Date: 24/07/2015 16:38:40

Public consultation as part of the Fitness Check of the EU nature legislation (Birds and Habitats Directives)

Fields marked with * are mandatory.

Public consultation as part of the 'fitness check' on EU nature legislation (Birds Directive, Habitats Directive) (EN)

About you

*Your name or organisation:

40 character(s) maximum

Swedish Bioenergy Association

Please provide your EU Transparency Register ID number (if you have one):

15 character(s) maximum

966151316592-05

If your organisation is not registered, you can register now.

- *Can your reply be published:
 - with your name or that of your organisation?
 - anonymously?

For information on how your personal data and contribution will be dealt with, please refer to the privacy statement in the introduction to this consultation.

*What is your main country of residence or activity?

- BELGIQUE-BELGIË
- DANMARK
- DEUTSCHLAND
- EESTI
- ESPAÑA
- FRANCE
- HRVATSKA
- IRELAND
- ITALIA
- LATVIJA
- LIETUVA
- LUXEMBOURG
- MAGYARORSZÁG
- MALTA
- NEDERLAND
- OTHER COUNTRY (non-EU)
- POLSKA
- PORTUGAL
- ROMÂNIA
- SLOVENIJA
- SLOVENSKO
- SUOMI / FINLAND
- SVERIGE
- UNITED KINGDOM
- ÖSTERREICH
- ČESKÁ REPUBLIKA
- ΕΛΛΑΔΑ (ELLADA)
- KYΠΡΟΣ (KÝPROS)
- България (BULGARIA)

Region (optional):

- NORRA SVERIGE
- SÖDRA SVERIGE
- ÖSTRA SVERIGE

I alli I	epiying to tins questionnaire as
	an individual
	a business
	a non-governmental organisation (NGO)
	an organisation or association (other than NGO)
	a government or public authority
	a European institution or agency
	an academic/research institute
(C)	other
*Is you	r organisation:
(a	an international organisation
a	a business network or association
(a	a charity
(iii)	other
*Which	of the following best describes your main field of activity or interest?
	agriculture
(C)	angling
(C)	construction & development
(C)	culture
⊚ €	education
◎ €	energy
◎ €	environment
◎ €	extractive industry
f	ish farming & associated activities
f	ishing (other than angling)
f	orestry
r	nunting
⊚ r	nature
⊚ r	ecreation
(iii)	science
○ t	ourism
⊚ t	ransport
○ v	vater management

Part 1 - General questions

(not important				
(not very important				
(important				
(very important				
2. H	ow familiar are you with EU nature	conservatio	n measures?		
		not familiar	slightly familiar	quite familiar	very familiar
	*Birds Directive	0	0	0	•
	*Habitats Directive	0	0	0	•
	*Natura 2000 network of protected areas	0	0	0	•
(How important to nature conservation of important not very important important very important very important I don't know	ion are the E	nius anu nabili	als Directives	. :
The who recome The at the	Are the Directives' strategic objective is to mean account of the Birds Directive is to mean account of the Birds Directive is to mean account of the corresponds to ecological, scientific and cultivaries are strategic objective of the Habitats Directive is the account of the conservation status, taking into account aracteristics.	naintain the popu ural requirements pecies to that lev o maintain or res	lation of all species of s, while taking account of all species of states of the state	of wild birds in the int of economic an and species of Co	EU at a level d recreational
(not appropriatesomewhat appropriateappropriatevery appropriateI don't know				

*1. How important is nature conservation to you?

*5. Is the approach set out in the Directives an appropriate way to protect species and habitats in the EU?

The Directives require EU countries to establish strict protection rules for all of Europe's wild birds and a wide range of other rare, threatened or endemic species, and to designate specific nature protection areas to assure the long-term survival of Europe's most valuable and threatened species and habitats, as well as migratory birds. Together, these areas form a network covering approximately 18% of the EU and over 4% of its seas.

0	not	appr	opriate
		app.	opilato

-			
0000	somewhat	annro	nriate
	Somewhat	appio	priate

- appropriate
- very appropriate
- I don't know

*6. Have the Directives been effective in protecting nature?

- not effective
- somewhat effective
- effective
- very effective
- I don't know

*6 b. If you think the Directives have not been effective or have only been somewhat effective, is this mainly due to:

- problems inherent in the legislation
- problems with implementation
- problems with enforcement
- none of the above
- I don't know

*7. How important is the Natura 2000 network for protecting threatened species and habitats in the EU?

The Natura 2000 network comprises some 27,000 protected areas with a high biodiversity value covering approximately 18% of the EU and over 4% of its seas.

- not important
- somewhat important
- important
- very important
- I don't know

*8. How do the costs of implementing the Birds and Habitats Directives co	mpare with the
benefits from their implementation?	

