Consultation

on the Final Report on Financing Natura 2000

as basis of a
Communication on Financing Natura 2000
# Table of Contents

Table of Contents.........................................................................................................1

1 Introduction...............................................................................................................2
  1.1 NATURA 2000 .........................................................................................................2
  1.2 MANAGING NATURA 2000 ..................................................................................2
  1.3 TOWARDS A FRAMEWORK FOR COMMUNITY CO-FINANCING .........................3

2 Consultation process.................................................................................................3
  2.1 STAKEHOLDER CONSULTATION ..............................................................................4
  2.2 WEB CONSULTATION ...............................................................................................4
  2.3 CONSULTATION OF COMPETENT AUTHORITIES .....................................................4

3 Summary of main points.........................................................................................5
  3.1 WHICH FUNDING OPTION TO CHOOSE .................................................................5

ANNEX.........................................................................................................................7

1 Comments from Stakeholders..................................................................................7
  1.1 ORAL COMMENTS .....................................................................................................7
    1.1.1 Funding Options ..................................................................................................7
    1.1.2 Measures ............................................................................................................8
    1.1.3 Other comments ................................................................................................9
  1.2 WRITTEN COMMENTS ............................................................................................10
    1.2.1 Funding Options ................................................................................................10
    1.2.2 Measures ...........................................................................................................12
    1.2.3 Other comments ...............................................................................................12

2 Web Consultation .....................................................................................................13
  2.1 FUNDING OPTIONS ................................................................................................13
  2.2 MEASURES .............................................................................................................15

3 Comments from Member States and Accession Countries ....................................18
  3.1 ORAL COMMENTS ..................................................................................................18
    3.1.1 Funding Options ................................................................................................18
    3.1.2 Measures ...........................................................................................................20
    3.1.3 Other comments ...............................................................................................22
  3.2 WRITTEN COMMENTS ............................................................................................22
    3.2.1 Funding Options ................................................................................................22
    3.2.2 Measures ...........................................................................................................22

4 List of Stakeholders consulted ...............................................................................23
1 Introduction

The Commission Communication to the Council and the Parliament on financing the Natura 2000 network has been prepared following extensive consultation of a wide range of stakeholders. This document explains the process followed for this consultation and outlines the results.

1.1 Natura 2000

Natura 2000 is the European ecological network of sites established under the Habitats Directive\(^1\). Its main purpose is the protection of habitat types and plant and animal species of Community interest in the European Union. It comprises both special areas of conservation (SACs) designated under the 1992 Habitats Directive, and special protection areas (SPAs) classified under the 1979 Birds Directive\(^2\).

The Natura 2000 network is a key pillar of Community action for the conservation of biodiversity. Significant progress has been made in the establishment of the Natura 2000 network through designation by Member States of more than 18,000 sites.

The establishment of the Natura 2000 network is a major achievement. However, its contribution to the long-term goal of protecting the Community’s biodiversity resources, will only be achieved if the sites which make up the network are managed appropriately. It is therefore crucial that, as the designation process set out in the Habitats Directive nears its conclusion, attention now turns more towards management of the sites. The implementation of these plans clearly raises the issue of the availability of financial and other resources required.

1.2 Managing Natura 2000

The provisions of the Habitats Directive clearly establish that the responsibility for ensuring the management of Natura 2000 sites lies with the Member States. In practice, for many Member States this responsibility is delegated to national or regional conservation agencies or in the case of federal states it may be defined as the responsibility of regional authorities.

Article 8 of the Habitats Directive provides for Community co-financing of measures required for the implementation and ongoing management of Natura 2000.

The financial needs of the Natura 2000 network relate to a broad range of measures required to ensure the efficient conservation management of the designated sites. It also includes investments that promote the public use and access to the sites in ways compatible with their conservation objectives. Given the extensive nature of the network, occupying around 17.5% of the territory of EU-15 and approximately 60 million hectares, it is not surprising that the anticipated costs are substantial.

1.3 Towards a framework for Community co-financing

The issue of appropriate Community financial support for the implementation of the Natura 2000 network has been the subject of resolutions by both the Council and the Parliament. In preparing its response to these requests, the Commission has been assisted by an Expert Group made up of representatives of Member States and a variety of interest groups. The report of the Expert Group, delivered to the Commission in December 2002\(^3\), helps to quantify the financial needs of the Natura 2000 network and reviewed experience of Community financing to date. It also identified and discussed options for future Community co-financing of the network:

- **Option 1** – using existing EU funds, notably Rural Development Regulation of the Common Agricultural Policy (CAP), Structural and cohesion Funds and the LIFE-Nature instrument, but modifying these in order to ensure better delivery against Natura 2000 needs;
- **Option 2** - enlarging and modifying the LIFE-Nature instrument to serve as the primary delivery mechanism; or
- **Option 3** – creating a new funding instrument dedicated to Natura 2000.

The preparation of this expert group report represents itself an initial phase of consultation given that the composition of the group already reflected a wide range of interest groups – Member States, landowning interests and environmental NGO’s.

The groups’ report has been widely circulated and used as the basis for seeking comments and inputs towards the preparation of the Commission Communication.

2 Consultation process

A variety of methods have been used to allow a wide as possible participation in the discussion of the future financing of Natura 2000 based on the report of the Expert Group on Article 8. This has included two Presidency Conferences, a public meeting with stakeholders in Brussels, opportunities for written comments and a web consultation have been facilitated.

A full list of the stakeholders and individuals that participated in the consultation is set out in the annex along with an analysis of the positions taken.

---

\(^3\) Available on line: http://europa.eu.int/comm/environment/nature/natura_articles.htm
During the consultation process the findings of the above mentioned Expert Group's Final Report on Financing Natura 2000 have been discussed. To structure the consultation two main areas for discussion were identified as a basis for soliciting opinions:

- Funding option to be chosen
- Measures eligible for co-financing
- Other comments

2.1 **Stakeholder consultation**

A public consultation with stakeholders on financing Natura 2000 took place the 26 March 2003 in Brussels. This was a one day meeting with NGO’s and other stakeholders. There was a good level of participation which gave rise to substantial discussions of the issues.

In addition to the oral hearing these stakeholders were asked to present their comments in writing.

2.2 **Web consultation**

In parallel to the oral and written consultation of targeted stakeholder a web consultation was set up and attracted numerous responses by a variety of stakeholders.

2.3 **Consultation of competent authorities**

The first public presentation of the Expert Group’s Report was in the meeting of the Nature and Forestry Directors of Member States and Accession Countries in Vigso during the Danish Presidency in November 2002.

Thereafter Member States and Accession Countries were consulted twice orally on how to finance Natura 2000. The first opportunity to give comments was during the Habitats Committee meeting the 10 March 2003, the second was during the Nature Directors Conference in Alexandroupolis the 10 -11 April 2003. In addition the competent authorities of Member States and Accession Countries were asked for written comments to scrutinise the results and the options presented in the report of the Expert Group.
3 Summary of main points

The results of the consultation responded to the main questions put by the Commission - namely what approach should be taken to funding? And which measures should be eligible? Additionally many of the participants raised the issue of the adequacy of the funds to be applied to Natura 2000 independent of the funding option chosen.

3.1 Which funding option to choose

While the expert group report, which formed the basis of the discussion during this consultation process, identified three funding options as listed in section 1.3 above it became clear in the discussion that opinions where focused on two options. Either funding should be from existing funds (option 1) or from a dedicated Natura fund (option 2 & 3).

