

Youth Position on EU Nature Restoration Regulation

MARCH 2023

This paper presents the youth position on the EU Nature Restoration Regulation of the NGOs representing more than 20 million young Europeans - Generation Climate Europe, Youth and Environment Europe (YEE), Biodiversity Action Europe (BAE), the Global Youth Biodiversity Network Europe (GYBN Europe), and the European Young Rewilders (EYR)

GENERATION CLIMATE EUROPE



**Generation
Climate
Europe**



**YOUTH AND
ENVIRONMENT
EUROPE**

**Biodiversity
Action
Europe**



**Global Youth
Biodiversity
Network Europe**



**EUROPEAN
YOUNG
REWILDERS**

Introduction

Generation Climate Europe is the largest European coalition of youth-led networks on climate and environmental issues. Together with Youth and Environment Europe (YEE), Biodiversity Action Europe (BAE), the Global Youth Biodiversity Network Europe (GYBN Europe), and the European Young Rewilders (EYR), we represent more than 20 million young Europeans in the advocacy for an ambitious restoration law. We believe that **young people play a crucial role in nature restoration and should be empowered to act**. Not only does nature restoration depend on the effective involvement of young people, but our futures also depend on restoring nature. Nature restoration is a youth issue, and youth are central to championing nature restoration.

We strongly support the [proposal](#) of a new EU Nature Restoration Regulation and appreciate its overall ambition. The proposal for a Nature Restoration Regulation, published by the European Commission on 22 June 2022, is an important opportunity to restore Europe's degraded landscapes and seascapes, including forest, wetland, river, marine, agricultural, and urban ecosystems.

However, **the proposed law does not go far enough to include young people and does not respect the principle of intergenerational equity**. We young people have the drive, knowledge and skills needed to restore nature. Yet, the proposed Nature Restoration Regulation does not currently mention young people. Our recent survey revealed that European youth **is significantly concerned regarding the exclusion of youth in the Nature Restoration Regulation**[1].



Key demands

In November 2021, ahead of the publication of the EU Nature Restoration Law, this same coalition of youth organisations led by GCE published the [Youth Position on EU Nature Restoration Law](#). **We asked for a strong, urgent, and ambitious law that fully and genuinely includes youth and contributes to intergenerational equity.** This statement included 3 crucial demands:

1. Genuine and full stakeholder and youth engagement
2. Policy consistency (coherence, additionality, and linearity)
3. Funds and subsidies aligned with biodiversity and youth

Now that the Commission has published its proposal, we take stock of these demands, and express our disappointment that they have not been met. Our full analysis, available in Annex I, clearly shows that the law does not include the role of youth and the importance of youth participation and still places too much of the burden of action on the current and future generations. For these reasons, we return with 3 renewed key demands to emphasise the pivotal role of youth in future restorative action in the EU and beyond:

3 RENEWED KEY DEMANDS

1. Youth must be explicitly recognized as an important stakeholder;
2. The Regulation must ensure that youth is given early and effective opportunities to participate in developing national restoration plans;
3. The Regulation must respect the principle of intergenerational equity by ensuring that meaningful action is taken before 2030.



DEMAND 1: Youth must be explicitly recognized and mentioned as an important stakeholder

Youth must be explicitly mentioned in the law, and its role in nature restoration must be recognised, in line with the principles of intergenerational equity and to ensure policy coherence with the [EU Youth Strategy](#).

Young people are not only stakeholders but also **rightholders** in the context of environmental action, protection and restoration. While other stakeholders are acknowledged in the proposal (farmers, point 51, and businesses, point 74), **youth remains overlooked, despite our future being at stake and a right.**

To fully recognise the crucial role that young people can play in enabling and implementing restorative measures, youth must be mentioned in the law and its importance highlighted. Just recently, the new Kunming-Montreal Global Biodiversity Framework was adopted with explicit recognition of the role of youth (target 22) and of **intergenerational equity as one of the guiding principles** (Section C, para 21). We urge such concepts to be acknowledged and included in this law too. Additionally, as recognised by the [UN Decade on Nature Restoration Youth Task Force](#), young people are vital to ensuring restoration action is sustainable and intergenerationally just.

The acknowledgement of youth in the law, and therefore in nature restoration on the ground, will contribute to achieving many of the 11 European Youth Goals established by the EU, for instance, Space and Participation for All, Sustainable Green Europe, Mental Health & Wellbeing, Moving Rural Youth Forward, just to name a few.

We note that one of the amendments proposed in the [draft report](#) presented to the European Parliament's Committee on the Environment, Public Health and Food Safety does mention young people, reciting that: "*Member States should also actively promote awareness of the importance of biodiversity and nature restoration and engage with young people through programmes and concrete projects and through education and general information[2]*". **Mentioning young people should go beyond education and awareness raising.** Young people are already generally well-informed on nature issues, actively disseminating information, raising awareness, and taking leadership in non-formal education. **The importance of the role of youth in nature restoration lies, above all, in their knowledge, skills and experience.**

DEMAND 2: The Regulation must ensure that youth are given early and effective opportunities to participate in the development of the national restoration plans.

