

## CEPF feedback on the draft uniform format for the national restoration plans

As member of the expert group on the Nature Restoration Regulation (NRR), the Confederation of European Forest Owners (CEPF) is pleased to contribute to the improvement of the draft uniform format for the national restoration plans (NRP).

To support the adequate implementation of the NRR, we trust that our suggestions will help refine the uniform format to better serve its intended purpose, while respecting the principles of efficiency, clarity, and flexibility for Member States.

### 1 General Comments

In the spirit of simplification and reduction of administrative burden, the uniform format should be kept as simple as possible and should not go beyond the requirements laid out in Article 15 of the NRR. All optional fields unrelated to Article 15's provisions should be removed to minimise administrative burden.

The NRP are intended for planning, not monitoring or reporting. Therefore, the purpose and scope of the uniform format should not go beyond the requirements.

In addition, the uniform format should not enforce uniformity in national-level planning. Member States need flexibility to tailor plans to their needs while ensuring compliance with the NRR.

For clarity and accuracy, each box in the uniform format should reference the corresponding Article in the NRR to ensure consistency and relevance. Furthermore, the wording of the boxes of the uniform format should match precisely the full text of the NRR.

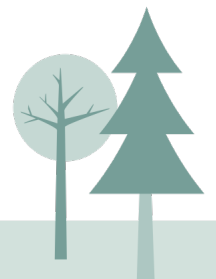
### 2 Specific comments

#### 2.1 Socio-economic impacts

Article 15(3)(f) requires the inclusion of "foreseeable socio-economic impacts and estimated benefits" in NRP. The uniform format box 4.1.3 should align with Article 15(3)(f) language, encompassing both foreseeable socio-economic impacts and estimated benefits. It should allow to account for potential negative impacts.

#### 2.2 Derogations and unavoidable habitat change

The uniform format lacks space to address and to describe derogations from the objectives due to climate change (e.g. boxes 4.2.2. and all boxes under part 12). If a restoration measure is not possible due to natural constraints or overriding public interests, including climate change, as per Article 4(12), the related box should not have to be filled.



## 2.3 Indicative Maps of Areas to Be Restored

No map of potential restoration areas should be included in the uniform format nor the NRP (non-exhaustive e.g. boxes 6.2.2.3, 6.2.4.7, 6.3.1.5, 6.3.2.4, 7.2.1.3, 7.2.3.7, 7.2.4.4, 7.3.1.1.5, 8.2.2.2, 8.2.2.4, 10.2.1.2, 10.2.2.2, 12.2.1.2, 12.2.2.2, 14.5.2.). Even if indicative, the potential designation of private land without prior and informed consent from their owner is inappropriate and opposes the NRR intent. The NRR text emphasises the need of respecting property rights and stakeholder engagement, and an indicative map for restoration does not respect voluntariness for private lands designation.

## 2.4 Threshold, baselines, and methodology

The box 6.2.4.3 of the uniform format states that only habitats that derogate from their favourable restoration areas by more than 2 % are deemed relevant for the reestablishment measures. Removing this threshold is needed, as Article 15(3)(c) of the NRR requires a description of areas to be restored, but does not specify any threshold.

In box 6.1.2.4, if optional boxes are included, there could be a need for a space to describe the methodology used to determine favourable reference areas, including reference years. Additionally, the box 6.2.1.4 should include the reference “at national biogeographical level”.

The box 12.1.2.3. would be improved by clarifying the meaning of “baseline levels” and ensuring consistency across similar sections.

## 2.5 Inconsistencies and unnecessary aspects, incl. monitoring and reporting

Many related sections referencing Article 14 are marked optional. Therefore, the box 4.2.8, identification of agricultural and forestry practices, should be optional as well. In the spirit of simplification, the optional box should be removed from the uniform format. For this same box, the part referring to Article 15(5) is unnecessary, as already addressed in box 4.2.7.

Box 12.1.3 should be removed to align with the corresponding agriculture section (e.g. box 11.1.3 states this part is not applicable to the first plan).

The uniform format is intended for planning, not monitoring or reporting. For example, section 6.2.2 relates to Article 4(1)(a) but not Article 15, which governs the NRP content. Similarly, box 10.1.3.1 relates to monitoring, already covered in box 5.1. and they should thus be removed.

The part C of the draft uniform format is complicating strongly the implementation of the requirements set out in Article 15(3)(c) of NRR. Describing a measure and then linking it to all different ecosystems with, e.g. information about timing, is unnecessary and does not support the actual operational planning. The categorisation of measures with “unique measure IDs”, and the use of a uniform description of measures, add disproportionate administrative burden, going significantly beyond NRR requirements.

## 2.6 Subventions with negative impacts

Article 15(3)(v) of the NRR requires the identification of subsidies that negatively affect biodiversity, but makes no mention of distinguishing between types of subventions. There is no clear need to to differentiate between energy/fuel-related subventions and other subventions as per box 4.3.2.1.

The Confederation of European Forest Owners (CEPF) represents national forest owner organisations in Europe. At EU level, CEPF promotes the values of sustainable forest management, private property ownership and forest sectors' economic viability. Based in Brussels, CEPF is a non-profit organisation, representing nearly 16 million forest owners. These are private individuals, families and cooperatives, which take care of approximately 60% of the European forest area. [www.cepf-eu.org](http://www.cepf-eu.org)