



**Contribution to the 17th Conference of the Parties (COP17) to the UN Convention on Biological Diversity (CBD) and the first Global Review of Implementation of the Kunming-Montreal Global Biodiversity Framework (GBF)**

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Contents

- 1. **Executive summary** .....1
- 2. **Introduction** .....2
- 3. **Key messages and recommendations** .....3
  - 3.1 **Implementation and monitoring: from commitments to delivery** .....3
  - 3.2 **Data, transparency and accountability** .....4
  - 3.3 **Governance and the role of organised civil society** .....4
- 4. **Qualitative assessment of the NBSAPs submitted by the EU and its Member States** .....5
  - 4.1 **The EU NBSAP: ambition and structural constraints** .....5
  - 4.2 **The comparative ambition of NBSAPs from EU Member States** .....6
  - 4.3 **The role of organised civil society** .....7
  - 4.4 **Monitoring, indicators and accountability** .....8
  - 4.5 **Financing and political will** .....9
  - 4.6 **Overall assessment and COP17 implications** .....9
- 5. **Annex I: References**.....11
- 6. **Annex II: Acknowledgments**.....11



## 1. Executive summary

The adoption of the Kunming-Montreal Global Biodiversity Framework (GBF) at COP15 to the UN Convention on Biological Diversity (CBD) in December 2022 marked a major step forward in global biodiversity governance. The framework sets the objective of halting and reversing biodiversity loss by 2030 and achieving the 2050 vision of living in harmony with nature. The first Global Review, to be conducted at COP17, will be a crucial moment to assess collective progress, identify gaps in implementation and strengthen accountability mechanisms.

This EESC's contribution provides **key messages based on recently adopted EESC's opinions (see full list of references in Annex I), complemented by stakeholders' views collected during a dedicated hearing organised in the context of the EESC Permanent Group on COP in April 2026 and a desk-level qualitative assessment** of the National Biodiversity Strategies and Action Plans (NBSAPs) submitted by the EU and its Member States. By examining NBSAPs as strategic instruments guiding national commitments and implementation approaches, this assessment offers additional insights into the degree of ambition, internal consistency of policies and the capacity of Parties to effectively implement the GBF targets. Likewise, particular attention is paid to **implementation mechanisms, monitoring and reporting systems, governance structures and the role of organised civil society.**

The assessment shows that, to date, in addition to the EU **only eighteen Member States have submitted their NBSAPs and nineteen their national reports.** At the same time, while there is a high level of formal alignment between EU and national strategies and the GBF targets, this does not automatically translate into effective implementation. In many cases, **implementation frameworks are not embedded in sectoral policies and lack clear responsibilities, binding timelines and adequate financial resources,** which creates a gap between political commitments and concrete delivery. **Monitoring and reporting systems have improved** compared to previous biodiversity policy cycles, but important challenges remain. **Indicators are not always sufficiently clear,** measurable or fully aligned with the global monitoring framework, and data gaps and limited interoperability between national and EU systems continue to hinder the assessment of progress. Reliable, accessible and comparable data are essential for an effective Global Review and for ensuring transparency and accountability and the assessment of impacts across generations.

**Policy coherence** and the need to integrate and pursue biodiversity objectives across all relevant sectors, including agriculture, fisheries, forestry, energy, transport and finance are needed. The **circular economy and the transition towards a sustainable and wellbeing economy** within planetary boundaries are key enablers for achieving biodiversity and climate objectives.

In addition, **although organised civil society is widely recognised as an important stakeholder, its role in implementation and monitoring remains insufficiently defined and institutionalised.** Participation is often limited to consultation during the preparation of strategies, with fewer opportunities for structured involvement during implementation and follow-up. **Strengthening the role of organised civil society is essential to improve the effectiveness, legitimacy and social ownership of biodiversity policy coherence across sectors; better data and transparency frameworks; transformation and alignment of their policies and incentive systems with the**

**targets of the GBF; and more inclusive and participatory governance systems.** In particular, the meaningful involvement of organised civil society at all levels is a key condition for the successful implementation of the GBF.

The first Global Review should therefore not only assess progress in terms of targets and indicators, but also evaluate the effectiveness of governance systems, participation mechanisms and implementation frameworks. This will be essential to ensure that the GBF moves from commitments to concrete results.

