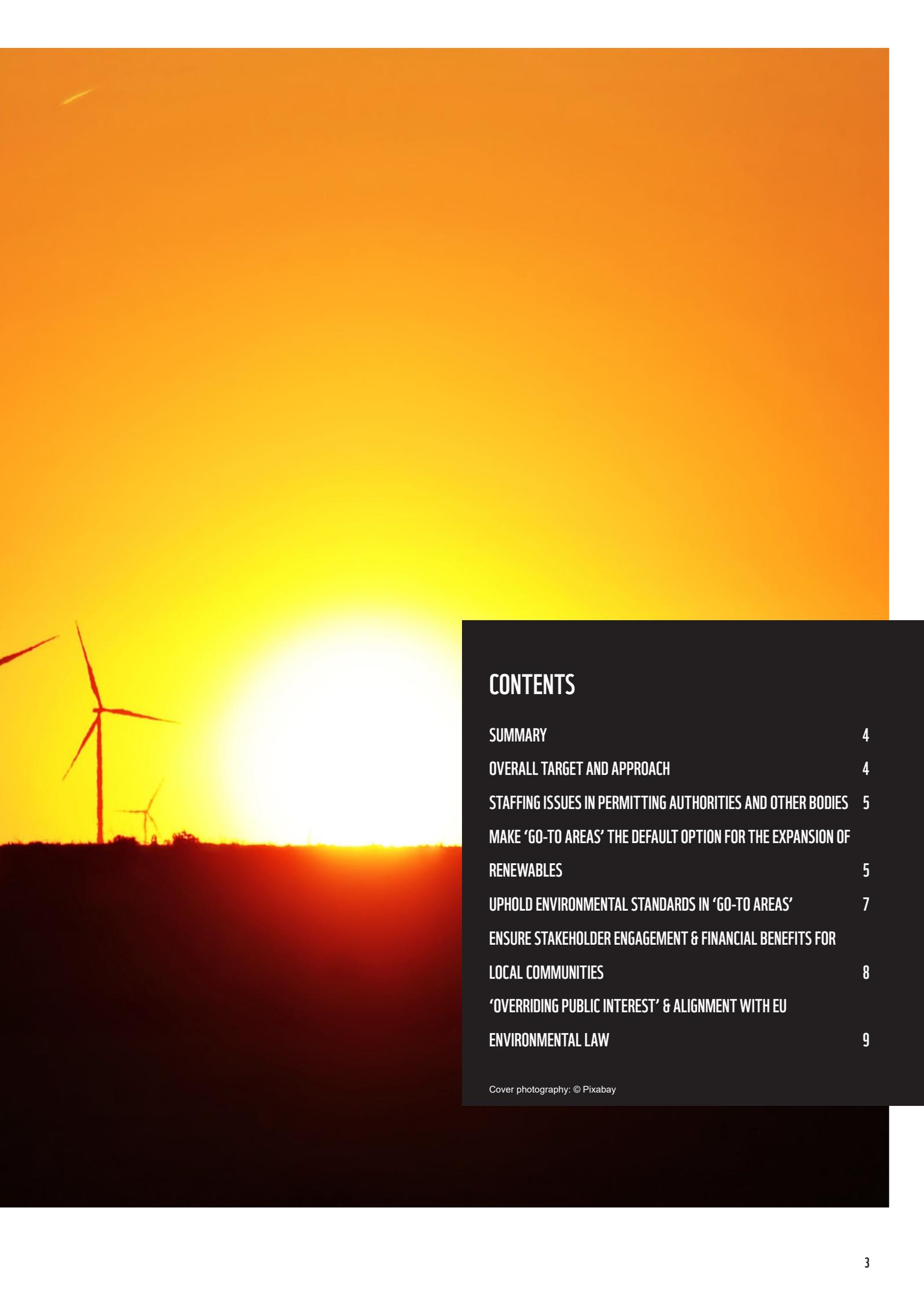
The background of the entire page is a composite image. The top half shows the silhouettes of several wind turbines against a warm, orange and yellow sunset sky. The bottom half of the image is a close-up, high-angle view of solar panels, showing their grid-like structure and the way they reflect light. The overall tone is clean and modern, emphasizing renewable energy.

