Dear Mr Timmermans and Mr Sinkevičius,

Urgent action is required to tackle the current biodiversity crisis. We, the signing organisations and experts are writing to call for more focused attention on the conservation of European mammals. We propose to develop a structure, which will assist the European Commission and the EU (Candidate) Member States to achieve the European Green Deal and EU 2030 Biodiversity Strategy goals. This structure, a pan-European network of devoted mammal specialists, will deliver high-resolution data on the current occurrence, population status and trends of mammals of conservation concern. This information is vital for evidence-based conservation measures, nature-inclusive developments and improved law enforcement. The approach will be to involve both data users (EU and national authorities, developers, ecological consultants) and data providers (scientists, NGOs), to cooperatively develop the necessary mechanisms and protocols to make sure it suits both sides and delivers the targeted outputs.

With this position paper, we would like to draw your attention to the data scarcity for mammals. We propose to develop and deploy an efficient system to mobilise and deliver reliable data. These are badly needed to inform policy, regulations and implementation guaranteeing their positive contribution to the long-term favourable status of the European mammal species and the habitats they depend on.

**WHAT IS THE PROBLEM?** – Despite a strong legal framework – the EU’s Birds and Habitats Directives – the loss of biodiversity in Europe continues. As concluded in the mid-term review of the EU Biodiversity Strategy to 2020: **“At the current rate of implementation [of the EU Biodiversity Strategy], biodiversity loss and the degradation of ecosystem services will continue throughout the EU and globally, with significant implications for the capacity of biodiversity to meet human needs in the future.”**1 The ongoing evaluation of the EU biodiversity strategy to 2020 will provide further insights into the factors of success and failure by the end of 2020. This will inform the development of targeted implementation instruments and quantified objectives and measures to address the main causes of biodiversity loss in the EU.

To set targets (for example, 80% of Habitats Directive species to be in favourable conservation Status by 2030), and to track whether progress toward the targets is being achieved, high-resolution data are needed.

For many species groups, high-resolution data is absent and their conservation status assessment under EU Habitats Directive is largely based on expert opinion. For many species groups, there is no structure, tool, or place, where high-resolution data on the current occurrence, population status and trends are available for policy consultation and conservation planning.

**THE MAMMALS OF EUROPE** – The European mammal fauna consists of 264 species, 78 of them endemic to Europe. 27% of the 264 species have declining populations; 33% are of unknown population trend.2 For comparison, 23% of bird species have declining populations and 17% have unknown trends.4 The status assessment of European bird species benefits from quantitative population trend data derived from a well-established monitoring network covering the majority of species and countries in Europe. In contrast, most European countries have neither monitoring schemes, nor research and conservation agendas for mammals.

There is an urgent need to strengthen capacities for monitoring and conserving mammal populations in Europe, especially those of Threatened, Near Threatened and Data Deficient species.4 The quality of

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3 BirdLife 2004a
data on mammal distribution, occurrence and trends must be improved to support evidence-based decision making in policy and conservation.

Distribution maps of Habitats Directive species currently display rather data deficiency instead of the occurrence of species. Left: Pipistrelle bat (Pipistrellus pipistrellus); right: Otter (Lutra lutra). Registered observations of the species in the period 2000-2019 (the yellow and orange dots) suggest that they are far more common in western Europe than in central and eastern Europe, though this is most likely not true (Source: Global Biodiversity Information Facility - www.gbif.org). Lack of data or limited access to data (e.g. because only available on paper) can affect the article 17 reporting by the Member States, leading to wrong conclusions about the favourable conservation state.

**WHAT IS HAPPENING AS A CONSEQUENCE OF THE LACK OF GOOD DATA ON MAMMALS?** — Policies, planning decisions, development, and nature conservation activities are not supported by evidence on where, and what needs to be done to save Europe’s nature. For those species where assessments of their conservation status are mandatory, there are important consequences for the legality of licences, e.g. in the building industries and energy transition. The European Green Deal will be under-informed and may fail to deliver as much as it could on biodiversity and habitat conservation.