In this context, **the EESC remains committed to facilitate a more active role for organised civil society, in particular farmers, fishers and forest owners, in the CBD processes and the implementation of the GBF.**

## 2. Introduction

Biodiversity conservation is widely recognised as a shared responsibility of humanity and an essential element for meeting fundamental human needs, as highlighted by the CBD. Biodiversity underpins human development, health and overall wellbeing, and forms a cornerstone of both social and economic prosperity. It is therefore not only vital for life on Earth but also a central pillar of sustainable development<sup>1</sup>, directly contributing to the achievement of the UN 2030 Agenda and its Sustainable Development Goals (SDGs).

The CBD promotes a long-term vision of ‘living in harmony with nature’, which envisages that by 2050 biodiversity will be properly valued, protected, restored and used responsibly. This vision emphasises the maintenance of a healthy planet and the preservation of ecosystem services. The convention is guided by three primary objectives: the conservation of biological diversity, the sustainable use of its components, and the fair and equitable sharing of benefits arising from the use of genetic resources<sup>2</sup>. These objectives are implemented primarily through NBSAPs, which countries are required to develop, update and implement in line with their national contexts, and through the integration of biodiversity considerations into other relevant sectoral policies.

One major milestone in global biodiversity policy was the adoption of the Kunming-Montreal Global Biodiversity Framework at CBD COP15 in December 2022. The framework sets ambitious global targets, including restoring 30% of degraded ecosystems and ensuring the effective protection and management of at least 30% of terrestrial, inland water, marine and coastal areas by 2030. Through its four goals and 23 action-oriented targets, the GBF provides a global roadmap for halting and reversing biodiversity loss by 2030 and achieving the 2050 vision of living in harmony with nature.

CBD COP17 will host the first global review, which will assess and discuss how to enhance collective progress towards the implementation of the GBF, including progress towards the 2030 targets and the 2050 vision, paying particular attention to national implementation, monitoring, reporting and review mechanisms. This first global review should entail comprehensive, constructive and open discussions

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<sup>1</sup> [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16.*

<sup>2</sup> [Article 1. Objectives](#) – Convention on Biological Diversity.

on the gaps identified and on targeted actions to fill them, based on the 7th national reports and the global report.

### 3. Key messages and recommendations

#### 3.1 Implementation and monitoring: from commitments to delivery

Environmental policies require solidarity and strong international cooperation. Despite the progress achieved under international environmental agreements in setting global targets, implementation has often remained inadequate due to a lack of political consensus on concrete measures and on fair burden sharing across institutional levels. This implementation gap jeopardises the planet's ecological resilience and, if not addressed, will pose significant socioeconomic challenges, placing a disproportionate burden on young people and future generations, particularly in the Global South<sup>3</sup>. The EESC underlines that political commitments and strategic frameworks must be translated into practical, coherent and enforceable action, backed by clear timelines, responsibilities and resources, if the biodiversity, health and sustainability objectives are to be credibly delivered. Ambition without delivery risks undermining trust and effectiveness<sup>4</sup>.

Effective implementation requires systemic, cross-sectoral and holistic approaches, ensuring consistency between environmental, health, agricultural, climate, trade and financial policies, and avoiding fragmented or siloed interventions that weaken overall impact<sup>5</sup>. This requires the active involvement of stakeholders on the ground, including farmers, fishers, economic operators, local communities, civil society organisations, young people and social partners, whose practices directly shape biodiversity outcomes. The circular economy should also be further embedded as a key framework for transformative change towards the sustainable use of natural resources and a wellbeing economy operating within planetary boundaries<sup>6</sup>. Circular approaches can generate environmental and socioeconomic benefits and act as enabling factors for the implementation of biodiversity and climate policies. For instance, practices such as regenerative agriculture, organic farming, sustainable fishery and aquaculture, and agroforestry can act as catalysts for positive biodiversity outcomes by integrating biodiversity into productive systems<sup>7</sup>.

The EESC stresses that robust monitoring, reporting and review mechanisms must accompany implementation from the outset, enabling continuous tracking of progress and early identification of gaps or unintended impacts, rather than ex post assessment alone<sup>8</sup>.

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<sup>3</sup> [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*.