Option 1 using existing funds

This option was favoured in most of the Member States comments received. It was however associated with concern as to the ability of environment ministries to effectively access funds from financial instruments managed by other ministries. Additionally many comments argued that an expanded Life Nature fund would also be needed to cover expenditure which would not be eligible for funding from existing instruments. This essentially argued for a combined option.

Creating a New Natura fund

This option was preferred by environmental NGO’s and agricultural and landowner interests. The main arguments but forwarded related to the need to guarantee that funding would be applied to Natura 2000 needs which was seen to be difficult to achieve under the first option. Landowning/agricultural interests argued that Natura funding needs were new elements. They should be met by new funds demonstrating that the Community was supporting financially the achievement of its objectives and this should not be achieved by diverting resources from priorities in the existing funding instruments. A linked concern motivates this choice on the issue of the overall sufficient of funds. Concerns were raised as to whether Natura 2000 could be adequately funded from instruments where it would have to compete for funds with other priorities.

2 Eligibility of measures

NGO’s and landowning interests expressed concern particularly as to the eligibility of conservation action in the Forestry sector. This latter element arguing either for an
expansion of the scope of existing instruments under the Rural Development Regulation or its coverage in a separate funding instrument. This was linked to concerns as to ensuring that landowners were adequately compensated for restrictions imposed on these by the designation of their land for Natura 2000.

In discussion with Member States it was, however, clear that this is a complex issue as many restrictions on landowners are already inherent in National legislation relating to planning and development and cannot therefore be directly attributed to the Natura 2000 designation. This is clearly a sensitive issue which will require further consideration.
ANNEX

1 Comments from Stakeholders

1.1 Oral Comments

On 26th March 2003 an oral hearing took place in DG Environment. Stakeholders were invited to present comments and opinions on the “Final Report on Financing Natura 2000”. This report would form the basis of a Communication on financing Natura 2000, which would be presented to the Council and Parliament.

Stakeholders were asked to consider in particular:
- The 3 options for co-financing presented in the report, bearing in mind the Commissions’ preference for option 1.
- The management measures for Natura 2000 sites presented in the report.

The following presents the main statements presented by NGOs and other stakeholders during a very lively meeting.

1.1.1 Funding Options

Plantlife International/Planta Europa welcomed the report as recognition of the fact that significant funding is needed for Natura 2000. They were keen to emphasise the criteria by which new funding mechanisms should be judged. They also stressed that adequate funding would be vital for both Member States and Accession countries. A range of recipients should be eligible to apply for any new fund – fishermen, landowners etc. should be included as well as farmers. They have reservations re Option 1 because of this.

The Natura 2000 Users Forum felt that Option 1 was not a solution; they felt that it made no changes and offered no more funding for activities. They felt that option 2 (a modified LIFE instrument) would be a good option if it were combined with other funds. They felt this combined option would cover all activities, including forestry.

Birdlife International said that LIFE had been very important in setting up innovative projects. LIFE sets them up, and then the Structural Funds take over. They understand the difficulties with setting up a new fund, but see difficulties with using existing ones as well. Site managers will have an administrative nightmare applying for some money from one fund and some from another. A simpler and more targeted fund would be better for Natura 2000.

The National Farmers’ Union welcomed the report and the meeting. They feel there is a major requirement for funding Natura 2000 sites, as designating sites is not a
They felt that the 3 options proposed by the Commission were too narrow, and that there was a need for a combined approach. This approach should redirect and adapt existing funds and use additional funds. The Rural Development Programme was developed for multiple purposes but it cannot be a solution to everything. There is a need for a dedicated pot of money to designate, maintain and manage sites – other funds could be complementary to this. Too many existing funds focus on thinking and planning rather than actual management. New funding and co-financing should focus on this. The National Farmers’ Union pleaded for States to take up the legal and moral responsibility they signed up to in ’92, and not just to subsidise administration.

The CEPF and Nordic Forest Owners welcomed the meeting and said they had been following the situation for 10 years. They feel that it does not make sense that we are only thinking about funding now. Money should be available before plans are made. Any funding instrument should be as clear as possible from the beginning. It is much easier for everyone involved if the system is clear. The funding instrument should also be cost-efficient to demonstrate how best results can be achieved. Natura 2000 areas are generally forests in Finland. Struggles between foresters and farmers for funding should be avoided. 70% of forests in Finland are owned privately – there should be a special instrument to ensure the owners affected by Natura 2000 are treated equally, regardless of the Member States.

Copa-Cogeca felt that an appropriate instrument should be created for financing Natura 2000.

WWF stated that they were pressing for a fund dedicated to Natura 2000 as well as adjusting other funds. They feel that DG ENV should retain a strong say in spending.

Eurosit felt that there is a risk of pressure from the WTO with option 1.

1.1.2 Measures

Plantlife International/Planta Europa felt that the innovation encouraged by LIFE would not be as well supported by other funds.

The CEPF and the Spanish Forest Owners Association pointed out that 72% of Natura sites in Spain were in forests. They presumed that percentages were similar throughout Europe, concluding that forests are particularly important for Natura 2000. They stated that 60% of forests in Spain are privately owned, and that most Natura 2000 owners are therefore private individuals. These individuals have to be convinced that Natura 2000 is a good thing. This can be quite political. The forest cycle goes on for generations in families, and the fundamental rights of these families are very important. They need to be taken into account if forest owners are to support Natura 2000. The methods used to evaluate spending on Natura 2000 in the report were based on public forests. Property rights were not taken into consideration. Owners of agricultural land and of forestry land should not have to fight each other for existing funds – this is bad for the country. The CEPF and the Spanish Forest Owners Association feel that the EU should pay property compensation and that Member States themselves should pay for management of sites.
The Natura 2000 Users Forum discussed which activities should be co-financed, and pointed out the problems with compensation and loss of rights. They referred to the Charter of Fundamental Rights, and emphasised the need to be careful about compensation and to mention it somewhere in the Communication.

Birdlife International pointed out that salaries for site managers are hard to fund under Structural Funds and the Rural Development Programme. They are concerned that Structural Funds are very limited in terms of application and geographical area (Northern countries cannot apply). They also wondered what would happen to land which is neither farm nor forest, and how sites would be maintained. In the long term there is no guarantee that the Rural Development Programme or Structural Funds will cover Natura 2000 activities after 2007. Structural Funds leave it up to Member States to use money as they see fit – how can one check that it is being used on Natura 2000? Some kind of monitoring is needed to guarantee that Structural Funds deliver some benefits for Natura 2000.

The National Farmers’ Union underlined the need for management and maintenance of sites. They agreed with Birdlife’s position on this. Retaining characteristic land management is vital for sites. There is an urgent need to look at this issue.

Stichting Natura referred to Birdlife’s point about control and monitoring, asking how we can ensure that funds are used properly if they are administered by other DGs.

Copa-Cogeca said that imbalances between farmers inside and outside Natura 2000 areas should be avoided. Only funds from the 2nd pillar should be used and the EU should refund farmers.

Birdlife/RSPB stated that it would be impossible to have labour-intensive LIFE monitoring. Monitoring of Agri-environment schemes has been inadequate. A lot of money has been spent inappropriately. A shocking new study of all published scientific research has shown that only 50 studies have been carried out in the whole of the EU. 80% of these were from the UK and Netherlands, and there were 3 from Ireland, Germany and Switzerland. A lot of these showed a decrease in bio-diversity. It is the responsibility of the Commission to put measures in place to ensure effective spending.

1.1.3 Other comments

CEEWEB asked whether the report really took accession into consideration when estimating costs for Natura 2000. They also asked whether the assessment of cohesion funds would consider Natura 2000.