'GO-TO AREAS' FOR RENEWABLES: MAKING THE PUZZLE FIT

**WWF Position on the legislative proposal to amend the
Renewable Energy Directive as part of 'REPowerEU'
September 2022**



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SUMMARY

To tackle the climate crisis and boost EU energy independence, and in parallel to saving energy, we need a massive expansion in renewable energy technologies such as wind and solar. **The Commission's 'REPowerEU' proposals to amend the EU Renewable Energy Directive (RED) are therefore timely, and contain some potentially useful additions, notably an increase in the 2030 renewable energy target.**

The idea of designating 'go-to areas' for renewable energy deployment and setting tighter permitting deadlines could also be helpful, provided that these areas are based on wildlife sensitivity mapping and reliable spatial planning (both of which would themselves facilitate more rapid renewable energy deployment) and provided that there are no 'go-to areas' for biomass or hydropower.

However, the Commission's proposals to weaken certain environmental rules are completely unacceptable and must be rejected. They could lead to damaging projects going ahead, would set a dangerous precedent for other sectors and, by creating legal uncertainty and public opposition, could slow renewable energy deployment down rather than speed it up. A better solution to real or perceived delays in permitting, apart from better spatial planning, would be to address the lack of staff and other resources in regulatory authorities.

For these reasons, policy-makers in the European Parliament and Council should amend the Commission's 'REPowerEU' proposals on the RED as follows:

- Increase the 2030 renewable energy target to 50% of final energy consumption, not 45%;
- Require Member States to identify 'go-to areas' that take account of the space required to meet their share of the 2030 renewable energy target, as set out in their updated National Energy and Climate Plan (NECP);
- Ensure that 'go-to areas' are based on wildlife sensitivity mapping and robust ecosystem-based spatial planning, and exclude environmentally sensitive areas such as Natura 2000 sites, nature parks and reserves, identified bird and marine mammal migratory corridors, blue carbon ecosystems and, unless the renewable energy technology to be deployed is compatible with the planned nature protection and restoration, areas foreseen for nature restoration under the proposed Nature Restoration Law, including free-flowing rivers;
- Make 'go-to areas' subject to a Strategic Environmental Assessment and an Appropriate Assessment pursuant to the Birds and Habitats Directives;
- Require meaningful engagement with stakeholders and

local communities in the process of defining 'go-to areas', including on how they can benefit from the expansion of renewable energy;

- Do not allow any 'go-to areas' for hydropower or bioenergy, as these can be extremely problematic in climate and/or biodiversity terms and must be treated differently from other forms of renewable energy.
- Delete Commission amendments that would undermine EU environmental legislation; specifically:
 - Reject the proposal to exempt projects in 'go-to areas' from the requirement to carry out an Environmental Impact Assessment and the Appropriate Assessment pursuant to the Birds and Habitats Directives;
 - Reject the provisions that would see projects approved automatically if the permitting authority fails to meet a specified deadline;
 - Do not include a general presumption of 'overriding public interest' for renewables at EU level in the RED.

OVERALL TARGET AND APPROACH

As part of the 'REPowerEU' proposal, the European Commission has proposed to raise the 2030 target for energy from renewable energy sources¹ (RES) to 45% of final energy consumption. WWF calls for a **2030 target for renewable energy of at least 50%** of gross final energy consumption. Alongside much higher ambition on energy savings, this is a prerequisite to the emissions reduction necessary to stay in line with a 1.5-degree pathway². It also reflects the dramatic falls in the cost of renewable energy technologies and batteries in recent years. Finally, it would bring significant benefits in terms of energy independence, air pollution and jobs.