<sup>4</sup> [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*; [NAT/947](#) – *Healthy planet for healthy people: towards a comprehensive 'One Health' approach*.

<sup>5</sup> [NAT/947](#) – *Healthy planet for healthy people: towards a comprehensive 'One Health' approach*.

<sup>6</sup> [NAT/927](#) – *A Blueprint for a European Green and Social Deal, based on a wellbeing economy*.

<sup>7</sup> [NAT/949](#) – *Future of organic and quality foods and how we can step up consumption*; [NAT/948](#) – *Regenerative agriculture as a target towards enhancing sustainable food production, supporting climate and biodiversity objectives*; [NAT/944](#) – *Civil society's vision for a European Oceans Pact*.

<sup>8</sup> [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*; [NAT/961](#) – *Roadmap towards Nature Credits*.

Public funding remains indispensable for delivering agreed commitments: innovative financing tools and private investment can complement action, but they cannot be a substitute for adequate, stable and timely public funding, nor can they justify weakening binding environmental and health standards. In particular, the EESC firmly calls for the accelerated and transparent phasing-out of environmentally harmful subsidies, as their persistence directly undermines biodiversity protection, climate action and One Health objectives. Redirecting public support towards nature-positive, health-promoting and sustainable practices is essential to ensure policy coherence, credibility and effective delivery of agreed commitments<sup>9</sup>.

### 3.2 Data, transparency and accountability

The EESC calls for transparent, evidence-based and outcome-oriented data systems, focusing on real impacts on ecosystems, health and society rather than on purely procedural or formal compliance indicators.

Comparable, high-quality and interoperable data are essential to ensure credible monitoring and evaluation, while allowing flexibility for national, regional and local specificities and avoiding unnecessary reporting burdens<sup>10</sup>.

Monitoring frameworks must be designed to support accountability and corrective action, ensuring that results feed back into policy adjustments, implementation improvements and enforcement where necessary, rather than remaining a reporting procedure without consequences<sup>11</sup>.

Where new incentive or financing mechanisms are deployed, the EESC insists on clear rules on data integrity, ownership, access and transparency, to uphold the rights of knowledge holders, including Indigenous peoples, to prevent greenwashing, speculation or misuse, and to safeguard public confidence<sup>12</sup>.

### 3.3 Governance and the role of organised civil society

The EESC consistently affirms that inclusive, participatory and transparent governance is a prerequisite for effective implementation and monitoring, recognising organised civil society as a key player in biodiversity policy design, delivery and oversight. It is crucial to build a positive narrative for biodiversity through strong civil society participation. This includes integrating the needs and concerns of all sectors, including agriculture, forestry and fisheries<sup>13</sup>. Governance frameworks must ensure fair and meaningful participation, paying particular attention to vulnerable and marginalised groups, and avoiding top-down approaches that risk social resistance or uneven implementation. In particular,

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<sup>9</sup> [NAT/946](#) – *Phasing out fossil fuel subsidies while ensuring European competitiveness, mitigating the cost-of-living crisis, and promoting a just transition*; [NAT/961](#) – *Roadmap towards Nature Credits*.

<sup>10</sup> [NAT/947](#) – *Healthy planet for healthy people: towards a comprehensive ‘One Health’ approach*; [NAT/961](#) – *Roadmap towards Nature Credits*.

<sup>11</sup> [NAT/947](#) – *Healthy planet for healthy people: towards a comprehensive ‘One Health’ approach*.

<sup>12</sup> [NAT/961](#) – *Roadmap towards Nature Credits*.

<sup>13</sup> [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*.

Indigenous peoples and local communities, women and girls, children and young people, and persons with disabilities should be more involved not only in consultation, but also in decision-making and as active contributors to implementation and monitoring, drawing on their expertise, local knowledge and capacity to mobilise action on the ground<sup>14</sup>.

The EESC stresses that participatory governance strengthens ownership, legitimacy, accountability and policy effectiveness, particularly in complex, cross-cutting frameworks such as biodiversity protection, One Health and nature-positive finance.

