



Recovery Plan: a "grey" plan that forgets Italian Nature.

Critical elements and request for amendments to the National Recovery and Resilience Plan.

April-May 2021

1) Lack of concrete objectives and actions to achieve the targets of the 2030 European Biodiversity Strategy and Farm to Fork Strategy.

Despite the fact that the European Commission has indicated the principles of the Green Deal as the way forward for the Union, particularly in the 2030 Biodiversity and Farm to Fork strategies published in May 2020, in the National Recovery and Resilience Plan (from now on NRRP or Plan) (https://www.governo.it/sites/governo.it/files/PNRR_0.pdf), they are completely ignored, both in form (mentioned only once in the entire Plan and in general terms) and, above all, in substance.

The NRRP does not clarify how Italy intends to achieve the targets that the Strategies set for this decade, thus losing the possibility for the country to align the funds with the European objectives on nature conservation, despite the explicit EU guidelines.

2) Lack of a coherent plan for the restoration of the Italian territory.

With regard to the fundamental need to restore ecosystems, also referred to in the European Biodiversity Strategy, the NRRP does not present any coherent and strategic programme for the restoration of ecosystems. Besides actions concentrated on the Po River and action on the seabed and marine habitats, the plan ignores almost all of Italy and fails to contribute to the objective of improving the conservation status of habitats and species protected by the European Habitats and Birds Directives.

Although the NRRP states that 'interventions in the NRRP will act at 360 degrees on forests, soil, sea and air to improve the quality of life and well-being of citizens through the protection of existing areas and the creation of new ones', in fact there are no investments aimed at restoring biodiversity.

In general, the restoration and conservation objectives set out in the European Biodiversity Strategy (from which Italy is still a long way off, as is clear from the reporting on the Habitats and Birds Directives), including that of ensuring a positive trend for at least 30% of the species and habitats currently in an unsatisfactory conservation status, are not taken into account in any way. The very few actions to address the critical issues related to biodiversity protection are addressed in a simplistic, if not trivialised, way, reducing them to urban forestation and digitisation of park's services.

Protected areas are considered from a purely touristic and recreational point of view, forgetting both the priority objective of nature protection and conservation, and the objectives of the European Biodiversity

Strategy to protect at least 30 % of the land surface and 30 % of the sea and to allocate 10 % to strict protection.

In the chapters on investments in combating hydrogeological instability, the necessary emphasis and preference is not given to nature-based solutions, which would have a positive effect in the long term.

On the contrary, the way is de facto open to works of land artificialisation, in convergence with programmes and projects already prepared and presented by many local authorities, in most cases through the recycling of old projects, already variously and widely rejected (or at least set aside) precisely because of the strong impact on the environment.

In addition to the lack of targeted investments, there is also a lack of integration of biodiversity conservation into the other components of the Plan, including investments under Mission 2. The total absence of an ecosystem approach, in favour of a purely technological approach, can be seen in particular in the investments dedicated to agriculture under objective M2C1.2 DEVELOPING A SUSTAINABLE AGRICULTURAL SYSTEM. The investments described are in fact exclusively technological and infrastructural, and although reference is made several times to the European strategy 'from producer to consumer', the model, which promotes an agro-ecological system, is completely ignored. In particular, it is necessary to point out to the serious lack of investments related to organic farming and the implementation of natural systems of agricultural environments, which are essential to ensure the long-term sustainability of the agri-food system.

The absence of biodiversity actions is also evident in the focus on Small Islands, to which investment '3.1 of Objective M2C1: Green Islands' is dedicated. In this context, funds are exclusively allocated to climate, even though the small islands represent essential and unrepeatable places for the conservation of migratory fauna, as demonstrated by countless scientific studies and the many years of monitoring carried out by Ispra through ringing of birds for scientific purposes. In this way, an important opportunity to integrate biodiversity conservation and the fight against climate change is completely missed.

The absence of concrete actions to restore biodiversity, the lack of a nature-based solution approach in the other components of the Plan, together with the desire to simplify environmental assessment procedures (repeated throughout the NRRP) all jeopardise the possibility of achieving European biodiversity objectives and indeed risk worsening the state of nature both at national and EU level, given Italy's responsibility for the conservation of various habitats and species at European level. This is why it is, as it stands, impossible to say that the current NRRP proposal will lead to a real ecological transition for our country.

3) Absence of Natura 2000 network.

The absence of the Natura 2000 network from the NRRP is striking. In no programme, project or section of the NRRP is Natura 2000 included or even mentioned.