- The implementation costs are more or less equal to the benefits
- The implementation costs are somewhat greater than the benefits
- The benefits of implementation are somewhat greater than the costs
- The implementation costs far exceed the benefits
- The benefits of implementation far exceed the costs
- I don't know

9. While the Directives are primarily focused on conserving nature, to what extent have the following been taken into account in implementing them?

	Not at all	Not enough	Enough	Very well	l don't know
*Economic concerns	0	•	0	0	0
*Social concerns	0	•	0	0	0
*Cultural concerns	0	•	0	0	0
*Regional characteristics	0	•	0	0	0
*Local characteristics	0	•	0	0	0

10. Do EU policies in the following areas generally support the objectives of the Birds and Habitats Directives?

	No	Yes	Could contribute more	I don't know
*Agriculture & rural development	0	•	0	0
*Fisheries & maritime	0	0	•	0
*Cohesion (regional)	0	0	0	•
*Energy	0	•	0	0
*Transport	0	0	•	0
*Environment	0	•	0	0
*Industry/enterprise	0	0	•	0
*Climate change	0	0	•	0
*Health	0	0	•	0
*Research & innovation	0	0	•	0

*11. To what extent have the Directives provided more value than could have be	een
acheived through national or regional laws in this area?	

-					
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- some added value
- significant added value
- I don't know

- no added value
- some added value
- significant added value
- I don't know

^{*12.} To what extent have the Directives added value to the economy (e.g. job creation, business opportunities linked to Natura 2000)

*13. To what extent have the Directives brought additional social benefits (e.g. health, culture, recreation, education)?
no added value
some added value
significant added value
I don't know
*14. Is there still a need for EU legislation to protect species and habitats?
O Yes
No
I don't know
*Would you like to answer the more specific questions in part 2 of the questionnaire?
Yes
No

Part 2 - specific questions

Effectiveness

The following questions explore the extent to which the objectives of the Birds Directive and Habitats Directive have been met, and any significant factors which may have contributed to or inhibited progress towards meeting those objectives.

15. How effective have the Birds and Habitats Directives been in:

	Not at all effective	Not very effective	Somewhat effective	Very effective	l don't know
*protecting threatened bird species	0	0	•	0	0
*protecting all wild bird species	0	0	•	0	0
*protecting threatened species (other than birds)	0	•	0	0	0
*protecting Europe's most threatened habitat types	0	•	0	0	0
*establishing a system to protect species	0	•	0	0	0
*ensuring that species are used sustainably (e.g. hunting, fishing)	0	0	•	0	0
*establishing an EU-wide network of protected areas (the Natura 2000 Network)	0	0	•	0	0
*managing & restoring sites in the Natura 2000 network	0	•	•	0	0
*ensuring proper assessment of risks to Natura 2000 sites from new plans & projects	0	0	•	0	•
*regulating the impact of new plans & projects on Natura 2000 sites	0	0	•	0	0
*encouraging the management of landscape features outside Natura 2000 sites	0	•	0	0	•

16.To what extent do the Directives help meet the EU Biodiversity Strategy objectives?

The EU Biodiversity Strategy identifies 6 targets and 20 actions to help Europe halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restoring these as far as feasible, while increasing EU support for preventing global biodiversity loss.

	No contribution	A small contribution	A significant contribution	A very significant contribution	l don't know
*protecting species & habitats	0	0	•	0	0
*maintaining & restoring degraded ecosystems & their services	0	•	0	•	0
*conserving & improving biodiversity on agricultural & forested land	•	•	©	•	0
* ensuring sustainable use of fisheries resources	0	•	0	0	0
*combating the introduction & spread of invasive alien species	0	•	0	0	0

*Helping conserve biodiversity worldwide	©	•	•	0	0

17. How effective overall have the Directives been so far?

	Not at all effective	Not very effective	Somewhat effective	Very effective	l don't know
*Birds Directive	0	•	•	•	0
*Habitats Directive	0	•	0	0	0

18. Where the Directives have succeeded, to what extent have the following contributed?

	No contribution	Minor contribution	Moderate contribution	Major contribution	l don't know
*The Directives are clearly worded	0	•	0	0	0
* Effective enforcement	©	•	©	©	©
*Effective EU-level coordination	0	•	0	0	0
*Effective national coordination	0	0	•	0	0
*Effective regional coordination	0	•	•	0	0
*Effective local coordination	0	•	•	0	0
*Guidance & best practice on implementation	•	•	•	•	©
*Sufficient scientific knowledge of species & habitats	0	•	©	0	0
*Dedicated funding	0	•	0	0	0

*Appropriate human resources	0	•	©	©	0
*Stakeholder involvement	•	0	•	0	0
*Public awareness & support	0	•	0	0	0
*Nature conservation is well integrated into other policies	•	•	©	©	0
*Appropriate management of protected areas	•	•	0	0	0
*International cooperation to protect species & habitats	•	•	•	0	•