Plantlife pointed out that the report reflects the benefits to the eco-system that Natura 2000 can provide. They asked if this should be emphasised more in the Communication to the parliament.
The NFU stated that there are concerns about Structural Funds in the UK. UK is likely to lose Structural Funds after 2007. In the UK, Structural Funds are normally used in urban areas, which may be a problem. They asked if this was the same in other Member States. They feel that the Rural Development Programme cannot cope with the demand for Rural Development. They pointed out that CAP reform could lead to uncertainty and difficulties for farmers in the future, and asked if there will be land managers in the future. They referred to section 4.2 of the report (CAP and market regimes). This gives a negative view of the CAP, but says it is good for the co-evolution and extension of habitats. They asked whether, in the context of major CAP reform, there were issues about a gap between Natura 2000 aims and what it can realistically achieve. They asked what the current CAP arrangements do to help environmental farming, and what the impact of decoupling was. They suggested that CAP reform was a key concern in estimating funding, and asked if it had been taken into consideration.

Stichting Natura asked about the further reforms of the CAP. They wanted to know what the status of the new proposals was in relation to this.

WWF said that the review of Structural Funds was now starting in REGIO, and that their proposals will be ready in June. They wondered whether the communication would take account of these proposals.

1.2 Written Comments

Together with the invitation for the hearing on 26th March 2003 the stakeholders were asked to present their comments as well in writing. A number of stakeholders contacted used the opportunity and introduced written comments. In the following the main arguments are stated or summarised, however not referring each time to the individual stakeholder as the main arguments were mostly presented several times.

1.2.1 Funding Options

The creation of a flexible and long-term financing instrument for Natura 2000 is the only way to achieve conservation objectives and coherence throughout the network in European territory. Only that will give a clear sign of political will towards the implementation of Natura 2000.

It is important to amend the present financing possibilities as suggested in option 1 of the expert group’s report. Certain quota are needed in the Rural Development and Structural Funds specifically for Natura 2000 and to ensure support for other EU biodiversity protection schemes. Prevention of local or national political passions in passing EU priorities is needed as well.

Concerning the 3 options for co-financing: The NATURA 2000 scheme is very important to us. The European Anglers’Alliance has no preferences in the regards on how to finance the NATURA 2000 only that adequate funding should be found. So if the Commission points at option 1 as the most realistic or best solution we shall do the same.
In reaction to the proposals, the Liga Para a Protecção da Natureza feels that in choosing an option one must take into consideration:
The current situation of the CAP and its consequences for the Environment and Social Justice, particularly the situation described for Portugal, and the implications of participation for farmers and their unions.

Regarding the 3 options presented in the Final Report I would consider the "LIFE PLUS" option mainly because it would be relatively easy to implement. That is a very important aspect, to have a new funding scheme as soon as possible. Some of the sites may already be damaged by the lack of active management actions.

This report raises fundamental questions and highlights the main strategies for making Natura 2000 a sustainable ecological network. To achieve this goal, especially in countries where biodiversity is relevant in social, economical and ecological terms in marginal territories, (as in Portugal) it is crucial to improve the funding capacity of LIFE-Nature and at the same time create a specific fund for Natura 2000 management. This last instrument would permit the establishment of a comprehensive and specific management instrument, allowing the preparation of scientific basis together with political willingness and technical expertise.

I think it might be useful to increase the financial volume of a LIFE+ financial instrument, but at the same time I would recommend that this instrument be restricted to the financing of non-recurring actions aimed at "improving conservation status".

The 10 basic principles approved by the EEAC, especially 4, 5, 6, 8 and 10, which state that multi-functionality must be the basis for bio-diversity conservation and for the maintenance of agriculture in less favoured and at-risk areas like large parts of Portugal, and which involve farmers and their unions, that is Option 1 reinforced by obligatory modulation. (EEAC, 2002- Towards Sustainable Agricultural Policies for Europe. Report by the Agricultural Working Group of European Environmental Advisory Councils).

In Portugal there are more than 1000000 hectares of uncultivated or unproductive land, which will not be covered by Rural Development measures and which need another instrument to reinforce LIFE-Nature, strengthening it and simplifying it and designed especially for less favoured areas and for the abandonment of farmland and forests.

All mechanisms should be simplified, and Nature conservation and the Natura network should be integrated with all European Agricultural support mechanisms.

It is now an important time for N2000 and the only way to sustain it is to launch its own funding instrument before Sept. 2003. As the experts have worked out, the amount needed for this is only ca. 5% of the EU budget. Because of the difficulties in availing of the existing funds it is not helpful to use only these funding instruments. It seems to be necessary to create a new and serious N2000 instrument like Intereg or Leader+. Although LIFE-nature is a good instrument, it is not able (and there are several reasons) to cover all Natura 2000 sites and measures.
I think that we need a new funding instrument with 3.4 - 5.7 billion Euro/p.a. for the "former" EU-MS after 2006, with co-financing of 75% by the EU. This should deal with all aspects of Natura 2000. I hope we will achieve this goal.

Some means of securing financing during the transition period should be proposed, and a genuine conservation strategy should be introduced immediately, as well as adequate management of the Natura network, involving farmers, their unions, NGOs and in particular Public Administration.

1.2.2 Measures

The implementation of Natura 2000 creation, development and improvement does not just depend on the budget available, but also on the positioning of key persons (specialized in species and habitats conservation) at ALL levels of the administrations managing the funds (FEOGA, FSE, etc.). If this does not happen (as is currently the case) the implementation of Natura 2000 is reduced to the completion of administrative procedures, and the sectorial managers (agrarian engineers, forestry officers, etc.) continue thinking as sectorial officers, rather than multifunctionnel integrated managers (working both in their specialised field and in Natura 2000). Horizontal specialists must be integrated at all levels of technical and financial management.

LIFE selection by the Commission is needed in the future for demonstration purposes for national authorities, for networking, and for comparing the results of national financing measures.

There is also a clear need to shift the immense amount of investment spent by CAP, which has a tremendous impact on the environment, namely in Natura 2000 sites. Otherwise many sites will have EC funding twice: first to promote agriculture activities and afterwards to develop habitat restoration in order to recover lost species and habitats. "Cross-compliance" has to work efficiently if we are to implement Natura 2000 and the European Sustainable Development Strategy.

The following question has not been discussed in the final report on the future financing of Natura 2000: should non-recurring investment costs and annual management costs for Natura 2000 areas be financed through the same financial instrument or not?

If they would be financed through the same instrument, there is a clear risk that the financing of additional investments, particularly those aiming at increasing and consolidating the extent of protected areas, will be neglected at the expense of the financing of "status quo" recurring management.

1.2.3 Other comments

For Natura 2000 to be a success it has to have clear benefits for the local populations who inhabit Natura 2000 sites, especially those in rural areas. A new funding scheme that allows the promotion of employment in rural areas is a guarantee of success in the
implementation of Natura 2000. We can only keep many of the traditional European landscapes if we give people in rural areas dignity and a good quality of life. Nature conservation is a "people issue" and we have to make people aware of that.

The table about the amount of money needed in 2003-2012 for N2000 demonstrates that different MS have used different criteria in sending information on future financing. It is necessary to use uniform criteria for this kind of comparison and for future allocations.