#### 4. Qualitative assessment of the NBSAPs submitted by the EU and its Member States

The GBF sets out 23 action-oriented targets to be implemented by Parties through updated NBSAPs. As both a CBD Party and a regional integration organisation with legislative competence in environment, the European Union occupies a distinctive position in GBF implementation. EU strategies, legislation and reporting frameworks coexist with the NBSAPs adopted by Member States, creating a multi-layered governance system whose effectiveness depends on consistency, ambition and participation across levels.

This contribution provides a desk assessment of how the EU and its Member States are contributing to the implementation of the GBF through their NBSAPs or equivalent instruments. It analyses the degree of ambition, the clarity of implementation frameworks, the robustness of monitoring and financing mechanisms, and the role of organised civil society. The assessment is grounded exclusively in official strategies submitted or adopted in 2026 and is intended as the basis for a constructive contribution by civil society to CBD COP17.

While national reports constitute the primary official input to the global review under the CBD, providing evidence on implementation and progress, this contribution focuses on NBSAPs as forward-looking strategic documents that shape national commitments and implementation frameworks. Assessing these strategies therefore provides complementary insights into the Parties' level of ambition and policy coherence, and their preparedness to deliver on the GBF targets.

##### 4.1 The EU NBSAP: ambition and structural constraints

At EU level, the Biodiversity Strategy for 2030 and the Nature Restoration Regulation, together with the other environmental legislation adopted under the European Green Deal<sup>15</sup>, making environmental governance mechanisms more robust, provide one of the most comprehensive regional responses to the GBF. These various pieces of EU legislation demonstrate clear alignment with all four long-term GBF goals and the majority of the 23 targets, particularly those relating to spatial planning, ecosystem restoration, protected areas, pollution reduction, sustainable agriculture and forestry, and biodiversity mainstreaming in economic sectors. The EU has also articulated an intention to strengthen monitoring,

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<sup>14</sup> [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*; [NAT/961](#) – *Roadmap towards Nature Credits*.

<sup>15</sup> [The Zero Pollution Action Plan](#), [the EU Forest Strategy for 2030](#), [the EU Water Resilience Strategy](#), [the European Ocean Pact](#), [the EU Pollinator Initiative](#), [the Environmental Crime Directive](#), [the European Climate Law](#), [the Communication on Integrated Wildfire Risk Management](#), etc.

reporting and review cycles, and to integrate biodiversity considerations into the European Semester and sustainable finance architecture.

However, the EU framework is necessarily indirect in its implementation. Delivery depends on Member States' action, national political will and administrative capacity. While the EU strategy explicitly recognises the need for a 'whole of society' approach and refers to the role of organised civil society in compliance assurance and access to justice, it does not itself establish binding mechanisms to embed civil society as a co-implementer or co-monitor. As a result, the effectiveness of the EU's contribution to the GBF ultimately hinges on how other NBSAPs interpret, operationalise and resource participation.

#### 4.2 The comparative ambition of NBSAPs from EU Member States

To date, only 15 out of 27 EU Member States have submitted their NBSAPs, and 19 their national reports, as contributions to the first global review<sup>16</sup>. The strategies and reports submitted show a broadly consistent alignment with the GBF. Almost all explicitly reference the GBF, adopt the 2030 mission and incorporate the 30% protection and restoration targets. In countries such as Denmark, Germany, the Netherlands and Austria, this alignment is accompanied by thorough quantified targets, sectoral integration and links to binding EU legislation, which signal ambition. These strategies tend to recognise biodiversity loss as a systemic crisis connected to consumption, land use, climate change and economic policy, and they attempt to integrate biodiversity considerations across agriculture, energy, urban planning and finance.

In contrast, several strategies display more limited ambition in practice, despite formal alignment. In Czechia, Spain, Hungary and Slovenia, long-term visions and diagnostics are often strong, but operational clarity, enforcement mechanisms and safeguards against policy trade-offs remain weak. In smaller or structurally constrained Member States, such as Luxembourg and Malta, ambition is shaped by territorial limits and administrative capacity, resulting in strong reliance on EU instruments but limited national innovation.

A common feature across nearly all NBSAPs is the prioritisation of conservation, restoration and risk-reducing actions under targets 1–12, while targets addressing indirect drivers of biodiversity loss, particularly sustainable consumption, financial flows and economic transformation under targets 14–18, receive comparatively less concrete treatment. This imbalance suggests that, while European strategies are moving decisively beyond the Aichi targets in scope<sup>17</sup>, they remain cautious in confronting structural economic drivers of biodiversity loss.

