



1. General Observations

The Mission for Natural Heritage (M4N) welcomes the European Commission's effort to establish a uniform format for national restoration plans under the Nature Restoration Regulation (NRR). We acknowledge the importance of ensuring consistency, transparency, and accessibility of restoration plans across Member States. However, we believe that the current draft could be further strengthened in several key areas to ensure that it effectively supports biodiversity restoration efforts, particularly in Mediterranean coastal and marine environments.

2. Alignment with the Draft Principles

The proposed uniform format for national restoration plans is a significant step towards structured and transparent restoration efforts. However, M4N identifies several areas where improvements could enhance the effectiveness of implementation:

2.1 Supporting the Precautionary Principle and Passive Restoration (Articles 4, 5, and 12)

- The draft should explicitly integrate the precautionary principle to ensure that conservation efforts take precedence over compensatory measures. This aligns with the non-deterioration clause in Article 4.
- Passive restoration should be prioritised in marine ecosystems, as outlined in Article 5, focusing on reducing pressures like overfishing, anchoring and pollution before resorting to interventionist restoration measures.
- Article 12, addressing forest ecosystems, should emphasise the importance of allowing natural regeneration processes rather than over-reliance on afforestation projects.

2.2 Strengthening Nature-Based Solutions (NbS) and Climate Resilience (Articles 8 and 9)

- Article 8 requires the maintenance and enhancement of urban green spaces and tree cover. We propose stronger integration of Nature-based Solutions (NbS) to ensure urban resilience against climate impacts.
- Article 9 focuses on river connectivity. The uniform format should include detailed provisions to ensure wetland restoration, the four dimensions of connectivity (longitudinal, lateral, vertical and the dynamic behaviour of flow), and the removal of barriers as priority actions.

2.3 Enhancing Public Participation and Stakeholder Engagement (Articles 14 and 15)

- The draft acknowledges the need for public participation (Article 14(20)), but it should go further by requiring early and continuous stakeholder involvement in planning and implementation and allowing stakeholders to provide feedback. The information provided in this section must include steps taken to ensure that such an approach is taken. Moreover, this section should identify that the public participation undertaken



also meets the requirements of Directive 2001/42/EC in line with the provisions of Art. 14 par. 20 of the NRR.

- Member States should be required to report on the effectiveness of public consultations in Article 15(3)(w), ensuring transparency and accountability. Additionally, ad hoc governance bodies should be strengthened to streamline public participation and policy harmonisation in restoration efforts.

2.4 Ensuring Financial Sustainability and Innovative Funding (Article 15(3)(u))

- The uniform format should include guidance on how Member States plan to secure long-term financial resources, beyond EU funding, through mechanisms such as payments for ecosystem services, conservation contracts, and carbon credits, while also identifying and phasing out perverse subsidies that incentivise environmental degradation. Redirecting such subsidies towards nature-positive initiatives would significantly enhance the financial sustainability of restoration efforts and prevent counterproductive investments.
- Member States should specify financial commitments for restoration measures under Article 15(3)(u) to prevent underfunding from hindering progress.

2.5 Integrating Sub-National and Cross-Border Restoration (Articles 4, 5, and 14)

- Article 4 and 5 should emphasise cross-border cooperation for shared ecosystems, especially in the Mediterranean where marine and coastal areas require regional coordination.
- Article 14 should require stronger integration of sub-national authorities, ensuring that local and regional governments play an active role in restoration planning and implementation, as they ensure the long-term sustainability and local ownership of restoration projects. This aligns with Chapter 2.1 of the proposed format, which requires Member States to report specifically on stakeholder engagement, including the role of sub-national authorities in preparing and establishing the National Restoration Plans.

2.6 Improving Monitoring and Data Integration (Article 20)

- Article 20 requires Member States to monitor restoration progress, but standardised, science-based indicators should be mandated as well as uploading data to official EU platforms.
- Use of remote sensing, AI-driven monitoring, and citizen science should be incorporated to improve data quality and accessibility.

3. Conclusion

The Nature Restoration Regulation represents a landmark opportunity to restore ecosystems across Europe, but its success depends on the strength and clarity of the national restoration plans. The proposed uniform format must ensure a high level of ambition, encourage stakeholder participation, and secure the necessary financial and governance structures for effective implementation. The Natural Heritage Mission remains committed to supporting this process and looks forward to continued collaboration with the European Commission and Member States to achieve these goals.