The final report seems to neglect the inverse relationship that exists between investment costs and recurring costs: the document argues that management costs will increase within the next years because the size of the protected areas is expected to increase. However, this is a relationship that is far from clear. With increasing size and consolidation of protected areas, that, the management costs for those protected sites that are currently fragmented or too small are expected to decrease in relative terms, and sometimes even in absolute terms. It might thus be worthwhile to check whether recurring management costs could not be reduced very sensibly if more emphasis was given to prior investment.

The Confédération Européenne des Propriétaires Forestiers hopes that the Working Group will further develop their report on the different aspects of financing Natura 2000, taking particular account of the loss of economic land use and other pertinent issues. CEPF suggest that the options of extending the LIFE fund or creating a dedicated financial instrument should be the subject of an in-depth study, taking into account the specific financing needs of the network and ensuring that the funds dedicated by the Union and Member States to the management of the network are perfectly clear.

2  Web Consultation

In parallel to the stakeholder consultation was conducted a web consultation. Here as well stakeholder organisations and citizens were invited to submit their reactions to and comments on the report - available on the Commission webpage - to allow the Commission to develop a Communication on financing Natura 2000. And again comments were particularly welcome on:

- The 3 options for co-financing presented in the report, bearing in mind our preference for option 1.
- The management measures for Natura 2000 sites presented in the report.

In the following are presented and partly summarized the main comments received.

2.1  Funding Options

Andalusia votes for opton 1 and in longer terms for a new own funding for NATURA 2000; LIFE +.
Azores Regional government wants an own LIFE-funding on long term.

Finland, Min of env, needs option 1 and needs for the future a certain quota from the funds (Rural development and Structurel Funds) for NATURA 2000. They prefer option 1 for up to now and option three for longterm view.

COLLI EUGANEI - VENETO Region wishes new funding for changed politics of natur-parks connected with NATURA 2000.

English nature vote for option 1 and an broad structured Life +.

EuroSite: Preferred solution would be for a separate, dedicated fund independent of other funds that have an actual or potential negative impact on the network.

Mediterranean Information Office for Environment: The volume of funds shall be allocated trough the new LIFE instrument (LIFE+) and has to be defined on the basis of total cost estimations for the establishment and management of Natura 2000 sites in the EU, i.e. including an evaluation of co-funding needs for the new Member States to this purpose.

Existing funds (CAP Pillar 2, Structural funds, Cohesion funds etc.) could support some of the activities in Natura 2000 sites.

NATURA Ecological Society votes for option 1 using the existent funds.

Private person: It shall be created a new finaniciong instrument for NATURA 2000 like LEADER + or INTERREG.

Private person: It should be aimed to increase the volume to a LIFE +, but restrict that fund for financing of non recurring actions like purchase of land and longtermed habitat-restorations.

Stiftung Natur Schleswig-Holstein: Option 1 is prefered when there is a consistent change from pilar one to pilar 2 of CAP. LIFE should be developped to a larger funding open for all partners of NATURA 2000.

Royal Society for the Protection of Birds: A reliable, predictable and sustainable funding seems only possible through a specific and new legal framework as Option 3. Option 1 would require radical reform of the CAP and Structural and Cohesion funds. The result would be unlikely to be simple for the recipient to understand or to administer and would risk Natura 2000 management requirements being left unfunded. It is unlikely to achieve the purpose of supporting the management of Natura 2000 sites either efficiently or effectively, given the administrative complexity of amending these funds, esp. CAP and RDR, so radically. Furthermore we believe that the operational complexity of having a number of funds covering one objective and of the consequent need for concertation procedures to ensure that under or over funding was excluded, means that this solution does not offer the Union value for money.

Regione toscana: Report and options are supported.
Scottish Natural Heritage: A development of Options 2 and 3 as an essential bridge in the short-term is seen as possible on the way to long term integration of Natura funding through mainstream EU funds (Option 1).

University of Coimbra: Capacities of LIFE Nature should be improved and at the same time a special fund for Natura 2000 should be created as a necessary management-instrument for a durable kind of planning and working inside the network of NATURA 2000.

Urban Heaths Partnership: The majority of the mechanisms within option 1 do not apply to urban sites. ERDF only applies in objective areas and the scope of ESF is limited to training. Only the LIFE+ option offers any real opportunities for urban sites and would need to be resourced to reflect the higher funding needs of urban sites.

Xarxa de Custodia del territori, Catalunia: Option 1 is favoured but should be opened for forest-areas and to the specific objectives of NATURA 2000. Especially RDR may have potential for protection and conservation measures in NATURA 2000-sites.

Option 2 would be to prefer, if there would be a chance to realise a new funding. But there may be no chance for new funding.

2.2 Measures

Andalucia: CAP and RDR will longer be used for NATURA 2000, an opening to forest is needed. In long term view LIFE should be developed to LIFE+ as a large funding open to all NATURA 2000 matters and for all partners of NATURA 2000. Higher budgeting will be necessary. Three-lateral contracts are wanted, frame contract with the EC and bilateral, multi-yearly contracts between regional government and private persons.

Azores Regional Government will get shifted a part of the immense amounts from CAP to NATURA 2000 to avoid first the devastation by agriculture activities and than the restoration by NATURA 2000 measures.

Finland: It is necessary in future to use uniform criteria for the financing and the needed amounts for NATURA 2000.

Spain, Min. of env needs subsidying for only priority habitats and species, Article 92/43 and birds from annex 1 79/4.

Valencia, Generalitat Valenciana remembers that the integration of horizontal specialists must be required to all type of technical and financial management levels. The integration of horizontal specialist must be required to all type of technical and financial managers’ levels.

Austrian economic chambers: Equal treatment in financing Natura 2000 for all those who are affected by Natura 2000 measures has to be guaranteed.

---

4 Original comments in Spanish
No distinction should be made if the company affected is active in a Natura 2000 region or close to the border of a Natura 2000 region because its responsibility is the same. Sufficient Natura 2000 financing subsidies should be offered to guarantee the continuing Natura 2000 implementation process. Management measures should be financed in the long run to provide planning certainty. Financing should be offered for expenditures that are necessary to implement and finance an adequate management plan.

The necessary adequate amounts for financing management and compensation measures should be made available in a simple and non-bureaucratic way.

**English Nature:** Furthermore, properly implemented, Option 1 could help reduce the damage to Natura 2000 sites as a result of lack of funding policy cohesion.

The attention of the Commission is drawn to the challenge of implementing Option 1. Extensive modifications to existing funding programmes are required together with a workable delivery mechanism. These practical hurdles should not create a barrier to the pursuit of this objective, but the risks associated should be acknowledged and managed.

**Eurosite:** The formulation now used in the proposal for the review of the Regulation for Rural Development (1257/1999) cannot be judged as positive. Although farmers are a vitally important group involved in the management of the Natura 2000 network, the proposal for amending this Regulation is not readily available to managers other than farmers.

In the light of Article 8, financing should not be restricted to a special category of projects.

**EEB:** We agree with the main comments of the other international organizations EHF, WWF and BirdLife which have been circulated to us.

Option 1 should be addressed as a matter of priority. DG ENV should have a controlling role in approval of funds. Ideally, Option 1 would include a screening to exchanging those projects with most environmental impacts and thus achieve a double effect. Option 1 should be complemented by option 2 and 3.

**BIRD LIFE**

See the oral comments.

**Coillante Ireland:** Accordingly, we would strongly encourage the continuance of the LIFE-Nature instrument (Option 1 or 2) for the funding of demonstration projects to build on and enhance the above benefits. We would also support using the existing EU funds as outlined in Option 1 but modifying them to ensure better delivery against Natura 2000 needs – preferably with the retention of a direct Commission involvement to ensure uniformity of administration on a Union-wide basis.