To meet this higher target, **Member States urgently need to address roadblocks in the permitting process**, notably staffing issues in relevant bodies (permitting authorities, grid developers and judicial authorities), failures in spatial planning and inadequate stakeholder involvement. With the same urgency, they need to remove unnecessary barriers to renewable energy deployment such as excessively strict rules³ on the distance between renewable energy infrastructure and residential buildings, military facilities, radar systems and weather stations.

However, given the need to tackle the biodiversity crisis as well as the climate crisis, the acceleration of the transition towards 100% renewable energy cannot come at the expense of nature or involve a weakening of environmental legislation, not least because damaging nature can increase

¹ As defined in the Renewable Energy Directive (RED), Article 2(1).

² See Paris Agreement Compatible Scenario for Energy Infrastructure (PAC scenario), <https://www.pac-scenarios.eu/pac-scenario/scenario-development.html>

³ See e.g. Ember, "Change is in the Wind", <https://ember-climate.org/insights/research/change-is-in-the-wind/>

emissions (e.g. by turning carbon sinks into carbon sources) and therefore exacerbate the climate crises. **Renewable energy installations and related grid and storage infrastructure should be sited, constructed and operated in such a way as to avoid biodiversity-rich areas, minimise harmful impacts on biodiversity generally, and ensure the full involvement of local stakeholders.** Doing otherwise could easily create problems, including with public acceptance, and so lead to challenges and delays rather than an accelerated roll out. **The Commission proposal to exempt renewable energy projects from key provisions of EU environmental legislation must therefore be rejected.**

WWF supports the requirement that Member States identify 'go-to areas' for the deployment of nature-friendly renewables, particularly for wind and solar energy, provided that identification is based on wildlife sensitivity mapping and robust ecosystem-based spatial planning, and identifies spaces which are legally usable and technologically suitable for the specific type of renewable energy they are designated for. **Governments need to take responsibility for the location of renewable energy installations and provide sufficient space for the expansion of renewable energy needed** to meet EU and national renewable energy targets, while minimising environmental impact and ensuring the accomplishment of biodiversity conservation targets.

STAFFING ISSUES IN PERMITTING AUTHORITIES AND OTHER BODIES

The key to an efficient permitting process is building operational and technical capacity in the competent authorities.

Member States should be required to ensure that the financing of qualified staff, upskilling, and reskilling of their permitting authorities at national, regional, and local level is proportionate to the implementation of the renewable energy targets and the implementation of the updated NECPs. Other public bodies are facing bottlenecks due to understaffing, too, that need to be addressed, including grid operators and regulators and judicial authorities.

Since 2014, the European Commission has financed over 100 national and regional sea projects⁴ that focused on developing capacity for maritime spatial planning, environmental data collection and stakeholder engagement at the Member State and sea basin level. A similar approach could be used to support the identification of 'go-to areas' and the processing of permit applications in Member States that have insufficient capacity to deliver on their renewable energy plans within the proposed deadlines.

MAKE 'GO-TO AREAS' THE DEFAULT OPTION FOR THE EXPANSION OF RENEWABLES

Overview

Member States should be required to **identify 'go-to areas' taking account of the space for renewable energy needed to meet their share of the EU's 2030 renewable energy target**, as defined in their updated NECPs, and a perspective towards the further renewable deployment needed to reach full climate neutrality.

In doing so, Member States need to consider whether areas provide sufficient renewable energy resources (e.g. wind and sun), can actually be used for the deployment of the type or types of renewable energy they are designated as being suitable for, in compliance with all national laws and requirements, and that the necessary infrastructure, such as grid connections, can be provided.

'Go-to areas' should be, as a priority, those with low environmental sensitivity (e.g. brownfield sites) or, to the extent that those are insufficient to meet renewable energy targets, areas the choice of which would minimise environmental impacts, including on carbon stocks in forests and other carbon-rich landscapes and seascapes. Environmentally sensitive areas should be excluded. Designation of 'go-to areas' should be done in consultation with stakeholders and based on reliable and ecosystem-based spatial planning, using wildlife sensitivity mapping. For the standardisation of this process, clear conservation criteria are essential.