Youth involvement in National Restoration Plans must be ensured by strengthening the textual references and opportunities for youth, such as envisioning targeted consultations for young people in addition to public ones. Youth often find it challenging to meaningfully make their voices heard in such contexts. This lack of accessibility is often due to many young people not having had a long enough career to gain as much experience in the issue and the procedure of the consultations as other representatives from civil society. Youth often also have another occupation than their engagement in EU policy, such as the Nature Restoration Law, and thus are not able to participate during large parts of the workday, when consultations often happen.

In contrast, young people and future generations will **disproportionately suffer** the consequences of current inaction in solving the climate and biodiversity crises. Hence, they constitute part of the “most affected” stakeholders according to Directive 2001/42/EC. Young people not only have the highest stakes in the fight against environmental threats but can also be part of the solution if adequately empowered and included.

The current language around engagement is weak, and relying only on the general obligations of the Member States is insufficient. Mentioning youth more thoughtfully and structurally will push Member States to genuinely engage youth in nature restoration activities.

There are easy opportunities to include youth in the regulation, ensuring its involvement in the preparation of national restoration plans (Article 11) but also its effective participation and inclusion through the national plans (Article 12).



DEMAND 3: The Regulation must respect the principle of intergenerational equity by ensuring that most action is taken before 2030.

Most necessary restoration actions should already happen before 2030. In the current proposal, the bulk of actions is planned for beyond 2040. This is not aligned with the urgency of the crisis nor with principles of intergenerational justice, since **the burden of efforts is shifted to current young people and future generations**. In the climate context, such a shifting of the burden towards future generations has been deemed to be an unjust interference with their freedoms[3].

There are many ways in which quick and intergenerationally fair action can be ensured.

To begin with, we urge the Council of the EU and the European Parliament not to delay the adoption of the EU Nature Restoration Regulation and strengthen it as recommended in the [NGOs analysis](#) by BirdLife, ClientEarth, EEB and WWF, which we fully endorse. We believe that the deadlines of the restoration targets should be brought forward, to reach **100% of the targets by 2035**.

Alongside this demand, **we support the inclusion of a strong principle of non-deterioration**. We want to guarantee that ecosystems that have been restored will be healthy and functioning for future generations, To achieve this, it's essential to ensure their non-deterioration. Letting ecosystems deteriorate again once they have been restored would be a waste of money and energy, requiring young people and future generations to start again, further increasing their burden. The principle must also guarantee that ecosystems that have not been restored yet are not further degraded and that no degradation occurs in those in good shape.

Moreover, **the youth supports rewilding as a key restoration measure** to drive fast recovery of damaged ecosystems and restoration of degraded landscapes. Rewilding, focusing on enabling and restoring natural processes to establish a healthy and resilient ecosystem, lets nature lead, trusting its forces to shape land and seas. Rewilding is a huge opportunity to facilitate an earlier fulfilment of the objectives and long-term recovery, allowing future generations to benefit from a restored environment sooner and for longer.

Annex I

Demand	Assessment
<p>Genuine and full stakeholders and youth engagement</p>	<p>This demand has not been met.</p> <p>Although we welcome that the proposal requires Member States to ensure that the preparation of national restoration plans is open, inclusive, and effective, we do not believe it meets our demand for genuine stakeholder and youth engagement.</p> <p>The language requiring stakeholder engagement in national restoration planning is not ambitious enough. There are no requirements to include key rights- and stakeholders such as youth, Indigenous peoples, and local communities. Moreover, meaningful engagement is not promoted at all stages of decision-making from the design of restoration plans to the implementation and monitoring of activities. The proposal even does not mention youth at all thus failing to recognise its crucial role in nature restoration action.</p>
<p>Policy consistency (coherence, additionality, linearity)</p>	<p>This demand has only been partially met.</p> <p>We welcome that the preparation of national restoration plans will require the consideration of obligations under other relevant policy areas and that dedicated sections of the plans must consider the potential of restoration measures to contribute to climate mitigation and adaptation, as well as wider co-benefits. We also welcome that the targets outlined in the proposal are additional to obligations under existing EU nature law.</p> <p>However, we believe that the proposal does not meet our demand for coherence with the EU position on the role of youth. Despite the synergies between nature restoration and achieving the 11 European youth goals outlined in the EU Youth Strategy 2019-2027, the proposal does not create a link with the EU Youth Strategy. Member States are not required to consider national activity planners under the EU Youth Strategy in their design of national restoration plans or the potential of the EU Youth dialogue, EU youth strategy platform, and EU Youth coordinator in their implementation.</p> <p>The proposal also falls short of our demands for ambitions to ensure that restoration efforts are distributed fairly over time. As it stands, most restoration action is expected to take place beyond 2040 which risks shifting the burden to younger generations while exacerbating the impacts of the biodiversity crisis on future generations.</p> <p>We further regret that the proposal does not ensure implementable marine targets as it fails to address the deadlock of the Common Fisheries Policy.</p>