The European Green Deal will deliver effectively for nature, biodiversity, and climate-change resilience if it is evidence-based.

**WHY ADDRESS THIS PROBLEM?** — The availability of up-to-date high-resolution data will inform investment initiatives and facilitate the development and delivery of nature-inclusive EU policies. It will, therefore, facilitate the achievement of the Aichi and Biodiversity Conservation Strategy Goals and the delivery of a robust European Green Deal. The EC report to the EU parliament states “the 2020 biodiversity targets can only be reached if implementation and enforcement efforts become considerably bolder and more ambitious. Achieving this target will also require more effective integration with a wide range of policies, by setting coherent priorities underpinned by adequate funding.”

The mammals are the second largest group of species protected under the Habitats Directive, after vascular plants. Their threatened status might affect other species groups as some mammal species play vital roles in shaping the right environmental conditions for other species. For example, beavers and deer have a positive influence on biodiversity, because they increase habitat heterogeneity by altering the structure of the woodland vegetation and, in the case of beavers, by building dams. The decline of the wheatear (a bird) in the dunes is partly attributed to the decline of rabbits, whose burrows this bird uses as nesting sites. Small mammal holes provide nesting sites for bumblebees. Humans are also mammals. Therefore, mammal wildlife is an important resource providing
answers and solutions of importance for human health, as well as enhancing our quality of life: we all feel better after seeing a hedgehog or a dolphin. It gives us joy and a feeling of well-being.

**WHAT DO WE PROPOSE?** – a structure that helps to mainstream biodiversity into policy and implementation. It will provide high-resolution data about (changes in) the distribution and population trends of European mammals and stimulate/enhance the use of this data for more nature-inclusive activities in the different economic sectors. It consists of a Pan-European network, 1) connecting the specialists on mammals and 2) delivering high-resolution data on the current occurrence, population status and trends of the European mammal species of conservation concern (EU HD: Annex 4, IUCN Red List: TR, NT and declining), 3) enabling nature-inclusive development, 4) enhancing the Energy Transition and 5) reversing the loss of (mammal) biodiversity (habitats and species).

**HOW TO WORK TOWARDS ACHIEVING THAT GOAL?** – The philosophy of the approach will be to involve both sides – data users and data providers, to cooperatively develop the mechanisms and protocols in the system to make sure it suits both sides and delivers the targeted outputs. Thus, all stakeholders will be involved, including citizen scientists, NGO’s and scientists collecting and providing data, policymakers, planners, authorities, as well as commercial companies with an impact on nature.

**Prerequisites:**

1. A European program enabling the network of national mammal organisations in all European countries to mobilise resources – human, knowledge, data and creativity – to:
   a) design and establish the structure that will provide representative data on the status and distribution of the mammals of conservation concern, and
   b) develop and deploy appropriate surveys;
2. Commitment to the project (financial and cooperative) by companies/industries providing (large-scale) services in the fields of Energy Transition (wind, solar, earth, tidal, building/renovation reducing carbon emission), Agriculture, Fisheries, Transport and Urban development;
3. Commitment to the project (financial and cooperative) by planning and licencing authorities in the different European countries.

This process needs coordination and communication, as well as capacity building and structural support as the mammal research and conservation work is currently highly underfunded.

**WHAT WILL BE DONE?** – The process will use the Plan-Do-Check-Adjust (PDCA) method – a widespread planning/cause and effect cycle management method. The following steps are necessary:

- An initial assessment of the available data – quality and quantity;
- A data gap assessment;
- A research, conservation and synergies agenda; a team of experts further developing methods to sample and model/extrapolate distribution data and trends of mammals in the different European landscapes;
- A capacity-building program to enhance the capacities in numbers of fieldworkers, tools, and knowledge among the organisations collecting data about the distribution and trends of European mammals;
- An evidence review of nature-inclusive policy and development;
- Finding partners in the development and industry sectors, willing to mainstream biodiversity in their activities;
- A plan with a clear set of actions, deadlines and responsible parties per species;
- Advanced knowledge and expertise - used and shared, facilitating further development and implementation of the best practices and knowledge acquired;
- A continuous effort and coordination targeting an appropriate level of updating of data.