**Mio ECSDE, Greece:** Relevant information, training and capacity building on application procedures for co-funding and management of the funds allocated through the enlarged LIFE instrument should be systematically and regularly diffused among the potential beneficiaries in order to guarantee a most homogenous and efficient utilization of the funds.
The new co-funding instrument should consider marine areas and integrate in its logistic framework possible developments in policies related to the protection of marine habitats.

**Private person**: LIFE+ shall be restricted for non recurring actions especially land purchase and longtermed restorations.

**Private person**: New funding instrument shall be used for investment, purchase and so on but also for management, monitoring and similar. Cofinancing may be improved to 75 % for to reach the necessary budget for NATURA 2000.

**Royal society for the protection of birds, UK**: Sufficient amount of funding must be available, covering all geographic areas, available to all concerned in Natura 2000 conservation for the long term, support all necessary costs and flexible to support the most appropriate actions.

**Scottish Natural Heritage**: The current LIFE instrument requires some development to meet the Key Criteria (Section 5.2). A dedicated fund is required until adjustments have been made to mainstream EU funding mechanisms, CAP and RDR, to allow them to provide Natura benefits required by the Habitats and Birds Directives and wider social and environmental public goods associated with the 6th Environmental Action Plan and the EU Sustainable Development Strategy.

**Stiftung Natur Schl Holstein**: Farmers are not interested in cooperation with their arable land, because they have an (usually better financed) alternative to the compensation payment we offer them within the LIFE-project. This alternative is the subsidies of the first column, which give them a good income from their arable land.

Financing for the purchase of land is necessary to bring these sites to a good conservation state. It includes broad and robust buffer zones to manage nutrient input to NATURA 2000 sites and water level within NATURA 2000 sites.

No grant should be given for the actual normal farming with best practise,

Only a low grant should be given for environmental friendly farming regarding nutrients,

Higher grants should be given in buffer zones of NATURA 2000 sites if special restrictions are tolerated by the farmer, as e.g. water level rising, damage of drainage systems, renunciation of fertiliser and herbicides, wilderness-like extensive grazing on large scale (for e.g. >100 ha).

The highest grants should be given to special land management measurements that further the conservation state within NATURA 2000 sites, if the management has to be done with more restrictions comparing to number 3.

For special active measurements, as e.g. reintroductio programs for species, LIFE should exist also in future. LIFE should support also the planning and the purchase of land in a preparation phase of a regeneration plan. Especially for projects where water management has to bee changed, long-term projects should be possible with LIFE.

The EU-cofinancing should be increased up to 80% because under the economic situation it is very hard to get a national co-financing for LIFE-projects.

Very important will be that the criteria mentioned in chapter 5.2 will be established also on the national level. An important criterion is to open the financing system for all groups in nature management not only for farmers as it is now. The possibility for the purchase of land should be established in many programs. Here is the today
situation not equal between different countries as an application for an INTERREG-project show.

Urban Heaths Partnership: Education and awareness raising are of vital importance on urban sites where the majority of visitors are there for recreational purposes and are largely oblivious to the wildlife importance of the sites. To halt biodiversity decline in these areas human behaviour must be modified. In the UK it is much more difficult to fund these activities than conservation management.

This paper offers no funding opportunities for urban Natura 2000 sites outside Objective areas before 2006 as they are ineligible for all of the programmes subject to mid-term review in 2003/4, except ESF which cannot be used for anything other than training. Changes to ESF so it could more easily be applied to education about Natura 2000 sites rather than employment based training would be useful.

Xarxa de custodia del territori, Catalonia: More information and education is asked. Partnership between administration, landowners and NGO will improve the implementaton and acceptance of NATURA 2000. Forests must be more integrated in the existent fundings. Compensation for loss of landowners should be payed.

3 Comments from Member States and Accession Countries

3.1 Oral Comments

Member States and Accession Countries were twice consulted orally on financing Natura 2000. The first opportunity to give oral comments took place during the meeting of the Habitat Committee 10th March 2003, the second was during the nature directors conference in Greece 10th/11th April 2003.

In the following the main arguments given are summarized.

3.1.1 Funding Options

Austria: A completely comprehensive funding mechanism is supported. There should be a new funding mechanism for all needs. However, possibilities of existing funding mechanisms should be kept.

Belgium: Convincing the government in creating a new funding mechanism seems not to be very promising. Existing fundig-structures have to take into account nature protection and put some of their money to it from their budget.

Bulgaria: A completely comprehensive mechanism is supported.

---

5 spanish text
6 The following comments are comments from different representants of MS and CC in two meetings and might not be in any case the official comments from their states.
Cyprus: Own machinery in dealing with Natura 2000 is preferred.

Czech Republic: The establishment of new instruments for funding is not considered realistic.

Estonia: Cofinancing should be limited to certain measures, decided by national authorities.

Finland: Agro-environmental schemes are not applicable to the country. A separate specific mechanism, new one or based on LIFE is supported.

France: Official position of the country is not established yet, but the integration of Natura 2000 into different politics and the changes of existing funds are supported.

Germany presented the first results of their discussion on the report. The option to use existing funds is broadly supported. However, if the modifications needed are not achieved, the option to create a new fund might be reconsidered.

Holland: A new funding for Natura 2000 should not be chosen. MS can use and build on existing funds and, LIFE among the existing funds, should be optimized.

Hungary: Access to other funds should be maintained. Life Nature is supported but changes to it wouldn’t be opposed.

Ireland: Changes to existing instruments would probably be supported but no new funding. Life Nature should be maintained at a modest scale for innovation.

Italy: In cases, existing funding tools are not connected to the goals of the Habitats Directive a more specific instrument is needed to help.

Latvia: Existing funding mechanisms do not support forestland owners. The creation of a new mechanism is supported, though its creation is believed to be difficult.

Lithuania: Different funding mechanisms could accommodate all needs very flexibly. The easiness of formation of a new fund is doubted, though adjustment of existing mechanisms might also be difficult.

Romania: An enlargement of LIFE would be welcome because it focuses on environment (and nature) protection.

Slovakia: A comprehensive funding is supported. Existing funds a bit reshaped could cover Natura 2000 and nature conservation.

Slovenia: A combination of options is supported. Agri-environmental measures and development of the LIFE –Nature fund are considered as the basic funding mechanisms, but a new fund would be also supported.

Spain: A modification of Life to have a broader approach could give funds. Financing of the Network has to be solved.
Sweden: A mixed approach to different existing financing measures is supported. Establishment of a new funding instrument is not considered realistic because funds have to be reallocated, but an extended LIFE would be appreciated.

UK: The use of the existing funds mechanisms should be maximised. A major addition to LIFE would confront obstacles.

3.1.2 Measures

Austria: On going management and monitoring measures should be the first ones. Co-funding should be provided for loss of developmental rights, especially when the area is proposed as protected. Costs of existing state or public owned land should in principle be eligible.

Belgium: Cofinancing of Natura 2000 should also include also fix shares of the national budget. Compensation of developmental rights should be done only for those existing before the establishment of the network.

Bulgaria: management and monitoring of priority species and habitats should be chosen as priority measures.

Cyprus: Financing of geographical areas would not be wise since accession countries are still selecting special areas. Funding of loss of rights depends extremely on the national rules. Funding of loss of rights would not be wanted since it would bound extreme amounts of money.

Czech Republic: Priority measures should be management and monitoring, if there would be a uniform guideline. Compensation for land and loss of rights are felt very difficult and expensive.