ANNEX - Contributions from Natural Heritage Mission Thematic Projects and Community of Practice

Nature-based Solutions (NbS)

NbS are pivotal for sustainable restoration efforts, particularly in vulnerable ecosystems such as wetlands, coastal areas and riverine environments, and they offer a sustainable pathway to mitigate the impacts of climate change and enhance ecosystem resilience. Governments and investors should promote and invest in NbS that follow strict criteria, including a clear understanding of good and bad practices. Investments must be planned on a solid scientific basis and in close consultation with civil society under strict monitoring of their net benefits to the environment and communities.

- IUCN [Global Standard for Nature-based Solutions](#).
- PAP/RAC [“Guidelines on NbS for adaptation to climate change in different coastal typologies of the Mediterranean”](#).
- The Interreg Euro-MED [Wetland4Change](#) project provides a replicable framework through their innovative protocol for assessing carbon sequestration and flood regulation in wetlands. This project includes specific management practices and guidelines for monitoring the impacts of these practices on climate change mitigation and flood prevention. The protocol equips authorities with tools to prioritize wetland restoration for both adaptation and mitigation of climate change impacts.
- The Interreg Euro-MED [ARTEMIS](#) project develops and implements innovative restoration protocols and integrating ecosystem service values into financial and policy frameworks, to restore and conserve seagrass meadows in the Mediterranean region. Through four transnational pilot projects, all stages of restoration, from transplantation in degraded areas to the enhancement of protected ones are covered, establishing a baseline for ecosystem service enhancements.
- The Interreg Euro-MED [MPA4Change](#) project enhances the role of Marine Protected Areas (MPAs) and restoration as nature based solutions for climate change adaptation. Building on previous projects and in line with the EU Biodiversity Strategy objectives, the project's action plan for Mediterranean MPAs ensures their long-term sustainability and capacity.
- The Interreg Euro-MED [LocAll4Flood](#) project is developing an integrated and bottom-up governance model to manage flash floods and reduce their risks by combining actions of prevention, adaptation and mitigation. Among other actions, the project has compiled a catalogue of NbS to reduce flash floods impacts through wetland, dune, marine, river or forest restoration.

Reliable indicators of impact, clear metrics and performance standards

Crucial for evaluating the effectiveness of restoration measures, track progress, ensure accountability and adapt strategies when needed.

- The [STAR \(Species Threat Abatement and Recovery\) metric](#)



- The IUCN [Red List of Ecosystems](#)
- Monitoring frameworks for Key Biodiversity Areas.

Long-term monitoring systems

They are essential to provide ongoing data and feedback on the status and impact of restoration actions, and to ensure that these actions remain responsive to changing environmental and socio-economic conditions while facilitating adaptive management (by identifying emerging trends) and enabling timely adjustments to strategies.

- The IMAP Indicator of Land Change, developed under the UNEP/MAP, to monitor shifts in land cover can help evaluate the success of restoration actions and identify areas requiring further intervention. All contracting parties to the Barcelona Convention are obliged to comply with this.
- The Interreg Euro-MED [MedSeaRise](#) project, with case studies in the Mediterranean region, exemplifies the importance of continuous ecosystem monitoring. This project not only estimates the uncertainty of future ecosystem conditions, but also demonstrates the impacts of sea-level rise hazard, over anthropic activities and ecosystems.
- The Interreg Euro-MED [FRED](#) project, with six pilot cases across the Mediterranean, focuses on monitoring and preventing wildfires, addressing critical challenges in terrestrial restoration. By developing a communication platform that integrates a fire index map, the project enables stakeholders to coordinate responses effectively, even in areas inaccessible to vehicles.
- The Interreg Euro-MED [TREASURE](#) project tests and experiments new techniques for the remediation of degraded and polluted port areas environmental quality in and around Mediterranean ports. Moreover, it elaborates an integrated monitoring approach to environmental quality assessment, tested at a transnational level, resulting in an Impact Evaluation and Hazard Management matrix.

Governance tools

To ensure governance aspects for equitable and effective conservation are taken into account.

