

# BirdLife Briefing:

## Improving funding for nature in the EU

### Commissions MFF Proposals

#### Setting the scene: Nature in the new proposals

On 20 July 2025, the EU Commission published its proposals for the future EU Multiannual Financial Framework (MFF). These dossiers will significantly impact the EU's ability to cope with the crises, notably the Nature and Climate crisis. Whether the proposal will enhance the leeway for the EU to act or reduce it is yet to be seen. While subject to a significant structural reform, which might facilitate the implementation of an increasingly policy- and result-orientated budget, by dissolving most of the historic programs and changing the spending governance, **the proposal suggests a much smaller emphasis on the environment and climate compared to what is currently the case.** Both are not considered as core objectives any longer and are rather subtracted into more detailed provisions. The proposals come without any minimum spending targets or baselines, nor a continuation of programs dedicated to nature, such as the tiny yet highly effective LIFE Program. While there is a newly created overarching 35% expenditure target for climate and environment that is oriented along the 6 priorities of the EU taxonomy, including nature, there is no singling out of specific biodiversity objectives. This contrasts with the current budget, where dedicated allocations for nature are in place. **The new proposals leave it up to the EU Member States to decide how much they will invest in biodiversity - a troubling outlook.** To improve the overall funding situation for nature and climate in the legislative procedure, BirdLife suggests concrete tweaks to the Commission proposals, focusing on the following core areas:

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#### A. The overarching 35 % target of Art. 4 Performance Regulation

Given the major flexibilization of the new budget, mainly through the National and Regional Partnership Plans (NRPP's), initial programs or elements that were fundamental for EU-Biodiversity funding seem to be lost as such (notably parts of the CAP, the CFP and LIFE). Now, biodiversity is merely one of many priorities, without any predefined program nor budget or biodiversity expenditure target like in the current budget. Instead, the Commission proposes an overall 35% target for climate and environmental spending along the environmental priorities of the EU's taxonomy<sup>1</sup>.

<sup>1</sup> [REGULATION \(EU\) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#), Article 9: Environmental objectives: (a) climate change mitigation; (b) climate change adaptation; (c) the sustainable use and protection of water and marine resources; (d) the transition to a circular economy; (e) pollution prevention and control; (f) the protection and restoration of biodiversity and ecosystems.

The new Tracking and Performance Framework has the potential to enhance the implementation and operationalization of the 35% expenditure target compared to its predecessor, if it steers the development of the NRP-Plans, and is not simply imposed on already existing programs. However, there is no minimum budget for any of the 6 priorities, including priority (f) “the Protection and restoration of biodiversity and ecosystems”. Hence, there is no guarantee on the share of the budget biodiversity will receive through this instrument. With risks of further weakening during the negotiations, this target might lead to decreasing ambitions for nature compared to the current budget, which still fell far behind what is needed with only 5.9 %<sup>2</sup> spent on biodiversity, while the target was set at 10 %.

In addition to this, the Tracking and Performance Framework, notably its annex, has significant flaws. Within its current state, it risks a false and unscientific attribution of interventions to the 35% target that could make the overall instrument a major greenwashing vehicle. The tracking methodology, based on the Rio Markers system, has not been enhanced and made more granular, despite significant criticism by NGOs<sup>3</sup> and think tanks.<sup>4</sup> On the contrary, the additional weighting factor that had been implemented to enhance the tracking of CAP expenditures, has been scrapped, significantly disturbing the validity of the new framework.

#### **BirdLife suggestions to improve the expenditure target:**

- **The Climate and Environment spending target needs to be raised to 50% and a minimum target for biodiversity of at least 10 % has to be introduced** to meet challenges ahead, as well as global and EU commitments. Without such target, the EU is likely to even fall behind the ambitions of the current budget.
- **Annex I of the Performance Framework must be revised and based on scientific evidence.** It currently lists a range of intervention fields, falsely equipped with a 40% or 100% contribution marker, which are drastically overestimating contributions to the overall climate and environment goal, but particularly its subordinate target for nature protection and restoration. Instead of expecting the best possible outcome, the markers should be attributed according to the worst possible outcome and potentially amended with a weighting factor, as is the case within the current CAP tracking methodology. Additionally, both result and outcome indicators must become scientifically sound and more informative in relation to the respective intervention field.
  - One striking example is the income support payments, which include foremost the area based direct payments and likely only a very low share of climate and environmental schemes, a 40 % marker, is pure greenwashing (in particular after CAP conditionalities have been massively reduced) and significantly flaws the overall spending target.
- Introduce meaningful performance indicators, in particular impact indicators relating to the environment and biodiversity (such as Farmland Bird Index and Pollinators indicator, to align with the Nature Restoration Regulation).

