Society for Conservation Biology
A global community of conservation professionals
Europe Section

Mr. Frans Timmermans
Executive Vice President
European Commission
B-1049 Brussels, Belgium
2021-03-26

Dear Vice President Mr. Timmermans,
The Society for Conservation Biology (SCB) is an international organization of scientists and conservation professionals dedicated to advancing the science of maintenance and restoration of biological diversity, with direct links to implementation in policy and practice. The Europe Section (SCB-ES) represents conservation professionals from all the 27 EU Member States and beyond.

On behalf of the Section, we would like to draw your attention to the impact of roads causing habitat fragmentation in Europe and urge the Commission to **adopt a roadless policy, by integrating a fragmentation minimization intervention in the implementation of the EU's biodiversity strategy**[1] **and 8th Environment Action Programme to 2030**[2]**. Accordingly, this needs to be included in all concerned sectoral policies, also in the framework of the European Green Deal**.

Scientific evidence underlines that roads have serious negative impacts on biological diversity and ecosystem functioning, with road sprawl standing as a key driver of the top threats to biodiversity at global and European scales: land use change and loss of natural habitats, natural resource extraction, pollution, barrier effects to natural mobility and population-connectivity of species (cf. Article 10 of the Habitats Directive), climate change and invasive alien species[3-4]. The construction of new roads is an action of land take (conversion of natural habitats to artificial surfaces) that fragments and degrades habitats. Europe is the most fragmented continent of the world[3], yet no legally binding measures have so far been implemented to achieve the "no net land take" target by 2050[5]**,** resulting in increasing imperviousness[6] and fragmentation[7] levels. Roadless areas are one of the most efficient and cost-effective policies for conserving biodiversity and increasing ecosystem resilience.

Noting that the EU continues to lose biodiversity at alarming rates[8], **we express serious science-based concerns about the ongoing and anticipated rapid increase of new access roads associated with renewable infrastructure development** towards climate neutrality**, particularly for increased wind-based energy** and the associated roads' serious impacts on biodiversity[9], ecosystem resilience and local climates. We fully concur with the conclusions of the recent IUCN report[10] highlighting that poorly located renewable energy projects, together with their associated infrastructure, such as access roads and powerlines, can lead to significant additional loss and fragmentation of natural habitat. Negatively

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1 EU Biodiversity Strategy to 2030 incl. Council conclusions https://www.consilium.europa.eu/en/meetings/env/2020/10/23/

2 EU Environment Action Programme to 2030 https://ec.europa.eu/environment/strategy/environment-action-programme-2030_en

3 Ibisch P. et al. 2016. Science. https://doi.org/10.1126/science.aaf7166 ,

4 Laurance W.F.et al. 2014. Nature. https://doi.org/10.1038/nature13717

5 EC 2011. https://www.europarl.europa.eu/meetdocs/2009_2014/documents/com/com_com(2011)0571_/com_com(2011)0571_en.pdf

6 EEA. 2020. https://www.eea.europa.eu/data-and-maps/indicators/imperviousness-change-2/assessment

7 EEA 2019. https://www.eea.europa.eu/data-and-maps/indicators/mobility-and-urbanisation-pressure-on-ecosystems-2/assessment

8 EEA, 2019. https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/state-of-nature-2020

9 Kati V et al. 2020. Biological Conservation. https://doi.org/10.1016/j.biocon.2020.108828

10 IUCN 2021. https://portals.iucn.org/library/node/49283

impacting biodiversity to combat climate changes is a critical nexus that especially affects European countries with great natural capital[11-12]. Such conflicts between sectors counteract successful policy implementation, which the overarching EU Environment Action Programme to 2030 is meant to achieve through policy coherence.

We therefore urge you in the role as Vice-President and "policy-coherence achiever", and the Commission to:

a. consider roadless areas as a criterion for expanding the Trans-European Nature Network and designate strictly protected areas within it, in the process of implementing the European Biodiversity Strategy (target 2.2.1)
b. include roadless areas in the forthcoming legally binding targets of ecosystem restoration, as a cost-effective proactive restoration tool, in the process of implementing the European Biodiversity Strategy (target 2.2.3)
c. integrate road sprawl monitoring and roadless areas as measures associated with the 8th Environment Action Programme
d. foster the implementation of the "no net land take by 2050" milestone in legally binding terms, including compensation measures, and integrate fragmentation minimization from road sprawl in all relevant sectoral policies, such as transport and renewables
e. adopt the conclusions of the IUCN report[9] and encourage Member States without adequate Strategic Environmental Planning for Renewables to select potential project sites focusing on already fragmented areas of low biodiversity sensitivity
f. take international leadership in the CBD post-2020 GBF and actions, consider initiating roadless areas conservation in the **new 2030 targets**, in the forthcoming SBSTTA and COP meetings

Furthermore, the recent COVID-19 pandemic pinpoints the urgency of giving nature the space it needs, as human health and ecosystem health are interlinked. Besides the large benefits for human health, biodiversity and ecosystem resilience, a roadless policy contributes to the Sustainable Development Goals and to the protection of European landscapes, as a basic component of the European natural, social and cultural heritage[13]. These points were raised in a webinar organized by the SCB-ES in January of 2021, including DG ENV attendees, and that can be watched here.

We thank you for your attention to this issue of European and global importance and are willing to help with science-based input to achieve the policy coherence and environmental targets and goals to save and strengthen the European Union's natural capital under climate change.

Sincerely,

Dr John Piccolo, President
on behalf of SCB Europe Section Board

Dr Laura Bosco, Vice Chair
SCB-ES Policy Committee

11 Serrano D. et al. 2020. Science. http://doi.org/10.1126/science.abf6509

12 Kati V et al. 2021. Science of the Total Environment. https://doi.org/10.1016/j.scitotenv.2020.144471

13 Council of Europe 2000. https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/176