There should be no 'go-to areas' for biomass combustion plants or sourcing areas, or for new hydropower, given the serious climate and biodiversity risks associated with these technologies and the absence of adequate safeguards relating to them in the EU RED (see below).

Further renewable energy deployment will be needed after 2030 to reach climate neutrality. Member States should therefore regularly update their 'go-to areas', taking account of the latest technological developments and the repowering of old installations. To ensure alignment with achievement of EU renewable energy targets, this should be done at a minimum with every new or updated NECP. And ideally earlier, to give clarity to developers well in advance of the period covered by future NECPs and so allow the necessary time for project development, permitting and construction.

⁴ European Commission, 2022, European MSP Platform, <https://maritime-spatial-planning.ec.europa.eu/msp-practice/msp-projects>

Details

All ‘go-to areas’ should fulfil the following conditions:

- Natura 2000 sites and nature parks and reserves should be explicitly excluded from ‘go-to areas’, as should identified bird and marine mammal migratory corridors, blue carbon ecosystems, areas foreseen to meet biodiversity targets (such as the expansion of the network of Protected Areas - the pledge of 30x30), and, unless the renewable energy technology to be deployed is compatible with the planned nature protection and restoration, areas for nature restoration as defined in the recently proposed Nature Restoration Law, including free-flowing rivers. Potential impacts on carbon stocks in forests and other carbon-rich landscapes and seascapes should also be considered.
- ‘Go-to areas’ should be subject to a Strategic Environmental Assessment (SEA) and an appropriate assessment (AA) pursuant to the Habitats and Birds Directives to ensure installations within the ‘go-to area’ do not significantly harm surrounding Natura 2000 sites or affect protected species, and should define measures to avoid and/or mitigate this impact.
- The identification of ‘go-to areas’ should be based on multi-stakeholder consultations (see below)
- The **total space defined as ‘go-to areas’ (onshore and offshore) should take into account the need to reach the 2030 renewable energy targets** in the revised NECPs, which should in turn reflect the highest possible efforts for energy savings and electrification. Member States should regularly update their designation of ‘go-to areas’ (at least alongside every update of NECPs, ideally earlier) to account for technological developments and enable repowering of old installations.

For onshore renewable energy, Member States should define ‘go-to areas’ for the expansion of renewable energy technologies, with the exception of hydropower and biomass plants and sourcing areas.

- This should happen **within two years** after the entry into force of both the revised Renewable Energy Directive as well as the recently proposed nature restoration law, to ensure procedural alignment of the designation of ‘go-to areas’ with the designation of areas for nature restoration.
- To identify ‘go-to areas’, Member States should map suitable and legally usable land areas for the deployment of renewable energy (excluding hydropower and bioenergy) with low environmental sensitivity, such as brownfield areas and degraded land (unless designated for nature restoration and/or better used for carbon sequestration), industrial sites and already sealed areas. In doing so they should make use of existing spatial plans and wildlife sensitivity mapping, and consider the availability of wind and sun, grid connections, and areas

excluded due to national laws.

- To the extent that areas with low environmental sensitivity are not sufficient to reach the 2030 targets further areas should be considered, consistent with minimising environmental impacts.
- It is important to note that **this process of identifying ‘go-to areas’ should not constitute a (de facto or de jure) moratorium on the expansion of renewable energy**. On the contrary, we need to expand renewable energy urgently and Member States should continue to use national/regional best practice permitting procedures pending implementation of the new approach.

For offshore renewable energy, ‘go-to areas’ should be based on the areas already designated for offshore renewable energy in national maritime spatial plans (where already approved) unless they overlap with Marine Protected Areas. Where the designation of additional areas may be needed to reach the updated 2030 renewable energy targets, their designation should always be done using inclusive, transparent and science-based methods.