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<sup>2</sup> [European Commission 2025, Budget contribution Biodiversity](#)

<sup>3</sup> NGO Statement; [Unlocking funds for nature: How the next EU budget must deliver for biodiversity](#)

<sup>4</sup> Nesbit, M, Whiteoak, K, et al (2022) Biodiversity financing and tracking: Final Report. Institute for European Environmental Policy and Trinomics.

- **The list of markers in the Annex I of the Tracking and Performance Framework is not complete and must be amended and made more granular by including all 6 priorities of the taxonomy.** Currently, it only reflects climate change mitigation, climate change adaptation & resilience and environment. The EU's spending on nature protection and restoration has to be assessed anyhow in order to meet global commitments and should be included as well.
- **Control and amending/correction mechanism:** The new budget can only reach its overarching policy objectives if the Commission enhances its control and oversight over expenditure. The framework must ensure that the Commission sufficiently tracks performance indicators, goals and intermediate milestones and, in case of violation or failure of meeting these targets, swiftly withdraws funds from Member States until programming and spending has been improved. The proposal gives some general provisions, mostly on monitoring and reporting for the Member States for the overall performance framework (see e.g. Art. 14 Performance Regulation. However, the mechanism proposed in case of failure to achieve the climate and environmental objectives (see Art. 4 (4 & 5) Performance Regulation) is not straightforward. In case of under- or over-achievement of the target, the proposal foresees consultations of several EU Institutions about appropriate measures, and allows the adjustment of the spending target, but does not guarantee that the Commission will actually make use of this nor hold-back money until a re-programming in the national spending has taken place. Within the NRPPs, Article 68 of the NRPP provision allows for such a swift withdrawal of funds, in case milestones, targets or outputs, defined in the respective NRPP have not been met. While this provision is very much welcomed, there is no guarantee that the commission actually makes use of this mechanism in practice.
- Harmful subsidies must be prevented and for it the “do no significant harm” principle (DNSH) rigorously implemented. To operationalize with low bureaucracy, a comprehensive and scientific exclusion list of harmful subsidies is necessary, which Article 5(2) provides a good base for.

## **B. The future of LIFE**

LIFE has an incredible track-record of successful and innovative projects around the EU. It has not only saved hundreds of valuable habitats and in times even prevented species from extinction, but brought together local stakeholders, jointly progressing solutions for the climate and biodiversity on the ground - including citizens, NGOs, farmers and public institutions.

In the Commission's proposals the LIFE programme, already tiny within the current MFF, dissolved completely and ended up as a mere mention of “LIFE Projects” within the clean transition pillar of the ECF and the NRPPs. According to our reading, the current Nature and Biodiversity strand has been dissolved into the NRPPs, mainly its Europe Facility. The general provision of the NRPP proposal states on page 19 (19) that the plans shall in parts build on the experience of LIFE, whereas Art. 3, provides the specific objectives of the fund which under (a, (x)), lists a range of objectives almost identical to the current LIFE programme. However, neither the LIFE provisions in the NRPPs nor the one in the ECF received any minimum budget nor provision on governance. This would equal the end of LIFE as we know it.

### BirdLife suggestions to improve LIFE:

- Given its success, LIFE should be continued. Particularly the **Biodiversity part within the NRPPs and its Europe Facility, needs a dedicated minimum budget**, as other programs within the facility have received (either by definition in Art. 10(2) NRPP-Regulation or more precisely in its Art. 26(4) with mentioning the specific Facility component). Without a dedicated budget, LIFE has to compete over an €11 billion pot (all that is left after deducting Europe Facility activities with a dedicated budget<sup>5</sup>) with 11 other activities, listed in the NRPP Annex XV as Union actions. Given the inflation and the current size of the budget, this would mean a drastic reduction of currently available funding.
- The LIFE activities mentioned in the NRPP Annex XV as Union Actions focus on strategic projects only and projects with a cross-border dimension. Standard action projects, which can be considered as the current core of the programme, are not mentioned at all. Standard action projects should be included into the provisions in Annex XV as well.
- As the Europe Facility remains under direct management of the commission, **existing and proven governance structures should be kept**, notably direct governance and a competitive application process.
- The Commission must make sure to continue supporting a level playing field among stakeholders, as foreseen in the EU Treaties. LIFE activities mentioned in the proposals should therefore **continue funding operation of environmental NGOs and CSOs**, as the LIFE operating grants have been doing in the existing MFF. **Additionally, environmental CSOs should be eligible for support through the newly created AGORA facility.**

