

# FACE AND THE NO NET LOSS INITIATIVE

## WHAT IS NO NET LOSS?

Recent evidence shows that only 23 percent of species and 16 percent of habitats protected under the Habitats Directive have a favourable status. Further, only 52 percent of birds in the European Union have a secure status ([EEA, 2015](#)). The loss of biodiversity is also a major issue in non-EU countries.

The No Net Loss (NNL) [principle](#) is based on the assumption “that conservation/biodiversity losses in one geographically or otherwise defined area are balanced by a gain elsewhere provided that this principle does not entail any impairment of existing biodiversity as protected by EU nature legislation<sup>1</sup>”.

Currently, the NNL initiative is part of the **European Biodiversity Strategy to 2020** (Target 2) to avoid the loss of ecosystems and their services by 2020. Four policy package scenarios have been developed to support NNL:

- A. Better enforcement and implementation of existing measures, and encouragement of voluntary offsetting;
- B. New and enhanced measures to avoid and reduce impacts, and mandatory offsetting for residual impacts from EU funded developments;
- C. Development of a policy framework with mandatory NNL objectives for scarce biodiversity and priority ecosystem services and minimum key standards for offsetting at the EU level;
- D. Development of a policy framework for NNL with mandatory NNL objectives and key implementation standards for all biodiversity and ecosystem services.

The **mitigation hierarchy**, which helps to prioritise actions when planning and implementing projects entails: **Avoiding** and **minimising** human impacts on biodiversity are the first two priorities of the hierarchy. Measures should be then taken to **restore** ecosystems where impacts could not be avoided or minimised. Finally, any residual impact should be **compensated** through offsetting in order to achieve NNL.

Respecting this succession of steps is important to prevent significant environmental damage by achieving no net loss of biodiversity, and their thorough application could result in a net gain of biodiversity from human activities. Each step is necessary to ensure environmental damage is prevented; skipping one or more steps could result in increased costs and poorer mitigation leading to a net loss of biodiversity. Adhering to the NNL principle could bring benefits from increases in nature-based tourism and hunting that would benefit a range of rural businesses such as those providing accommodation, food, transport and specialist guiding services etc. ([IEEP, 2016](#)).

## FACE POSITION ON NNL:

Hunters can play an important [role](#) in the implementation of NNL as they have an interest in maintaining favourable ecological conditions that support huntable species and preventing loss of or damage to ecosystems (e.g. via controlling ungulates populations and invasive alien species). Through management and restoration activities of habitats and species, hunters often positively counter-balance negative human impacts (see [FACE BDM](#)). In this context, hunting contributes to NNL. Going forward, FACE supports the following points:

1. Some existing mechanisms support NNL (e.g. in Natura 2000 sites), however, there is a need to devise new mechanisms to ensure that developments, which could have a significant negative impact on biodiversity in the wider countryside, are incorporated into NNL.
  - A SWOT analysis of existing EU legislation should be undertaken with the aim of advancing a new regulatory approach to implement the NNL principle.
2. The mitigation hierarchy should be respected and offsetting measures should be used as a last resort.
3. Mechanisms that support NNL should recognise activities and stakeholders that deliver biodiversity benefits, in particular, those that provide cultural ecosystem services.
4. With regard to offsetting measures, FACE would like to see all species and habitats incorporated into assessments that support NNL and not only those habitats and species of EU interest.
5. Greater awareness about NNL should be targeted at land managers to encourage incentive-driven conservation in line with NNL.

<sup>1</sup> EU Council conclusions on 21 June 2011.