This is also reflected in how economic and productive sectors are framed. Strategies tend to emphasise reducing sectoral pressures on biodiversity, while giving less attention to the potential of these sectors to make a positive contribution. This may limit ownership and engagement, whereas recognising their role in supporting biodiversity objectives could foster more constructive involvement in implementation.

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<sup>16</sup> [Submitted NBSAP's](#): Belgium, Czechia, Denmark, France, Germany, Ireland, Spain, Italy, Luxembourg, Hungary, Malta, Netherlands (plus separate NBSAPs for Aruba and Curaçao), Austria, Slovenia and Sweden (latest update April 2026).

<sup>17</sup> [Aichi Biodiversity Targets](#).

While the EESC welcomes the efforts made by the EU and the 15 Member States that submitted their NBSAPs and the 19 that submitted their national reports, it echoes the key messages set out in its opinions by calling on the remaining Member States to submit their NBSAPs and 7th national reports before COP17 to strengthen the effectiveness of the first global review and ensure that the GBF moves from commitments to tangible results<sup>18</sup>.

### 4.3 The role of organised civil society

Civil society is mentioned in almost all EU and Member State strategies, often framed within ‘whole of society’ or ‘participatory governance’ narratives. Public consultations during strategy development have become standard practice, and several countries, notably Ireland, the Netherlands, Austria and Sweden, emphasise stakeholder dialogue, citizen engagement and education.

Nevertheless, recognition does not always translate into empowerment. In the vast majority of strategies, civil society organisations are positioned primarily as consultees, awareness raisers or voluntary partners rather than as formal implementers of biodiversity action. Few NBSAPs assign explicit responsibilities to civil society in ecosystem restoration, species management, monitoring or reporting. Even where non-state actors’ contributions are acknowledged in detail, such as in the Netherlands, these contributions remain parallel to government action rather than being structurally integrated into national implementation frameworks.

Financial support for civil society participation constitutes a major gap. While NBSAPs frequently acknowledge the need for additional biodiversity finance, they overwhelmingly address funding through national budgets, EU funds and private investment mechanisms. Dedicated and predictable funding streams for civil society organisations, particularly youth, Indigenous, grassroots and local actors, who are often on the front line of biodiversity conservation and restoration, are largely absent. This disconnect risks creating an implementation deficit in which expectations regarding participation are high, but the means to sustain engagement and delivery are inadequate.

Based on previous opinions, the EESC reiterates that the systematic, early and continuous involvement of organised civil society enhances the quality, legitimacy and social ownership of biodiversity policies, and contributes to identifying solutions that reconcile environmental objectives with social and economic realities<sup>19</sup>. It therefore calls for more robust multilevel governance arrangements under the GBF, ensuring the meaningful participation of organised civil society at local, national, EU and international levels. A ‘whole of society’ approach needs to explicitly recognise multilevel governance and must meaningfully include cities and regions. Delivering biodiversity targets requires strong local action, and cities and regions are therefore essential drivers of ambition and on-the-ground delivery. Such arrangements are essential for effective implementation, credible monitoring and the overall success of the first global review process<sup>20</sup>.

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18 [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*.

19 [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*; [NAT/961](#) – *Roadmap towards Nature Credits*; [NAT/841](#) – *Nature restoration targets under EU biodiversity strategy*.

20 [NAT/926](#) – *A comprehensive strategy for biodiversity at COP16*; [NAT/961](#) – *Roadmap towards Nature Credits*; [NAT/947](#) – *Healthy planet for healthy people: towards a comprehensive ‘One Health’ approach*.

#### 4.4 Monitoring, indicators and accountability

A central finding of this initial assessment is that formal alignment of NBSAPs with the GBF does not automatically translate into effective implementation. While many EU and Member State strategies reflect the structure and ambition of the GBF, implementation frameworks often lack clearly defined responsibilities, binding timelines and secure financing arrangements. This weakens accountability and creates a gap between political commitments and on-the-ground delivery.