### C. The new CAP

Due to its size, the CAP has historically delivered the main part of the budget that went into biodiversity, notably through the second pillar and the eco-schemes. The pure mention of agri-environmental and climate actions in Article 5 (f) of the CAP proposal as one of many priorities, even if part of the new ringfenced budget, does not guarantee any funds for biodiversity. The overall share that will be spent on nature protection and restoration, now even risks falling behind the current budget. Instead, area based direct payments and coupled support have been ring-fenced, leaving only a small fraction of that for nature. It is now up to the member states if they decide to increase this share, making a reduction in ambitions likely and potentially leading to a downwards spiral.

### BirdLife suggestions to improve the CAP:

- **No backtracking provision is needed to keep existing efforts and prevent losing years of progress.** The current CAP already uses such a clause, requiring Member States to increase their overall environmental ambition in their national strategic plans

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<sup>5</sup> EUR-Lex - [52025DC0570](#): A dynamic EU Budget for the priorities of the future - The Multiannual Financial Framework 2028-2034; Annex. The 2028-2034 Multiannual Financial Framework - Table

compared to the past. This should be continued amidst the accelerating nature and climate crisis.

- Ensure that annual spending for environment and climate objectives **is specifically ringfenced for this purpose** and substantially increases annually, from the current 32% to reach at least 50% by the end of the current CAP period
- **Ensure that agri-environmental and climate actions can be fully financed by the CAP budget.** The new budget proposes a 30 % co-financing rate (Article 35 (4), NRPP proposal), higher than in the second pillar of the current CAP. This likely leads to an overall reduction of environmental and climate ambitions, while harmful direct payments continue to receive 100 % CAP funding.
- Shift away from rigid minimum/maximum per-hectare payments toward a system that reflects actual societal demands and farm needs **by directing income support primarily to farms that deliver the greatest environmental and social benefits.**
- Define and harmonize farm stewardship requirements across the EU to **prevent a race to the bottom in environmental ambition.** This means replacing the vague 'protective practices' (Article 3 (4), CAP proposal) that member states can define with a clear set of actions and meaningful targets that can be monitored and evaluated effectively.
- **Ensure that guidance on the DNSH principle also applies to agricultural policy** by deleting the provision (Article 3, (3), CAP proposal) that automatically deems support linked to farm stewardship as compliant with DNSH.

## D. The new EMFAF

The European Maritime Fisheries and Aquaculture Fund (EMFAF) was established to support the implementation of the Common Fisheries Policy (CFP), the EU Biodiversity Strategy, and the broader objectives of the European Green Deal. Although it is the smallest EU fund, with a budget of over €6 billion for 2021–2027, the EMFAF is a critical investment instrument for safeguarding ocean health and advancing the EU's environmental, climate, and socio-economic commitments. However, analyses of Member States' Operational Programmes show a consistent failure: funding priorities are not aligned with EU environmental and social objectives.

In the Commission's proposal, the EMFAF would be absorbed into the National and Regional Partnership Fund (NRPf), with a shorter sectoral Fisheries Regulation intended to guide the use of fisheries subsidies. This restructuring risks diluting marine priorities within broader spending concerns. Moreover, of the €2 billion ring-fenced for fisheries—already a steep drop from €6 billion—no funding is earmarked for marine conservation or restoration. Provisions for small-scale fishers, who are central to a just fisheries transition, are also notably weak. Given that national EMFAF programmes already failed to dedicate sufficient funding to marine protection, this risk is likely to worsen under the NRPf, where no dedicated budget line for marine protection exists.

**BirdLife suggestions to improve the new fisheries regulation:**

- **Dedicate 50% of fisheries-related funding to the protection and restoration of marine ecosystems**, and the remaining 50% to supporting a just transition of the fisheries sector. Funding for the just transition should prioritize targeted support for the adoption of low-impact gear, the development and testing of mitigation measures to reduce the impacts of human activities (such as bycatch mitigation tools), business diversification, training programmes, and access to innovation for small-scale fishers.
- Include a binding obligation to **grant preferential access to funding for operators from small-scale coastal fisheries**, recognizing their key role in providing local employment and maintaining sustainable fishing practices
- Establish a mandatory criterion to **give priority access to funding for fishers who actively protect marine ecosystems**, reduce bycatch, and operate transparently
- Enhance the fisheries provisions within the performance framework, so these will become **scientifically credible and won't overestimate** the actual environmental contribution of the funds.