Annex I

Demand	Assessment
Funds and subsidies aligned with biodiversity and youth	<p>This demand has not been met.</p> <p>Our demand for funding to be made accessible and usable for youth has not been met. Although the proposal highlights the importance of adequate investment from EU, national, and private sources, it does not emphasise the need to ensure the accessibility of funding. The EU has committed to track EU spending on youth and on biodiversity under the EU Youth Strategy and EU Biodiversity Strategy respectively. The proposal currently does not capitalise on the opportunity to promote spending which delivers for both youth and nature restoration.</p>

Annex II

Annex II – suggested amendments:

DEMAND 1: Youth must be explicitly mentioned in the EU Nature Restoration Regulation

<p><i>Amendment 1</i> Proposal for a regulation Recital 79 (new) Text proposed by the Commission and amended in the Draft Report</p>	<p>Our amendment proposal:</p>
	<p>(79) The effective inclusion of young people in nature restoration is critically important. Young people will disproportionately suffer from continued biodiversity loss making nature restoration a key issue for intergenerational equity. Young people hold vital knowledge and skills needed to achieve successful nature restoration. To ensure coherence between the EU Youth Strategy, the new Global Biodiversity Framework, and this Regulation, it is essential to recognise the role of youth in nature restoration, both in enabling and implementing restorative measures as they are both a stakeholder and a rightholder in the context of environmental action.</p>

Annex II

DEMAND 2: The Regulation must ensure that youth is given early and effective opportunities to participate in the elaboration of the national restoration plans.

*Textual proposals (in bold and underlined):
Amendment proposal, Article 11 (11)*

<p><i>Amendment 2</i></p> <p>Proposal for a regulation Article 11 – paragraph 11</p> <p>Text proposed by the Commission and amended in the Draft Report</p>	<p>Our amendment proposal:</p>
<p>11. Member States shall ensure that the preparation of the restoration plan is open, transparent, inclusive and effective and that the public is given early and effective opportunities to participate in its elaboration. Consultations shall comply with the requirements set out in Articles 4 to 10 of Directive 2001/42/EC.</p>	<p>11. Member States shall ensure that the preparation of the restoration plan is open, transparent, inclusive and effective and that the public, especially the most affected stakeholders and right-holders, including youth according to Directive 2001/42/EC, is given early and effective opportunities to participate in its elaboration. Consultations shall comply with the requirements set out in Articles 4 to 10 of Directive 2001/42/EC.</p>

Amendment proposal, Article 12

<p>Amendment 3</p> <p>Proposal for a regulation Article 12 – paragraph 2 – point n</p> <p>Text proposed by the Commission and amended in the Draft Report</p>	<p>Our amendment proposal:</p>
<p>(n) a summary of the process for preparing and establishing the national restoration plan, including information on public participation and of how the needs of local communities and stakeholders have been considered;</p>	<p>(n) a summary of the process for preparing and establishing the national restoration plan, including information on public participation and of how the needs of local communities, right holders and stakeholders, such as youth, indigenous and local communities, have been considered</p>

Annex II

<p><i>Amendment 4</i></p> <p>Proposal for a regulation</p> <p>Article 12 – paragraph 2 – point p</p> <p>(new)</p> <p>Text proposed by the Commission and amended in the Draft Report</p>	<p>Our amendment proposal:</p>
	<p>(p) a dedicated section indicating how the national restoration plan ensures the inclusion and participation of stakeholders and right holders, including youth, in its implementation, monitoring, and evaluation. For instance through jobs, internships, regular consultation...</p>

Endnotes

[1] The Survey on the Nature Restoration Law was conducted between the 11th of October and the 16th of December 2022 and disseminated via GCE social media channels. It recorded the opinions of 146 young people from 34 countries. 92% of participants indicated that youth should be clearly named as a stakeholder/rightholder in the Nature Restoration Regulation, while at the same time 73% of respondents do not feel heard by European institutions. Regarding the level of ambition of the Nature Restoration Regulation, respectively 4% and 21% of the participants strongly disagree and disagree with the fact that the text is ambitious enough, while 27% remain neutral, 36% agree and 12% strongly agree.

[2] Amendment 37

[3] See the German case law: BVerfG, Order of the First Senate of 24 March 2021 - 1 BvR 2656/18 -, paras. 1-270