- Member States should assess all options for co-location of additional renewable energy installations (including floating solar, wave and tidal energy) at existing offshore wind farms or areas designated for offshore renewable energy.
- Maritime Spatial Plans (MSPs) will need to be updated by 2030 to fulfil the requirements of the MSP Directive (MSPD). This means that **additional areas for renewable energy compared with what is designated in current MSPs can be allocated based on an ecosystem-based approach to maritime spatial planning (EBA-MSP)**.
- Where member states have yet to finalise and submit their MSP, they should ensure that the areas for offshore renewable energy align with at least the 2030 targets for renewable energy and with an EBA-MSP. This approach harmonises the MSPD and REPowerEU, which is essential for policy consistency in the EU.
- The Commission should also provide a clear pathway for the expansion of ocean energy needed to reach, and ideally overachieve, the targets for 2025, 2030 and full climate neutrality set in the offshore renewable strategy, while ensuring that environmental impacts are closely monitored and addressed and good environmental status in accordance with the Marine Strategy Framework Directive (MSFD) is reached.

For **building heating**, municipalities should develop local heat maps, which provide clarity on how they will replace existing gas grids with heat networks (and which buildings will be connected to them when) or with individual building solutions. This will provide clarity to local authorities, homeowners, businesses and suppliers on the necessary pumps.

Implications

If the process is carried out properly by Member States, 'go-to areas' should help to ensure the 2030 renewable energy targets are reached and that the installation of such technology outside of 'go-to areas' is less likely to be necessary. On this basis, after the identification of 'go-to areas' for a certain technology, deployment of such technology outside 'go-to areas' could become the exception, requiring well documented and verified justification, and Member States could decide to prioritise permitting applications for projects within 'go-to areas' over those outside them.

The **tighter permitting timescales proposed by the Commission are welcome**, but should not lead to weakened environmental scrutiny (see below) or inadequate public participation. To that end, and as set out above, **Member States should ensure that funds are sufficient to strengthen the capacity and increase human resources of the agencies responsible for environmental permitting.**

UPHOLD ENVIRONMENTAL STANDARDS IN 'GO-TO AREAS'

To ensure that 'go-to areas' are an instrument to enable the accelerated expansion of renewable energy without undermining EU environmental legislation, **co-legislators need urgently to amend the changes to permitting rules proposed by the Commission, which would weaken environmental protection, lead to significant legal and socio-economic uncertainty and set a dangerous precedent** when it comes to sectors other than renewable energy. The conditions for environmentally sound 'go-to areas' are:

- **There should be no exemption for renewable energy, grid or storage projects within 'go-to areas' from environmental impact assessments (EIAs) and the appropriate assessment (AA)** as required in the Habitats and Birds Directives for all projects potentially affecting N2000 sites or protected habitats and/or species. Neither an SEA for the 'go-to areas' as a whole, nor the short screening foreseen within them, can sufficiently replace the steps provided in an EIA for individual projects. An exemption from carrying out EIA would mean the environmental impacts of a project in a 'go-to area', both inside and outside that area, would not be assessed, which would call into question the ability of authorities to monitor and evaluate infrastructure performance over time and its impact on biodiversity. In addition, public participation rights would be undermined. Participation rights,

such as the rights of neighbours, cannot be adequately considered at the abstract level. This would contradict Art 47 EUCFR and Art 6 ECHR and the provisions on a fair trial. Furthermore, Art 6 of the Aarhus Convention requires the effective involvement of the public in projects with potentially significant environmental effects. An exemption as foreseen in the draft proposal of the EC is not contained in the Aarhus Convention.

If carried out appropriately early in the project development process, there is generally no reason why an EIA should delay a project. And indeed the designation of 'go-to areas' can be particularly helpful in that regard, if it provides greater clarity for project developers on where to locate their installations while minimising environmental impacts. Provided that the designation of 'go-to areas' considers the latest science and takes advantage of methods such as wildlife sensitivity mapping, and that 'go-to areas' are subject to a robust SEA that considers all cumulative impacts, the data collection and time needed for the EIA associated with an individual project would be significantly reduced.

