

BUILDING BACK BIODIVERSITY

How EU Member States fail to spend
the recovery fund for nature

SLOVENIA

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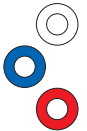


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1. Level of environmental ambition

The first draft of the Slovenian national recovery and resilience plan was discussed in October 2020 before its first version was made public on 23 December 2020 after the first round of discussions with the European Commission. Between December 2020 and April 2021, no public version was made available and the conference on the second draft was held in secret by the permanent advisory committee on climate policy. The final draft was submitted on 30 April and made publicly available in May 2021.⁵⁹

When comparing the need for conservation and restoration of nature in Slovenia with the current spending and effort, Slovenia's plan is not ambitious. The final version submitted to the European Commission does not include a single component that would involve any investment or measure that implements the objectives of the Habitats Directive or any other measure which would directly or indirectly contribute to biodiversity's health. **A compelling indication is the amount of times the word 'biodiversity' is mentioned: only five times in the 500-page plan.** Nevertheless, it is important to mention that multiple harmful measures were taken out of the final version of the plan due to pressure from civil society and the European Commission: road infrastructure projects, a waste incineration facility and support for the airline provider.

The recovery funds provide a historic opportunity for Slovenia to carry out major changes with the goal of shaping a fairer, greener and more resilient future. In order to meet the EU's environmental ambitions and make the best out of the Green Deal, all actors should work cooperatively, with commitment and ambition. This starts with the removal of measures that could cause significant harm to biodiversity.

⁵⁹ This assessment was based on the 30 April 2021 version of Slovenia's recovery plan.

2. Current state of biodiversity in the country

The analysis of the implementation of measures from the existing Natura 2000 management programme shows that for the most part, nature and Natura 2000 conservation goals have not been achieved. According to the Synthesis Report under the Habitats Directive 2019, only 38 per cent of habitat types (43 per cent in 2013) and 25 per cent of species (29 per cent in 2013) are in a favourable state. A greater decline in species, their distribution and population size, and habitat types was observed in recent years, with a reported deteriorating trend for more than half of habitat assessments and no species assessment with improving trends.

Negative trends that impact biodiversity in Slovenia are unsustainable management and activities particularly in the lowland areas, where the expansion of settled areas, the construction of industrial zones and roads and the intensification of agricultural land have all increased in recent years. Data on the loss of biodiversity in the agricultural landscape show that nature conservation in Slovenia is poorly and inappropriately included in the implementation of the EU Common Agricultural Policy (CAP). **Slovenia has no national biodiversity strategy or action plan. Biodiversity conservation is based on national policy and the Prioritised Action Framework (PAF) (for the period from 2021 to 2027).**

3. Potential impact on biodiversity

The 'do no significant harm' principle is mentioned in almost every component of the plan in compliance with the regulation establishing the RRF. The final version of the plan states that the recovery plan will in no case financially support any harmful investments, and more precisely, 'particularly investments detrimental to climate change mitigation objectives and investments detrimental to the transition to a circular economy'⁶⁰, in order to comply with the 'do no significant harm' principle.

For some investments, the plan offers a short explanation of how and in what way the 'do no significant harm' principle will be taken into account. However, multiple measures in the recovery plan can be perceived as harmful to biodiversity but nevertheless remain in the final version.

Additionally, the lack of detail and clarity is confusing: when stating investments in hydropower without naming or describing a specific project, a 'do no significant harm' assessment on such a vague measure raises questions about the methodology.

Based on the experience and multitude of bad practices currently being implemented on Slovenian rivers, the proposed measures concerning water management will very likely lead to extensive further degradation of Slovenian waters. Here are two examples from a longer list of harmful measures:

» Controversial hydropower plant

The first component of the plan ('Renewable energy sources and efficient use of energy in the economy') includes the building of a large hydropower plant (>10 MW), which will have a devastating effect on freshwater habitats as well as adjacent wetlands and other habitat types which are dependent on the groundwater level and a regular flood regime. These areas are habitats of endangered species.

» Flood protection measures

Component three, 'Clean and safe environment', predicts flood protection investments, which most likely include measures such as the removal of riparian vegetation, channelisation, the construction of transversal barriers, constructing dykes on the river banks, and laying concrete on riverbeds. These measures have been shown to increase the flow and speed of rivers, and consequently erosion, leading to a higher flood risk as well as increased maintenance requirements, continuous biodiversity degradation, etc. In terms of biodiversity, this would directly deteriorate the state of water and riparian habitats and indirectly affect adjacent wetlands, not to mention contradict the EU Water Framework Directive's targets. In the long-term, this may lead to species extinction (fish and other aquatic organisms). Although further details are not available in the plan, this type of measure could be harmful and would require the further disclosure of Slovenia's intentions for flood protection.

Unfortunately, the harmful investments listed above are not being counterbalanced by sufficient green measures. The Slovenian plan proposes two measures that could be positive for biodiversity. The first one is called 'Restoration and mitigation of climate change

⁶⁰ Republic of Slovenia, Government office for development and European cohesion policy, [Načrt za okrevanje in odpornost](#), 272, accessed 13 May 2021.

⁶¹ Gnezda A. (ed) Project and investment proposals for the Slovenian Partnership agreement and national Recovery and resilience plan, 2021.

and climate-related disaster resilient biodiversity rich forests'. This component follows the EU Biodiversity Strategy for 2030, but there are no specific actions that would directly contribute to forest protection. The measure consists more of forest management than protection. Based on our experience in various Member States, reforming forest management often turns into the economic management of forests in order to make forests more productive. This proposed reform, due to the lack of detail provided in the plan, cannot be qualified as positive, but as potentially positive.

4. Positive measures and alternative solutions

A range of other European policies and initiatives call for disaster risk reduction, mostly by following concepts like integrated water resources management, adaptive and ecosystem-based water management, catchment management and especially nature-based solutions as measures to contribute to environmental, social and economic benefits simultaneously. There are some indications that these concepts will be integrated in the planned water management activities in Slovenia's recovery plan (e.g. the plan mentions sustainable regulation of riverbeds), but there is a far greater number of proposals which include harmful management practices for water habitats and adjacent areas, such as the arrangement of accompanying water management facilities in the form of new dry reservoirs, flow regulations, and high-water embankments and walls.

Investments in biodiversity are becoming urgent given the fact that the conservation status of species and habitats in Slovenia has been deteriorating in recent years, with some areas in a critical state. In addition, climate change is increasing the need for flood control measures. In the current situation, a lack of involvement of biodiversity and ecology experts and monitoring of the execution of the proposed measures is evident. Many of the mitigation measures and re-naturation measures are evidently insufficient, or lack the potential to lessen the negative effect on biodiversity⁶².

5. Transparency and public consultation

In regard to the development process of the recovery plan, too little public information was provided to the public to trigger their comments and reactions. There was a total lack of public consultation and the absence of environmental expertise, which non-governmental organisations could have provided. Indeed, many of these organisations proactively communicated with the government about environmentally harmful measures, but decision makers gave little to no response regarding the content of this communication. This applies also to the lack of feedback on proposals provided by non-governmental organisations.



⁶² Alen Ploj, [Brežice Hydroelectric Power Plant – promises and reality. A review of the implementation of the promised replacement habitats and mitigating measures](#), December 2018.



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