- The [IUCN Natural Resources Governance Framework](#)
- The [IUCN Green List of Protected and Conserved Areas](#) serves as a global standard for recognizing well-managed protected areas that achieve positive results for biodiversity and communities.
- The Interreg Euro-MED [GreenList4MMPAs](#) project explores how to apply the [IUCN Green List Standard](#), a global benchmark for protected area management quality, to the Mediterranean's unique context. By helping Marine Protected Areas assess and improve their quality, the project strengthens the fair and effective conservation of the Mediterranean's rich marine life and promotes successful conservation in the region.
- The Interreg Euro-MED [COASTRUST](#) project demonstrates the effectiveness of stewardship agreements as a governance tool. These agreements foster collaboration by engaging local actors in coastal restoration. By aligning incentives with conservation goals,



stewardship agreements enhance the sustainability of restoration actions and ensure shared responsibility among stakeholders.

- The Interreg Euro-MED [MPA4Change](#) project sets the target of supporting the integration of climate change adaptation strategies and the improvement of the management effectiveness of 100 MPAs by 2030 in the Mediterranean region, contributing in reaching the nature conservation objectives set for 2030 both at international level by the Convention on Biological Diversity and at EU level by the European Green Deal and Biodiversity Strategy 2030.

Knowledge-sharing platforms

Such platforms, including focus groups and communities of practice, foster collaboration and disseminate valuable lessons from successful projects. They are especially crucial for facilitating knowledge transfer between countries in the Mediterranean, bridging gaps between northern and southern nations, as envisioned by the Barcelona Convention. Highlighting examples of success of impactful restoration projects can inspire replication and mobilise support.

- The [Interreg Europe Library](#)
- The [Society for Ecological Restoration database](#)
- The IUCN [PANORAMA platform](#)
- The [Network Nature](#) project
- The Euro-MED [Wetland4Change](#) project exemplifies this through the development of a wetland knowledge base. This geoportal will allow users to visualize the ecosystem services provided by wetlands, such as carbon sequestration and biodiversity maintenance, through interactive infographics and maps.
- The [CitiesWithNature](#) and [RegionsWithNature](#) platforms facilitate the measurement of progress toward the Global Biodiversity Framework targets at local and regional government levels, spanning over 70 countries and involving more than 350 cities and regions. They serve as hubs for sharing experiences, tools and strategies for implementing restoration and conservation actions.

Innovative evaluation methods for ecosystem services

To attract investments in restoration and demonstrate its tangible benefits.

- The [Tessa toolkit](#) (Toolkit for Ecosystem Service Site-based Assessment) is an example of a user-friendly method for evaluating and comparing ecosystem services across different land-use scenarios, such as water regulation, carbon sequestration, and biodiversity.
- The SCARCE project applies multi-criteria indicators and provides a visual representation of ecosystem services in restored areas, showcasing benefits to local communities and highlighting trade-offs.
- The FLOUCA project demonstrates the economic and ecological value of effective MPA management by highlighting the spillover effect on fisheries. Well-managed MPAs increase



fish biomass within their boundaries, leading to greater fish abundance and improved catches in adjacent areas.

- In Lebanon, the Marine and Coastal Resources programme (Institute of the Environment at the University of Balamand, MCR-IOE-UOB) is in the process of developing a novel initiative that will explore the [cultivation of Mediterranean bath sponges on artificial reefs and in MPAs](#). This practice is to economically support small-scale, traditional fisher folks and to enhance ecosystem services like carbon storage and water filtration, creating a sustainable model that links economic activities with the benefits of restoration and of nature based solutions.
- In the Balearic Islands, the [Marilles Foundation](#) has conducted evaluations of the socioeconomic benefits of marine conservation in the Levante Reserve. Their findings demonstrate how well-managed marine protected areas can deliver significant returns in terms of biodiversity, tourism and local livelihoods, underscoring the financial viability of investing in marine restoration.

Citizen science

An effective way to engage the public, fostering a sense of ownership and participation in restoration. Such projects also enhance awareness and understanding of environmental challenges, empowering individuals and communities to become active stewards of nature.

- In Spain, the [“Observadores del Mar”](#) initiative exemplifies the impact of citizen science on marine conservation. Campaigns like “Spot the Alien Fish” and “Spot the Jellyfish” encourage collaboration between scientists, fishers and citizens to monitor the presence of invasive species and track jellyfish populations.
- In Lebanon, the [MCR-IOE-UOB](#) is harnessing citizen science to identify non-indigenous species (NIS) entering the Mediterranean via the Suez Canal through its FLOUCA catch/effort fisheries monitoring system in coordination with all stakeholders with an emphasis on fisher cooperatives. This cooperative project engages fishers in monitoring NIS while offering opportunities to diversify their income streams by targeting and landing those species.