- **No automatic approval of permit applications in the event that the competent authority fails to respond within set deadlines.** Such a rule is incompatible with EU law and in particular with Art 47 of EU Charter of Fundamental Rights as well as with Art 6 European Convention on Human Rights (right to a fair trial). As automatic approval would be likely to be found unlawful by the ECJ, the consequence for project applicants would be massive legal uncertainty. This would run counter the stated aim of facilitating and accelerating the permitting procedure. It also comes with a high risk of harmful projects being approved, something which could damage public perception of renewable energy expansion and therefore undermine public acceptance of the energy transition.
- **'Go-to areas' should only be designated for renewable energy technologies such as wind and solar that are reliably low carbon and have high potential for significant expansion with low or limited environmental impacts. There should be no 'go-to areas' for hydropower and biomass combustion plants or sourcing areas.** An increase in hydropower plants would bring negligible benefits in terms of clean energy supply as most of the new plants now planned are necessarily small⁵, compared to the disproportionately damaging effect they have on freshwater ecosystems. Meanwhile the lack of criteria relating to biomass feedstocks in the RED (notably as regards primary forest biomass and dedicated energy crops) means that bioenergy projects could actually increase emissions compared to fossil fuels⁶.

⁵ The potential for large scale hydropower in Europe is essentially exhausted and 93% of currently planned hydropower plants have a capacity below 10 MW - and 60% below 1 MW. Source: https://wwfeu.awsassets.panda.org/downloads/hydropower_pressure_on_european_rivers_the_story_in_numbers_web.pdf

⁶ For further information on the risks associated with hydropower and bioenergy see here wwf.eu/what_we_do/water/hydropower/ and here wwf.eu/what_we_do/climate/renewables/bioenergy/.

- **Aligning the process to define ‘go-to areas’ with existing and upcoming environmental legislation**, particularly the Maritime Spatial Planning Directive, Maritime Strategy Framework Directive, Water Framework Directive, Birds and Habitats Directives, and the proposed Nature Restoration Law. As outlined above, this crucially means aligning the designation of onshore ‘go-to areas’ with the timeline of the Nature Restoration Law, and to align the designation of offshore ‘go-to areas’ with that and an ecosystem-based approach to maritime spatial planning.

ENSURE STAKEHOLDER ENGAGEMENT & FINANCIAL BENEFITS FOR LOCAL COMMUNITIES

Stakeholder engagement is critical to minimising and preferably avoiding any negative social impacts while maximising benefits and increasing public acceptance of renewable energy projects. Projects should be developed with sensitivity to community needs, rights and values, and should bring benefits to the local community. Project developers must be encouraged to move towards true co-development with local authorities and citizens.

- To ensure sufficient participation of stakeholders, particularly local communities, in the process of defining ‘go-to areas’, **public consultation should be carried out and all relevant stakeholders engaged meaningfully at an early stage of the process**, in line with the European Code of Conduct on Partnership⁷. Adequate consultation time⁸ should be provided, with targeted efforts made to engage vulnerable and ‘hard to reach’ stakeholders. Results from the stakeholder consultation should be transparent and publicly accessible and final decisions by the competent authorities should set out how stakeholder views have been integrated and taken into account, and provide justification in cases where they have not been addressed. During the consultation process and in the communication of decisions, **information should also be provided for citizens on how they can benefit from the expansion of renewable energy (financially and otherwise)**, including through renewable energy communities (with assistance available to help set these up) and use of revenue to the benefit of local inhabitants.
- **When designating ‘go-to areas’ for renewable energy projects**, in addition to minimising environmental impact as outlined above, **socioeconomic impacts and local benefits should be taken into account**⁹. For instance, former coal surface mines may be good sites for solar or wind development because of the limited potential of degraded land for agriculture and the nearby grid connections.
- **In cases where ‘go-to areas’, or the cumulative impacts of projects, may cross boundaries, cooperation between neighbouring states, regions or municipalities is key** to avoiding delaying the deployment process and finding solutions that minimise the impact on nature and communities. During the planning design process, communities of practice established under inter-governmental frameworks - i.e. forums where policymakers, scientists and engaged citizens can share knowledge - can provide external technical capacity to help national authorities in designating ‘go-to areas’.
- To complement the development of ‘go-to areas’ and improved permitting procedures in the RED, EU and national regulation and legislative support (including as part of the new REPowerEU chapters developed under the Recovery and Resilience Facility) should **facilitate the sharing of benefits of renewables expansion and power system decentralisation with communities**. This could include minimum levels of community (municipality) ownership of renewables projects, support for Renewable Energy Communities, Pacts for Skills or obligations on large utilities and renewable operators to provide financial contributions to local communities and training opportunities for workers wanting to move into the renewables sector (including those currently working on in fossil fuel sectors). Together, these can ensure local benefits of the energy transition.