Monitoring systems have improved significantly compared with the previous strategic cycle, with several countries providing detailed indicator annexes and aligning national indicators with EU and CBD reporting frameworks. Belgium, Germany and the Netherlands stand out for the sophistication of their monitoring systems. However, although most strategies recognise the importance of monitoring and reporting, indicators are not always sufficiently specific, measurable or clearly aligned with the GBF monitoring framework, limiting comparability and aggregation for the purposes of the global review.

This gap is particularly relevant for targets with a sectoral dimension (e.g. Target 5 and Target 10). In such cases, headline indicators do not always fully reflect the range of sectors concerned, creating a risk that some production systems remain less visible in implementation and review processes. For example, the headline indicators in Target 10 cover agriculture and forestry but do not include fisheries or aquaculture. As a result, they may not adequately capture the full scope of sectoral impacts on biodiversity. Aggregated headline indicators, if not complemented by sector-specific indicators, therefore risk obscuring responsibilities and progress at sectoral level. Ensuring that complementary indicators explicitly capture the role and performance of key sectors is therefore crucial, as what is measured is more likely to be recognised, acted upon and used for accountability within the global review process.

At the same time, reliable, accessible and comparable data are another prerequisite for an effective and credible global review. Data gaps, fragmented data collection and limited interoperability between EU-level and national monitoring systems continue to hinder a comprehensive assessment of progress under the GBF. For example, persistent scientific and monitoring gaps in marine environments undermine the effective design and assessment of restoration measures. Setting binding targets without addressing these gaps risks being counterproductive, and socioeconomic impacts on jobs, food production and coastal communities must be properly assessed. Investment and implementation should therefore be grounded in robust science and developed in close cooperation with fishers and other maritime stakeholders.

Transparency is equally essential. Biodiversity-related data, monitoring results and progress reports should be publicly accessible and presented in a clear and user-friendly manner. Data disaggregated by age and gender should become standard practice in biodiversity reporting and monitoring, enabling more accurate assessment of impacts, equity and inclusivity. Enhanced transparency enables organised civil society, social partners, young people and the general public to scrutinise implementation, contribute constructively to policy debates and hold decision-makers accountable. High-quality and transparent data are therefore fundamental for policy credibility, public trust and accountability.

Finally, civil society participation in monitoring remains the exception rather than the rule. Citizen science initiatives are acknowledged in some strategies, but they are rarely embedded within official

reporting systems or recognised as contributing to national GBF reports. Dedicated and institutionalised youth participation mechanisms are needed at EU and international levels, including the meaningful and systematic inclusion of children's and youth representatives in all official consultations and biodiversity-related decision-making processes. Accountability mechanisms for underperformance also remain weak. While review cycles are provided for, few NBSAPs specify corrective actions or consequences if targets are not met. Access to justice and legal standing for civil society, central to GBF targets 22 and 23, continues to vary significantly among Member States.

The EESC therefore calls for more robust implementation and monitoring mechanisms at both EU and national level, in line with its previous opinions, the implementation and monitoring provisions of the GBF and the obligations related to NBSAPs. This includes clearer implementation roadmaps, improved consistency across sectoral policies such as agriculture, fisheries, forestry, energy and transport, and systematic follow-up of commitments under EU environmental legislation, including the Biodiversity Strategy for 2030 and the Nature Restoration Regulation, together with the other environmental legislation adopted under the European Green Deal<sup>21</sup>.

#### **4.5 Financing and political will**

All strategies recognise that current levels of biodiversity financing are insufficient to meet GBF ambitions. Yet cost estimates are often imprecise, and reliance on future EU funding, CAP reform or private finance creates uncertainty. Political commitment is evident in high-level endorsements and legislative reforms, but competing policy priorities, including agriculture, infrastructure development, energy security and defence, frequently constrain concrete budgets and implementation. Short electoral cycles further undermine long-term policy consistency.

#### **4.6 Overall assessment and COP17 implications**

Taken together, the EU and Member States' NBSAPs represent a substantial improvement compared to those drawn up a decade ago in implementation of the Aichi targets in terms of scope, consistency and ambition. However, they remain largely state-centric in design and execution. Civil society is recognised as important but is not yet treated as a strategic partner with defined roles, rights and resources. As a result, a significant portion of the transformative potential envisaged by the GBF remains unrealised.