**WHO NEEDS THAT?** – The proposed structure will inform at least 12 EU policy areas, national authorities in all MSs and Candidate MSs, and numerous investment and development companies.

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6 For bats a first step was made with the development of a prototype biodiversity indicator based on counts in European hibernacula: https://www.eea.europa.eu/publications/european-bat-population-trends-2013.

7 Agriculture, Transport, Fisheries, Forestry, Urban development, Business and industry, Energy, Environment, Food safety, Health, Regional policy, Research and innovation.
The parties involved and signing this statement are ready to contribute to this process, commit to deliver the structure as described above and to contribute to the enhancement of the EU relevant policies.

We would be very grateful if you could provide us with the opportunity to present this proposal in more details and discuss its possible development.

Sincerely,

The European Mammal Conservation Network

The Habitat Foundation
European Mammal Foundation
BatLife Europe
The Mammals Society (UK)
Zoogdiervereniging (Dutch Mammal Society)
Dansk Pattedyrforening (Danish Mammal Society)
Norsk Zoologisk Forening (Norwegian Zoological Society)
Eesti Terioloogia Selts (Estonian Theriological Society)
Associazione Teriologica Italiana (Italian Mammal Society)
Sociedad Española para la Conservación y el Estudio de los Mamíferos (Spanish Mammal Society)
Asociación Española para la Conservación y el Estudio de los Murciélagos (Spanish Bat Association)
Sociedade Portuguesa de Mamíferos (Portuguese Mammal Society)
Deutsche Gesellschaft für Säugetierkunde (German Mammal Society)
Gatmos Tyrimų Centras (Scientific Research Institute Nature Research Centre, Lithuania)
Přírodovědecká fakulta, Univerzita Karlova (Faculty of Sciences, Charles University, Czech Republic)
Ελληνική Ζωολογική Εταιρεία (Hellenic Zoological Society)
Suomalainen mammologinen seura (Finnish Mammalogical Society)
Instytut Biologii Ssaków (Mammal Research Institute / Polish Academy of Sciences)
Asociatia pentru Conservarea Diversitatii Biologice (Association for the Conservation of Biological Diversity, Romania)
Centrul pentru Cercetarea şi Conservarea Liliicilor (Centre for Bat Research and Conservation, Romania)
Fakulteta za naravoslovje in matematiko (Faculty of Natural Sciences and Mathematics, University of Maribor, Slovenia)
Prirodoslovni Muzej Slovenije (Slovenian Museum of Natural History)
Udruga Biom (Association Biom - BirdLife partner Croatia)
Hrvatsko Biospeološko Društvo (Croatian Biospeleological Society)

Emlösvédelmi Szakosztály / Magyar Madártani és Természetvédelmi Egyesület (Mammal Conservation Group of MME/BirdLife Hungary)

Българска Фондация Биоразнообразие (Bulgarian Biodiversity Foundation)

Zoogdierenwerkgroep van Natuurpunt (Flemish Mammal Working group)

Asociatia pentru Protecția Păsărilor și a Naturii Grupul Milvus (Milvus group, Romania)

Swedish Mammal Society/Stockholm University, Sweden

Divlji svijet Crne Gore (Wildlife Montenegro)

Centar za krš i speleologiju (Centre for karst and speleology, Bosnia & Herzegovina)

Териологическое общество (Russian Theriological Society)

Institutul de Zoologie (Institute of Zoology, Republic of Moldova)

Інститут зоології ім. І. І. Шмальгаузена НАН України (Schmalhausen Institute of Zoology, National Academy of Sciences of Ukraine)

Українського Центру Охорони Кажанів (Ukrainian Centre for Bat Conservation)

Македонско еколошко друштво (Macedonian Ecological Society)

Shoqata e Ruajtjes dhe Mbrojtjes së Mjedisit Natyror në Shqipëri (Protection and Preservation of Natural Environment in Albania)

Рабочая группа кажаноў па Ахова птушак Бацькаўшчыны (Bat working group of Belarusian BirdLife partner APB)