Denmark: Common Agriculture policy, especially increase of productivity and nature protection should not confront. NATURA 2000 should be integrated like other traditionally environmental Directives. They may go hand in hand to other politics.

Estonia: Priority is land purchase (private forests) and promotion of site management. There is no need for compensation of loss of land or rights.

Finland: Compensation for loss of rights and loss of development are needed (constitutionally guaranted) The member states have to decide what measures they need. Evaluation of the geographical, protected areas is estimated as not so important.

France: Management actions are considered primary. Co-funding of developmental rights is considered very prudent but has to be tested.

Germany: RDR should mainly be used for ongoing management measures, while structural funds should, preferably, be used for investment measures. A catalogue of
proposals is currently being worked out and will be submitted to the Commission in due course.

**Hungary:** Measures for priority habitats/species and management and monitoring should be first ones. Compensation is accepted but should be eligible for accession countries.

**Ireland:** Payment to landowners, management costs and conservation and restoration to a favorable status of the habitats/species are considered as most important. Compensation for development rights from potential income should not be eligible and co-financing should concern only private land.

**Italy:** A mixed approach is supported. Synergies between existing mechanisms at Community level and at National and Regional level should be developed In cases, existing funding tools are not connected to the goals of the Habitats Directive and a more specific instrument is needed to help.

**Lithuania:** Compensation for the owners of land and forests is wanted.

**Hungary:** Compensation is accepted but should be eligible for accession countries.

**Ireland:** Development rights from potential income should not be eligible and co-financing should concern only private land. Life Nature should be maintained at a modest scale for innovation.

**Italy:** A mixed approach is supported. Synergies between existing mechanisms at Community level and at National and Regional level should be developed In cases, existing funding tools are not connected to the goals of the Habitats Directive and a more specific instrument is needed to help.

**Latvia:** Problems arising from forestland are not supported by the existing funds and has to be solved. Land purchase and compensation of losses is supported together with the creation of a new mechanism.

**Lithuania:** Priority is put on the designation of protected areas. Co-financing on compensation for the owners of land and forests is wanted.

**Slovakia:** Supposed lack between good practice in relation to biodiversity and co-funding of N2000 measures should be bridged. Loss of development rights should be compensated only if the rights existed before.

**Slovenia:** Priority measures are considered to be management of sites and concrete actions, communication programmes and monitoring. Compensation is not considered as eligible.

**Spain:** Financing to geographical areas with high percentage of land proposed or to priority species/habitats should be selected. Funding of loss of developmental rights is supported but only for rights recognized before the inclusion of sites NATURA 2000.
Sweden: Special types of measures belonging to practical working on site management restoration of sites, monitoring and information should be preferred in cofinancing. Loss of developmental rights is not supported to be eligible for funding, on the contrary costs for management public land are supported.

UK: Focus for measures should be given to priority species and habitats. Compensation should be follow the rule of the MS. UK sees a problem by giving state help to state.

3.1.3 Other comments

UK (and Accession Countries) highlighted the uncertainties of the cost estimates in the report due to outstanding designations. They were particularly concerned about cost estimates for marine areas.

Sweden commented on the usefulness of the report for internal use, in particular as in Sweden national financing is already ongoing.

3.2 Written Comments

Member States and Accession Countries got as well the opportunity to introduce additional written comments. Those received are summarised in the following.

3.2.1 Funding Options

Belgium, Ministerie van de Vlaamse G.: LIFE should get more efficient but be guaranteed.

Denmark: Implementation of Natura 2000 should be taken in the agri-politics and existing fundings.

Greece: None of the options is believed for viable of its own. A balanced combination between them should be found.

Poland: By reserve for more experience Common Agriculture Policy can cover some needs of NATURA 2000, but a new funding-mechanism would be supported.

3.2.2 Measures

Belgium, Ministerie van de Vlaamse G.: Integration of sectoral politics for sustainable evolution includes Financing of NATURA 2000 also by the existing funds. They should bring a fix part of the fundig for NATURA 2000 Habitats and species and so use cross-compliance in the classic funding. LIFE should get more efficient but be guaranteed. Compensation for land-rights and loss of income is accepted but needs general rules for all MS. There should be no difference between private and public real estates.
Denmark: For funding mechanisms, the broad approach and the building on existing instruments is supported. Politics should go hand in hand and increase of productivity should not confront the nature protection. Implementation of Natura 2000 should be taken in the agri-politics and existing fundings.

Germany: Recurrent and one-off measure account for 50 per cent each of the costs estimated for the implementation of Natura 2000. As far as EU co-financing is concerned, the aim must therefore be a 50-60 per cent share coming from CAP coffers (chiefly for ongoing measures), and a 40-50 per cent share coming from the Structural Funds (mainly for one-off/ investment measures). That way, existing EU financial instruments can be used. With a view to exhaustive implementation of Natura 2000, there is considerable need for adapting or developing those EU financial instruments. To that end, the Regulation No. 1257/99 must be reviewed. Regarding investment measures, either a new Community Initiative, “Natura 2000” is needed, or INTERREG must be realigned to cover Natura 2000. In addition, the option for EU co-funding of investment by way of amending Article 33 of 1257/99 should continue. Necessary adaptations of and amendments to existing EU financial instruments are annexed in the German report.

Greece: None of the options is believed for viable of its own. A balanced combination between them should be found. Especially management and monitoring should be incorporated in a new fund. It cannot be felt as regular part of the existing funds.

Poland: By reserve for more experience Common Agriculture Policy can cover some needs of NATURA 2000, but a new funding-mechanism would be supported.