This state-centric approach also extends to the inadequate integration of economic actors in implementation frameworks. Economic actors, complementing but not replacing public funds, should be more systematically incorporated into plans in order to accelerate action, as they are practical delivery actors and cannot remain on the margins of the CBD process if GBF targets are to be met. Otherwise, gaps between political commitments and actual delivery are likely to persist. Their engagement requires approaches grounded in operational realities, taking into account environmental, social and economic implications. This also underlines the importance of ensuring that national reports adequately capture the role and contributions of economic actors in implementation.

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<sup>21</sup> [The Zero Pollution Action Plan](#), [the EU Forest Strategy for 2030](#), [the EU Water Resilience Strategy](#), [the European Ocean Pact](#), [the EU Pollinator Initiative](#), [the Environmental Crime Directive](#), [the European Climate Law](#), [the Communication on Integrated Wildfire Risk Management](#), etc.

For CBD COP17, the European experience highlights both progress and outstanding challenges. The EU is currently well placed to advocate globally for ambitious targets and their effective implementation, robust monitoring and integration of biodiversity objectives into all sectors. However, this requires that current attempts to change the EU's environmental legislation should not lower standards and weaken environmental policies. Even under current conditions and at the current rate, only 40% of the EU NBSAP's targets will be met by 2030. At the same time, the EU and its Member States should acknowledge that successful implementation requires moving beyond consultation towards shared responsibility, as well as policy and financing consistency.

The EU and its Member States have laid the institutional foundations for GBF implementation, but delivery by 2030 remains uncertain. Without strong environment policies and adequate finance, transformation to a sustainable economy, clearer allocation of responsibilities, stronger accountability mechanisms and sustained investment in civil society as an implementation partner, the gap between ambition and outcomes is likely to persist. COP17 represents a critical opportunity for the EU to demonstrate leadership not only through targets and legislation, but through governance reforms that embed participation, intergenerational equity and accountability at the heart of biodiversity action. In that context, the EESC remains committed to facilitating a more active role for organised civil society, in particular farmers, fishers and forest owners, in the CBD processes and the implementation of the GBF.

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## 5. Annex I: References

### Relevant EESC opinions

- [NAT/961](#) – Roadmap towards Nature Credits
- [NAT/949](#) – Future of organic and quality foods and how we can step up consumption
- [NAT/948](#) – Regenerative agriculture as a target towards enhancing sustainable food production, supporting climate and biodiversity objectives
- [NAT/947](#) – Healthy planet for healthy people: towards a comprehensive ‘One Health’ approach
- [NAT/946](#) – Phasing out fossil fuel subsidies while ensuring European competitiveness, mitigating the cost-of-living crisis, and promoting a just transition
- [NAT/944](#) – Civil society’s vision for a European Oceans Pact
- [NAT/927](#) – A Blueprint for a European Green and Social Deal, based on a wellbeing economy
- [NAT/926](#) – A comprehensive strategy for biodiversity at COP16: bringing all sectors together for a common goal
- [NAT/841](#) – Nature restoration targets under EU biodiversity strategy

### Other documents:

- [\*The European Union’s 7th National Report to the Convention on Biological Diversity on progress in the implementation of the Kunming-Montreal Global Biodiversity Framework.\*](#) European Commission, 2026.
- [\*Kunming-Montreal Global Biodiversity Framework.\*](#) Convention on Biological Diversity, 2022.
- [\*Aichi Biodiversity Targets.\*](#) Convention on Biological Diversity, 2010.
- [\*Convention on Biological Diversity.\*](#) Convention on Biological Diversity, 1992.

## 6. Annex II: Acknowledgments

This paper has been prepared with contributions from the following experts and civil society representatives.

- Friedrich Wulf, international biodiversity policy campaigner, Friends of the Earth Europe
- Paola Lepori, head of biodiversity and nature-based solutions, ICLEI – Local Governments for Sustainability (ICLEI Europe)
- Olivia Robertson, liaison officer on biodiversity, Youth and Environment Europe (YEE)
- Daniel Voces de Onaindi, managing director, Europêche
- Constantin Muraru, secretary-general, European Agroforestry Federation (EURAF)
- Max Schwarz, international affairs officer, European Bureau for Conservation and Development (EBCD)
- Ronja Fischer, co-coordinator, Global Youth Biodiversity Network Europe (GYBN)