Commission. It has stated aims to be a world leader in nature-based solutions research, but as yet no quantified target for implementation. The EU has a wider definition of nature-based solutions than the IUCN-endorsed global definition, which is broadly repeated in the UNEA definition<sup>11</sup>.

As noted, the success or failure of the GBF is now down to its implementation. The GBF monitoring framework will be of crucial importance in achieving the targets by 2030. As of the time of the adoption of the GBF, the monitoring framework includes a set of indicators and criteria to monitor and report on parties' progress on implementation. An ad hoc technical expert group will be in charge of operationalising the monitoring framework and discussing further details. Careful selection of additional indicators to represent the various nuances in several of the targets is a critical next step in the implementation of the GBF.

In the areas that we have analysed, current EU policies are stronger than those of the GBF and, critically, targets are backed by binding legislation or scaled-up voluntary ambition of the existing legal frameworks. Nonetheless, the final GBF is far stronger than seemed likely even a couple of days before the COP ended and, if followed would mark a major step forward in global approaches to the biodiversity and climate crises. There is still everything to play for.

## References

---

<sup>1</sup> [EU Biodiversity Strategy to 2030; Bringing nature back into our lives, COM\(2020\) 380, 20 May 2020](#)

<sup>2</sup> [Kunming Montreal Global Biodiversity Framework, CBD/COP/DEC/15/4, 19 December 2022](#)

<sup>3</sup> European Commission (2022) Criteria and guidance for protected areas designations. COMMISSION STAFF WORKING DOCUMENT, SWD(2022) 23 final, European Commission, Brussels.

<sup>4</sup> [The Scotsman, COP15: Historic '30 by 30' deal agreed at United Nations biodiversity summit, but lack of detail means it's an 'empty number', Ilona Amos, 19 December 2022.](#)

<sup>5</sup> [The Scotsman, COP15: Historic '30 by 30' deal agreed at United Nations biodiversity summit, but lack of detail means it's an 'empty number', Ilona Amos, 19 December 2022](#)

<sup>6</sup> SUB- EXPERT GROUP ON THE NATURE DIRECTIVES ("NADEG") 19th Meeting, 30 November 2022 Document N°: Doc NadeG 22-11-02

<sup>7</sup> [European Commission, Biodiversity: Commission guidance on new protected areas to help put Europe's nature on path to recovery by 2030, 28 January 2022](#)

<sup>8</sup> [Draft report on the proposal for a regulation of the European Parliament and of the Council on nature restoration, 2022/0195\(COD\) 5 December 2022](#)

<sup>9</sup> [Secretariat of the Convention on Biological Diversity. Science briefs on targets, goals and monitoring in support of the post-2020 global biodiversity framework negotiations. 2022. CBD/WG2020/4/INF/2/Rev.2](#)

<sup>10</sup> See for example the NGO assessment published December 2022 – at <https://eeb.org/library/new-cap-unpacked-and-unfit-joint-report-on-cap-strategic-plans/>

<sup>11</sup> UNEA Resolution on Nature-based Solutions for Supporting Sustainable Development. Resolution adopted by the United Nations Environment Assembly on 2 March 2022