4 List of Stakeholders consulted

<table>
<thead>
<tr>
<th>ONG</th>
<th>Address</th>
<th>City</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>BirdLife International</td>
<td>22 rue de Toulouse</td>
<td>B- 1040 Brussels</td>
<td><a href="mailto:claire.papazoglou@birdlifeeco.net">claire.papazoglou@birdlifeeco.net</a></td>
</tr>
<tr>
<td>Wetlands International</td>
<td>Droevendaalsesteeg 3A Building 100 PO Box 471</td>
<td>6700 AL Wageningen, The Netherlands</td>
<td><a href="mailto:henderikse@wetlands.agro.nl">henderikse@wetlands.agro.nl</a></td>
</tr>
<tr>
<td>Euronature -European Nature Heritage Fund</td>
<td>Grabenstrasse 23</td>
<td>D-53359 Rheinbach/Bonn Germany</td>
<td><a href="mailto:info@euronatur.org">info@euronatur.org</a></td>
</tr>
<tr>
<td>Eurosite</td>
<td>Postbus 1366</td>
<td>NL-5004 BJ Tilburg</td>
<td><a href="mailto:eurositenl@eurosite-nature.org">eurositenl@eurosite-nature.org</a></td>
</tr>
<tr>
<td>EEB European Environmental Bureau</td>
<td>Boulevard de Waterloo 34</td>
<td>B-1000 Brussels</td>
<td><a href="mailto:stefan.scheuer@eeb.org">stefan.scheuer@eeb.org</a></td>
</tr>
<tr>
<td>Europarc</td>
<td>Kröllstrasse 5 PO Box 1153</td>
<td>D-94 475 Grafenau</td>
<td><a href="mailto:office@europarc.org">office@europarc.org</a></td>
</tr>
<tr>
<td>ONG</td>
<td>Address</td>
<td>City</td>
<td>Email</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>-----------------------------------</td>
<td>---------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>IMCG/ International Mire Conservation Group</td>
<td>28 rue des Aubépines</td>
<td>59270 METEREN (FRANCE)</td>
<td><a href="mailto:info@imcg.net">info@imcg.net</a></td>
</tr>
<tr>
<td>IUCN The World Conservation Union European Regional Office</td>
<td>IUCN Regional Office for Europe 15, rue Vergote</td>
<td>1030 Brussels – Belgium</td>
<td><a href="mailto:Tamas.marghescu@iucn.org">Tamas.marghescu@iucn.org</a></td>
</tr>
<tr>
<td>Societas Europea Herpetologica</td>
<td>655A Christchurch Road</td>
<td>Dorset BH1 4AP, UK</td>
<td><a href="mailto:herpconstrust@hcontforce9.net">herpconstrust@hcontforce9.net</a></td>
</tr>
<tr>
<td>EUCC</td>
<td>P.O. Box 11232</td>
<td>NL-2301 EE Leiden</td>
<td><a href="mailto:admin@eucc.nl">admin@eucc.nl</a></td>
</tr>
<tr>
<td>Europêche</td>
<td>National Federation of Fishermen’s organisation Masden RD Fisa Docks</td>
<td>Grimsby DN31 35G UK</td>
<td><a href="mailto:bdeas@nffo.org.uk">bdeas@nffo.org.uk</a></td>
</tr>
<tr>
<td>PLANTA EUROPA</td>
<td>21 Elizabeth Street,</td>
<td>London SW1W 9RP UK</td>
<td><a href="mailto:coordinator@plantaeuropa.org">coordinator@plantaeuropa.org</a></td>
</tr>
<tr>
<td>CEEWEB Central and East European Working Group for the Enhancement of Biodiversity Decision on Membership pending</td>
<td>Kossuth u. 13, H-3525 Miskolc Hungary</td>
<td><a href="mailto:Biodivhu@mail.matav.hu">Biodivhu@mail.matav.hu</a></td>
<td></td>
</tr>
<tr>
<td>Syndicat des Sylviculteurs du S-OE</td>
<td>6, Parvis du Chartron</td>
<td>F-33075 Bordeaux CEDEX</td>
<td><a href="mailto:Ssso@alienor.fr">Ssso@alienor.fr</a></td>
</tr>
<tr>
<td>USSE</td>
<td>Av. Madariaga 1 – 1º</td>
<td>E-48014 Bilbao, España</td>
<td><a href="mailto:Usse@usse.es">Usse@usse.es</a></td>
</tr>
<tr>
<td>COPA-COGECA</td>
<td>Rue de la Science, 23-25</td>
<td>B-1050 Brussels</td>
<td><a href="mailto:dominique.dejonckheere@copa_cogeca.be">dominique.dejonckheere@copa_cogeca.be</a></td>
</tr>
<tr>
<td>MTK - Central Union of Agricultural and Forestry Producers</td>
<td>P.O. BOX 510, (Simonkatu 6), FIN-00101 Helsinki, Finland</td>
<td><a href="mailto:Martin.lillandt@mtk.fi">Martin.lillandt@mtk.fi</a></td>
<td></td>
</tr>
<tr>
<td>FECOF - Fédération des Communes Forestières</td>
<td>PO Box 5006</td>
<td>D-66623 Nohfelden</td>
<td><a href="mailto:Fecof@nohfelden.de">Fecof@nohfelden.de</a> Or <a href="mailto:Battistel@ismaa.it">Battistel@ismaa.it</a></td>
</tr>
<tr>
<td>Forst und Gutsbetriebe Oesterreichs</td>
<td>Schauflergasse 6V</td>
<td>A-1010 Wien</td>
<td><a href="mailto:Office@avlf.at">Office@avlf.at</a></td>
</tr>
<tr>
<td>National Union of Farmers</td>
<td>Agriculture House 164 Shaftesbury Avenue</td>
<td>London WC2H 8HL</td>
<td><a href="mailto:Andrew.clark@nfu.org.uk">Andrew.clark@nfu.org.uk</a></td>
</tr>
<tr>
<td>French Private Forest Owners</td>
<td></td>
<td></td>
<td><a href="mailto:Jean-marie.barbier@forettriveefrancaise.fr">Jean-marie.barbier@forettriveefrancaise.fr</a></td>
</tr>
<tr>
<td>Natuurmonumenten</td>
<td>Postbus 9955</td>
<td>1243 ZS ’s-Graveland</td>
<td>g.vandermast@natuu</td>
</tr>
<tr>
<td>ONG</td>
<td>Address</td>
<td>City</td>
<td>Email</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>----------------------------------------------</td>
<td>---------------</td>
<td>--------------------------------</td>
</tr>
<tr>
<td>IEEP</td>
<td>Fifth Floor</td>
<td>London</td>
<td><a href="mailto:Reaton@ieeplondon.org.uk">Reaton@ieeplondon.org.uk</a></td>
</tr>
<tr>
<td></td>
<td>Dean Bradley House</td>
<td>SW1P 2AG</td>
<td></td>
</tr>
<tr>
<td></td>
<td>52 Horseferry Road</td>
<td></td>
<td></td>
</tr>
<tr>
<td>European Habitats Forum</td>
<td>c/o WWF-EPO</td>
<td>1040 Brussels</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Tervurenlaan 36 B12</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Habitat Users’ Forum</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>BFN</td>
<td>Konstantinstr. 110</td>
<td>D 53179 Bonn</td>
<td><a href="mailto:Ssymanka@bfn.de">Ssymanka@bfn.de</a></td>
</tr>
<tr>
<td>Taiga Rescue Network</td>
<td>Box 116</td>
<td></td>
<td><a href="mailto:Elisa.peter@taigarescue.org">Elisa.peter@taigarescue.org</a></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>European Mountain Forum LTD</td>
<td>28 Rue Mauverney</td>
<td>CH-1196 Gland, Switzerland</td>
<td><a href="mailto:europe@mtnforum.org">europe@mtnforum.org</a></td>
</tr>
<tr>
<td>WWF International Danube-Carpathian Programme</td>
<td>Ottakringerstr. 114-116</td>
<td>A -1160 Vienna</td>
<td><a href="mailto:Dep@wwf.at">Dep@wwf.at</a></td>
</tr>
<tr>
<td>International Friends of Nature (IFN)</td>