Investment '3.1 of objective M2C4', which refers to the protection of green spaces (including suburban ones) and, at least as a 'declaration of intent', to the conservation of biodiversity, does not mention or concern Natura 2000 in any way. As for the minimal actions on biodiversity described in investment 3.2, they are

almost exclusively limited to monitoring (probably technological/digital) in the National Parks and a partial restoration of the "marine and coastal systems", again without mentioning and including Natura 2000.

In essence, it is as if Natura 2000 literally did not exist.

The recovery of our country would therefore take place ignoring the most important EU instrument for the conservation of biodiversity, which is at the heart of the European Biodiversity Strategy for 2030 and at the heart of the activities indicated by the European Commission as crucial to halting the decline of biodiversity in Europe and "bringing nature back into our lives".

This is all the more paradoxical given that many regions have already provided themselves with a detailed financial plan on the actions needed to implement the Natura 2000 network, the so-called Prioritised Action Framework (PAF) required by the European Commission (such as restoring wetlands hosting habitats and species of Community interest to a favourable conservation status).

The total absence of Natura 2000 from the PNRR is the most striking aspect, in negative terms, of the Plan's profound weakness in terms of nature. This is tantamount to a slap in the face of the most important EU nature legislation, and which in itself deadens the "green" claim of the NRRP.

4) Insufficient budget and inconsistent with EU rules.

Table 1.1 'COMPOSITION OF THE NRP BY MISSIONS AND COMPONENTS' shows that only 31% of the NRP funds (amounting to €191.50 billion) are allocated to Mission M2 'GREEN REVOLUTION AND ECOLOGICAL TRANSITION'. This percentage drops to 29.7% if React EU and Complementary Fund resources are also included (bringing the total to EUR 235.14 billion). In both cases the figure of 37% required by the European Commission as a minimum threshold for ecological transition is far from being met.

This ecological shortfall includes the allocation of resources to measures to protect biodiversity. Based on an estimate of the NRRP's Measures and Resources Frameworks, investments of 1.19 billion are earmarked for biodiversity conservation measures, i.e. 0.62% of total NRRP resources. This percentage drops to 0.51% if React EU resources and the Supplementary Fund are also taken into account. These interventions refer to: Investment 3.1 "Protection and enhancement of urban and suburban green areas", Investment 3.2 "Digitisation of national parks", Investment 3.3 "Renaturation of the Po area", Investment 3.5 "Restoration and protection of the seabed and marine habitats".

The total figure rises to 1.83 billion, equal to 0.95% or 0.78%, if investment programmes that directly or indirectly mention/refer to the term 'biodiversity' are included in the resources for biodiversity, and which also appear totally incongruous (see Investment 2.3 'Programmes to enhance the identity of places: historic parks and gardens' and Investment 3.2 'Green communities'), as well as the Horizon Europe programme under Investment 2.2 'Partnerships - Horizon Europe', which supports development and innovation projects.

For example, Spain has earmarked € 1.642 billion out of the Fund's € 69.528 billion for restoration of ecosystems and biodiversity. Moreover, Spain has allocated € 2,1 billion to coastal protection and water resources, totalling € 3,7 billion (roughly 5.37% of the total amount available in the plan), a tenfold amount

when compared to Italy. These funds are allocated to very concrete and strategic activities in favour of biodiversity.

5) Weakening of standards for land protection and civil society participation.

The grey character of the Plan is aggravated by the mentioned regulatory "simplification" that will follow the NRRP with the announced Simplification Decree.

In particular, it is worrying that in the chapter " NRRP Reforms", among the "bureaucratic constraints" and administrative "bottlenecks", the greatest emphasis is placed on the EIA - Environmental Impact Assessment, both national and regional, which is the main tool available to administrations to ensure compliance with the "do no significant harm principle".

This concern is unfortunately reflected in the fact that the Simplification Decree, in the light of detailed anticipations by the Government, will act on the rules for the protection of the natural territory with the aim of, precisely, simplifying them and speeding up the authorisation process for grey infrastructures.

An example: in the proposal of the Piedmont Region for contribution to the NRRP there is a series of investment proposals related to the interventions provided for within the infrastructure plan called "Approaching the Mountains", which provides for the construction of an area for winter sports (ski lifts, downhill slopes, infrastructure corridors, snow basins) and summer sports (mountain biking) that will affect the SPA and SPA IT1140016 Alpi Veglia e Devero - Monte Giove.