19. To what extent are the following limiting progress towards the Directives' objectives?

	Not restricting progress	Somewhat restricting progress	Significantly restricting progress	l don't know
*The Directives are not clearly worded	0	•	0	0
*Ineffective enforcement	0	•	0	0
*Ineffective EU-level coordination	•	•	0	0
*Ineffective national coordination	•	©	0	0
*Ineffective regional coordination	•	•	0	0
*Ineffective local coordination	•	0	0	0
*Insufficient guidance & best practice on implementation	©	•	0	0
*Unclear guidance & best practice on implementation	•	•	0	0

*Gaps in scientific knowledge of species & habitats	©	©	•	0
*Insufficient funding	0	0	•	0
*Insufficient human resources	0	•	0	0
*Insufficient stakeholder involvement	0	0	•	0
*Low public awareness & support	0	•	0	0
*Insufficent integration into other policies	0	•	•	0
*Lack of appropriate management of protected areas	0	0	•	0
*Lack of or limited international cooperation to protect species & habitats	•	•	0	•

Efficiency

The following questions explore whether the costs of implementing the EU Nature Directives are reasonable and in proportion to the results achieved. The directives were designed to promote the conservation of species and habitats, but they also provide other benefits to the environment and society. Costs arise from administrative requirements, compliance enforcement, and forfeited opportunities, for instance those due to licensing delays or restrictions on activities in Natura 2000 sites.

20. How significant are the benefits associated with the Directives?

	Insignificant benefits	Minor benefits	Moderate benefits	Major benefits	l don't know
*Benefits to wild bird conservation	0	0	•	0	0
*Benefits to species conservation (other than birds)	0	0	•	0	0
*Benefits to habitat conservation	0	©	•	©	0
*Other environmental benefits, e.g. soil, water & air quality	0	•	0	0	0
*Benefits to the economy (e.g. local jobs, tourism, research & innovation)	•	0	0	0	0
*Benefits to society (e.g. health, culture, recreation, education)	•	0	0	0	0

21. How significant are the costs associated with the Directives?

Administrative costs include costs of establishing and running management bodies, preparation and review of management plans, public communication and consultation, site designation, including scientific studies, consultation, costs linked to permitting requirements, investigations and enforcement.

Opportunity costs include foregone development opportunities, delays in development, or restrictions on other activities (e.g. recreation, hunting) resulting from site and species protection.

	Insignificant costs	Minor costs	Moderate costs	Major costs	l don't know
*Natura 2000 site management costs	0	•	•	0	0
*Costs of protecting species of birds	0	0	•	•	•
*Costs of protecting species other than birds	•	•	©	•	0
*Administrative costs	0	0	•	0	0
*Opportunity costs	0	0	0	•	0

22. Are these costs proportionate, given the benefits associated with the Directives?

	Disproportionate	Proportionate	I don't know
*Natura 2000 site management costs	0	•	0
*Costs of protecting species of birds	•	0	0
*Costs of protecting species other than birds	•	•	•
*Administrative costs	•	0	0
*Lost opportunity costs	•	0	0

23. On the basis of experience to date, to what extent have the following caused any inefficiency?

	Not at all	To some extent	To a large extent	l don't know
*How the Directives are written	0	•	0	0
*How compliance is enforced at EU level	0	•	0	0
*How the Directives are implemented nationally	0	0	•	•
*How the Directives are implemented regionally	0	•	0	0
*How the Directives are implemented locally	0	•	0	0
*Interaction with other EU law & policies	0	0	•	0

24. Have any of the following become more or less efficient over time?

	More efficient	The same	Less efficient	l don't know
*How the Directives are managed at EU level	0	•	0	•

*How the Directives are implemented nationally	•	0	•	•
*How the Directives are implemented regionally	0	0	•	0
*How the Directives are implemented locally	0	•	0	•
*Interaction with other EU law & policies	0	•	0	0
*Interaction with other national law & policies	0	0	•	0

*25. Overall, how well are funding needs for implementing the Directives being met?

- Sufficient funding, efficiently used
- Sufficient funding, not efficiently used
- Insufficient funding, efficiently used
- Insufficient funding, not efficiently used
- I don't know

Relevance

The following questions explore the extent to which the Birds and Habitats Directives meet the needs of species and habitats of EU conservation concern, and whether they are still an appropriate and necessary means of protecting nature in the EU.