<td>Difenbachgassen 36</td>
<td>A-1150 Wien</td>
<td><a href="mailto:m.pils@nfi.at">m.pils@nfi.at</a></td>
</tr>
<tr>
<td>International Network for Sustainable Energy - Europe</td>
<td>Gl. Kirkevej 56,</td>
<td>8530, Hjortshøj, Denmark</td>
<td><a href="mailto:ove@inforse.org">ove@inforse.org</a></td>
</tr>
<tr>
<td>Coalition Clean Baltic</td>
<td>Ostra Ågatan 53</td>
<td>SE-753 22 Uppsala, Sweden</td>
<td><a href="mailto:gunnar.noren@ccb.se">gunnar.noren@ccb.se</a></td>
</tr>
<tr>
<td>FERN</td>
<td>1c Fosseway Business Centre, Stratford Road</td>
<td>Moreton-in-Marsh, Gloucestershire GL56 9NQ, UK.</td>
<td><a href="mailto:Fern.belgium@wando.be">Fern.belgium@wando.be</a></td>
</tr>
<tr>
<td>Centre International de Droit Comparé de l’Environnement</td>
<td>Hôtel de la Bastide – 32, rue Turgot</td>
<td>F. 87000 Limoges France</td>
<td><a href="mailto:cidce@voila.fr">cidce@voila.fr</a></td>
</tr>
<tr>
<td>European Forum on Nature Conservation and Pastoralism</td>
<td>Lower Barn, Rooks Farm Rotherwick Hook</td>
<td>Hampshire RG27 9BG United Kingdom</td>
<td><a href="mailto:info@efncp.org">info@efncp.org</a></td>
</tr>
<tr>
<td>European Forum on Nature Conservation and Pastoralism</td>
<td>Kindrochaid, Gruinart Bridgend, Isle of Islay</td>
<td>Argyll, PA44 7PT United Kingdom</td>
<td><a href="mailto:info@efncp.org">info@efncp.org</a></td>
</tr>
<tr>
<td>ONG</td>
<td>Address</td>
<td>City</td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>--------------------------------</td>
<td>--------------------------</td>
<td></td>
</tr>
<tr>
<td>European Foundation for Landscape Architecture - EFLA</td>
<td>Rue Washington, 38-40</td>
<td>B-1050 BRUSSELS</td>
<td></td>
</tr>
<tr>
<td>European Society for Environment and Development - ESED</td>
<td>432 Boulevard Lambermont</td>
<td>B-1030 Brussels</td>
<td></td>
</tr>
<tr>
<td>Federation of Associations for Hunting and Conservation of the E.U (FACE)</td>
<td>82, rue Frédéric Pelletier</td>
<td>B-1030 Bruxelles</td>
<td></td>
</tr>
<tr>
<td>Friends of the Earth Europe - FOEE</td>
<td>Rue Blanche 29</td>
<td>B-1060 Brussels</td>
<td></td>
</tr>
<tr>
<td>Seas at Risk</td>
<td>Drieharingstraat 25</td>
<td>NL-3511 BH Utrecht</td>
<td></td>
</tr>
<tr>
<td>Youth and Environment Europe</td>
<td>Ekologicie centrum Toulcuv Dvur Kubatova 1/32</td>
<td>102 00 Prague 10 - Hostivar</td>
<td></td>
</tr>
<tr>
<td>Green 8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stiftung Europäisches Naturerbe - Euronatur</td>
<td>Konstanzer Str., 22</td>
<td>78315 Radolfzell Allemagne</td>
<td></td>
</tr>
<tr>
<td>European Anglers Alliance - EAA</td>
<td>Rue du Parnasse, 42</td>
<td>B-1050 Brussels</td>
<td></td>
</tr>
<tr>
<td>EEA</td>
<td>Kongens Nytorv 6</td>
<td>DK-1050 Copenhagen K Denmark</td>
<td></td>
</tr>
<tr>
<td>Greenpeace International – European Unit</td>
<td>Chaussee de Haecht ,159</td>
<td>1030 Bruxelles</td>
<td></td>
</tr>
<tr>
<td>WWF European Policy Office - EHF Secretariat</td>
<td>Avenue de Tervuren 36</td>
<td>B-1040 Brussels</td>
<td></td>
</tr>
<tr>
<td>European Topic Centre on Nature Protection and Biodiversity - ETC/NB</td>
<td>Museum National d'Histoire Naturelle 57 rue Cuvier</td>
<td>F-75231 Paris cedex 05</td>
<td></td>
</tr>
<tr>
<td>EFI - European Forest Institute</td>
<td>Torikatu 34</td>
<td>FIN-80100 Joensuu</td>
<td></td>
</tr>
<tr>
<td>CEPF</td>
<td>Rue du Luxembourg 47 – 51</td>
<td>B - 1050 Brussels</td>
<td></td>
</tr>
<tr>
<td>Royal Belgian Institute of Natural Sciences</td>
<td>Rue Vautier 29</td>
<td>B-1000 Brussels</td>
<td></td>
</tr>
<tr>
<td>FEAP</td>
<td>54 Rue Nicholas Fossau</td>
<td>B-4100 Boncelles</td>
<td></td>
</tr>
<tr>
<td>ONG</td>
<td>Address</td>
<td>City</td>
<td>Email</td>
</tr>
<tr>
<td>---------------------------</td>
<td>----------------------------------------------</td>
<td>------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>UNICE</td>
<td>Rue Joseph II, 40</td>
<td>B-1000 Brussels</td>
<td><a href="mailto:c.wolsdorff@unice.be">c.wolsdorff@unice.be</a></td>
</tr>
<tr>
<td>EEAC</td>
<td>C/o Sachverständigenrat für Umweltfragen SRU Postfach</td>
<td>D-65180 Wiesbaden</td>
<td><a href="mailto:ingeborg.niestroy@ub.de">ingeborg.niestroy@ub.de</a></td>
</tr>
<tr>
<td>EIB</td>
<td></td>
<td></td>
<td><a href="mailto:p.carter@eib.org">p.carter@eib.org</a></td>
</tr>
<tr>
<td>Centre for Ecology &amp; Hydrology</td>
<td>Monks Wood, Abbots Ripton</td>
<td>Huntingdon PE28 2LS UK</td>
<td><a href="mailto:dor@ceh.ac.uk">dor@ceh.ac.uk</a></td>
</tr>
<tr>
<td>EPBRS</td>
<td>Centre for Ecology &amp; Hydrology</td>
<td>Aberdeenshire AB31 4BW Scotland, UK</td>
<td><a href="mailto:adw@ceh.ac.uk">adw@ceh.ac.uk</a></td>
</tr>
<tr>
<td>Regional Organisations</td>
<td>Greter London Authority Biodiversity Strategy Marsham Street</td>
<td>London SW1P 3PY UK</td>
<td><a href="mailto:dave.dawson@london.gov.uk">dave.dawson@london.gov.uk</a></td>
</tr>
<tr>
<td>ECNC</td>
<td>European Centre for Nature Conservation PO Box 1352</td>
<td>NL-5004 BJ Tilburg</td>
<td><a href="mailto:Drucker@ecnc.nl">Drucker@ecnc.nl</a></td>
</tr>
<tr>
<td>CLIMATE NETWORK EUROPE</td>
<td>Rue de la Charite 48</td>
<td>1210 Brussel</td>
<td><a href="mailto:karla@climnet.org">karla@climnet.org</a></td>
</tr>
<tr>
<td>TRANSPORT &amp; ENVIRONMENT</td>
<td>Boulevard de Waterloo, 34,</td>
<td>B-1000 Brussels</td>
<td><a href="mailto:beatrice.schell@t-e.nu">beatrice.schell@t-e.nu</a> ou <a href="mailto:info@t-e.nu">info@t-e.nu</a></td>
</tr>
<tr>
<td>AEIDL</td>
<td>260 Chausée Saint Pierre</td>
<td>B-1040 Brussels</td>
<td><a href="mailto:Aeidl@aeidl.be">Aeidl@aeidl.be</a></td>
</tr>
<tr>
<td>European Landowner Organization</td>
<td>Avenue Pasteur 23</td>
<td>1300 Wavre</td>
<td><a href="mailto:elo@skynet.be">elo@skynet.be</a></td>
</tr>
<tr>
<td>Bureau of Nordic Family Forestry</td>
<td>Rue d’Arlon 82</td>
<td>1040 Brussels</td>
<td><a href="mailto:tiina.rytila@lrf.be">tiina.rytila@lrf.be</a></td>
</tr>
<tr>
<td>EUROMONTANA</td>
<td>46, rue Philippe le Bon</td>
<td>1000 Bruxelles</td>
<td><a href="mailto:euromontana@skynet.be">euromontana@skynet.be</a></td>
</tr>
</tbody>
</table>