On 26 February 2018, the SEA procedure of the Plan "Approaching the Mountains" was opened, but since then everything is stopped at the Scoping stage due to some environmental criticalities that have emerged. Although in the Piedmont proposal to the NRRP the various interventions were presented as separate projects, they are exactly those that make up the complex infrastructure system of "Approaching the Mountains", the unification of which will have the consequence of avoiding the necessary cumulative assessment within the SEA procedure (including the assessment of impacts).

The simplification of environmental assessments (in particular of the EIA, which in Natura 2000 sites includes the assessment of impacts) will lead to the construction of a vast system of infrastructure, scattered throughout the Italian territory. This will happen without a strategic basis and without an assessment of the cumulative impact, derogating from the evaluation and stakeholder involvement processes that, to date, have ensured the protection of an important part of the country's natural heritage.

Moreover, while the Decree Law on Simplifications is expected to be approved as early as May 2021, and converted into law by mid-July, the work of digitising procedures and improving administrative performance will take much longer (from 2021 to 2026), thus opening a long period of assessment simplifications in the absence of the tools to guarantee the quality of environmental assessments, transparency and citizen participation. This would also entail the high risk of an increase in appeals and legal proceedings, the reduction of which is one of the objectives of the NRP.

It is worth mentioning that the European Commission has recently initiated infringement procedure no. 2019/2308, concerning the incorrect transposition of Directive 2011/92/EU and EU Pilot 6730/2014/ENVI on Impact Assessment.

6) Non-compliance with the "Do no harm principle".

The measures described or anticipated in the NRRP translate into a wave of infrastructures, including roads, high-speed railways, but also infrastructures for the production of renewable energy on a vast scale, and even - as mentioned - new facilities for Alpine skiing, which will further erode and fragment the Italian territory, with a very significant impact on the conservation of ecosystems and natural capital.

This impact, all the more so in the oft-cited hypothesis of the weakening of safeguard constraints and respect for environmental assessment procedures, will undermine the 'do no significant harm principle', which is one of the formal conditions for the proper use of European funds and fundamental for a real Italian and European ecological transition.

In the light of these observations

Without going into more systemic considerations on the philosophy behind the plan, which is entirely based on the logic of growth (of energy, infrastructure and construction), it is clear that the NRRP - National Recovery and Resilience Plan prepared by the Italian government presents serious problems with regard to biodiversity and natural capital. It is in violation of the formal conditions laid down by European regulations and, not least, in violation of the very substance of the RRF regulation, which sees in the green transition (including biodiversity) a key feature of the European Union's recovery under the banner of the Green Deal.

For these reasons we request the following.

- The budget earmarked for the Ecological Transition Mission must be increased to at least 37% of total resources, and resources equal to at least 2.5% of the total budget are allocated to the restoration and conservation of biodiversity.
- Investment in biodiversity in protected areas on land (National Parks) and at sea (Marine Protected Areas) should be extended to the Natura 2000 network, i.e. to SPAs (Special Protection Areas) and SCIs/SCAs (Special Areas of Conservation), as the primary programmatic and planning area for the restoration and conservation of biodiversity, also in relation to the 2030 European Biodiversity Strategy, with a significant increase in the resources specifically allocated.
- This action, moreover, is to be separated from that relating to digitalisation (3.2) and included more coherently in Investment '3.1 of Objective M2C4', to be called Conservation of biodiversity and protection and enhancement of urban and suburban green areas.

- In the Ecological Transition Mission, an extensive restoration of ecosystems, starting with wetlands, should be included, with an appropriate economic allocation, in relation to the European Biodiversity Strategy 2030 and in particular the nature restoration objective included therein.
- The Plan should make it explicitly clear that environmental protection regulations and procedures, especially those relating to nature conservation, will not be affected by the Simplification Decree and that these regulations and procedures will not be weakened in any way.
- The Plan should provide that the installation of renewable energy plants, such as onshore and offshore wind farms and onshore photovoltaic plants, should take place on the basis of careful planning that respects biodiversity and the landscape, through the identification of suitable and unsuitable areas and the criteria for the construction of the plants.
- The Plan should explicitly clarify that the principle of "Do Not Significant Harm" (DNSH) is the sine qua non of every structural and infrastructural project implemented. This is in line with the European Regulation for the management of funds and goes beyond the generic statement, currently contained in the Plan, that "indirect environmental impacts have been assessed and their magnitude minimised in line with the principle of "not causing significant damage" to the environment".

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