25. How important are the Directives to safeguarding Europe's biodiversity?

	Not at all important	Not very important	Important	Very important	l don't know
*Birds Directive	0	0	•	0	0
*Habitats Directive	0	0	•	0	0

26. How important are the Directives to protecting species and habitats from the following pressures and threats?

	Not at all important	Not very important	Important	Very important	l don't know
*Loss or fragmentation of habitats	0	0	0	•	0
*Unsustainable use of species & habitats	0	0	0	•	0
*Pollution	•	0	0	0	0
*Introduction & spread of non-native plants & animals	0	•	0	0	0
*Climate change	•	0	0	0	0

27. How well do the Directives cover the habitats and species that most need conservation in the EU?

Both the Birds and Habitats Directives contain annexes which list the species and habitats protected under each Directive, and the level of protection.

	Not well at all	Not very well	Sufficiently well	Very well	l don't know
*Birds Directive	0	•	0	0	0
*Habitat Directive	0	•	0	0	•

Coherence

This section explores whether the Birds and Habitats Directives are consistent with each other and with other policies and legislation, whether they are complementary or if there are significant gaps, overlaps and inconsistencies that prevent them from being effectively implemented

28. To what extent to you agree with the following statements?

The EU has commitments to protect nature under international conventions and agreements, such as the Convention on Biological Diversity, Bern Convention on European Wildlife, the Convention on Migratory Species, the Convention on International Trade in Endangered Species, and the African Eurasian Waterbird Agreement.

	Totally disagree	Mostly disagree	Neither agree nor disagree	Mostly agree	Totally agree	l don't know
*The objectives and requirements of the Birds and Habitats Directives are consistent with each other and mutually supportive	•	•	•	©	•	•
*The objectives and requirements of the Birds and Habitats Directives are consistent with those of the EU Biodiversity Strategy	©	©	•	©	•	©
*The objectives and requirements of the Birds and Habitats Directives are in line	0	•	•	0	0	0

with international				
commitments to protect				
nature				

29. Are there any significant gaps, overlaps or inconsistencies between the Birds and Habitats Directives and the following EU environment legislation that limit the extent to which the Directives can be effectively implemented?

	No	Yes	I don't know
*Strategic Environmental Assessment Directive	0	0	•
*Directive on environmental impact assessment of projects	0	0	•
*Water Framework Directive	0	0	•
*Marine Strategy Framework Directive	0	0	•
*Floods Directive	0	0	•
*National Emission Ceilings Directive	0	•	0
*Nitrates Directive	0	0	•
*Environmental Liability Directive	0	0	•

EU added value

The following questions explore whether EU nature legislation has made a difference compared to national, regional and/or local action alone, and if so, how.

30. To what extent have the EU Birds and Habitats Directives helped improve the following, over and above what could have been achieved through national or regional legislation?

	No contribution	Minor contribution	Moderate contribution	Significant contribution	l don't know
*Standards for nature protection	0	0	•	•	0
*The extent of protected areas	0	0	•	©	•
*Protection of wild bird species	0	0	•	©	•
*Protection of threatened species (other than birds)	0	0	•	©	0
*Protection of threatened habitat types	0	0	•	•	0
* Management of habitats	0	•	0	©	0

*Restoration of degraded habitats	©	•	©		0
*Research into & knowledge about species & habitats	•	•	•		•
*Funding for nature conservation	•	•	•	•	©
*Staff assigned to nature conservation	•	•	•	•	•
* Cross-border cooperation on nature conservation	©	©	•	•	•
*Networking & exchange of best practice in nature conservation	•	•	•		•

*Integration of nature conservation into other policies	•	•	©		0
*Public awareness of nature conservation	•	•	•		0
*Stakeholder participation & engagement in nature conservation	•	•	•		0
*Building partnerships & resolving conflicts around nature conservation	•	•	•	•	•
*Providing a level playing field for businesses	0	•	0	•	0
*Meeting international nature conservation commitments	©	©	•	©	0

*Regulating hunting	0	0	•	©	0
*Economic benefits linked to job creation, investment in tourism & recreation	•	•	•		•

*31. If the EU nature Directives did not exist, would the overall state of species and habitats in the EU be...

- the same
- somewhat better
- somewhat worse
- much better
- much worse
- I don't know

Final remarks

Any further comments?

Text of 1 to 2000 characters will be accepted

Habitats and species recognised within the directive is often not the most relevant species and habitats on a national level. Therefore will not the most effective protection activities be prioritised. It is not possible to point out habitats and species relevant for all EU nations. Instead the directives lead to more administration and expensive cost for investigation of the specific species and habitats in the directives. The result is a negative impact on forestry and agriculture in EU. Instead of using biomass produced within EU for renewable energy (and other renewable products) we have to import fossil products from countries outside EU. Production of fossil products have severe negative impact on both nature and climate. The directives is therefore contra productive and in not in line with the development of a EU-bio economy and regional development in EU countries.

Thank you for your feedback!

Contact

http://ec.europa.eu/environment/nature/legislation/fitness_check/index_en.htm