⁷ Commission Delegated Regulation 240/2014

⁸ Adequate time should mean around 2 months, taking into account the importance of such consultation as well as the urgency to speed up permitting and scale-up wind and solar energy.

⁹ A good example of how this can be achieved is provided in the proposal undergoing consultation by WWF Greece for a new draft law for a new planning system for the spatial deployment of renewable energy power stations and storage facilities. Social and economic, environmental, climate, and energy objectives are placed on an equal footing. Access to the consultation (on 5th July 2022): ecodialogues.gr/diavouleuseis/systema-xorikis-anaptyksis-ape

'OVERRIDING PUBLIC INTEREST' & ALIGNMENT WITH EU ENVIRONMENTAL LAW

The Commission's proposals to amend the RED would have a direct impact on existing EU environmental law, particularly on the Birds, Habitats, Water Framework, Marine Strategy Framework and Maritime Spatial Planning Directives¹⁰. **The Commission's proposals must be amended to ensure that the provisions laid out in these directives are not weakened or undermined in any way.** Particular concerns in this regard, in addition to those discussed above relating to exemption from such things as environmental impact assessments, would be the following:

- The concept of an **'imperative reason of overriding public interest' (IROPI)** already allows for projects to be developed despite an impact on the protected habitat or species, if they are of outstanding importance for the public, if a lack of alternatives has been proven, and if mitigation and compensation measures are carried out. Case law of the European Court of Justice (ECJ) and national courts has shown that the mitigation of climate change already constitutes such an interest. However, this needs to be applied on a case-by-case basis, and can only be applied after steps demonstrating the necessity for such an exception (starting with an Appropriate Assessment) have been taken.
- Establishing a general presumption of IROPI for all renewable energy projects everywhere (explicitly aiming at derogations from EU environmental law) will therefore not substantially improve the permitting process for renewable energy installations, grid and storage infrastructure but **sends the wrong signal to project developers and misleads them into believing that environmental law does not need to be considered anymore.** Contrary to the aim of speeding up processes, this might even lead to more projects being challenged in court on environmental grounds, thereby slowing them down.
- **Such a general presumption at EU level in the RED, which might undermine the need for a case-by-case approach, could open the door to similar blanket presumptions of IROPI for other whole economic sectors in the future (such as mining or agriculture), thereby substantially and further weakening EU environmental legislation.** In addition, a general presumption of IROPI pitches climate protection against nature conservation. This is very concerning as the climate and the biodiversity crisis are twin crises and can only be solved together.

- All provisions in the proposals equating the fulfilment of certain requirements in the RED to the fulfilment of the requirements of Directive 92/43/EEC and Directive 2009/147/EEC and other acts of Union law, must be removed. As discussed above, the removal of such provisions should include all requirements for carrying out assessments or not carrying them out, as well as compliance or non-compliance with other obligations arising under other acts of Union law. Moreover, when streamlining EIAs and AAs, the conclusions for each report should remain clearly distinguishable.

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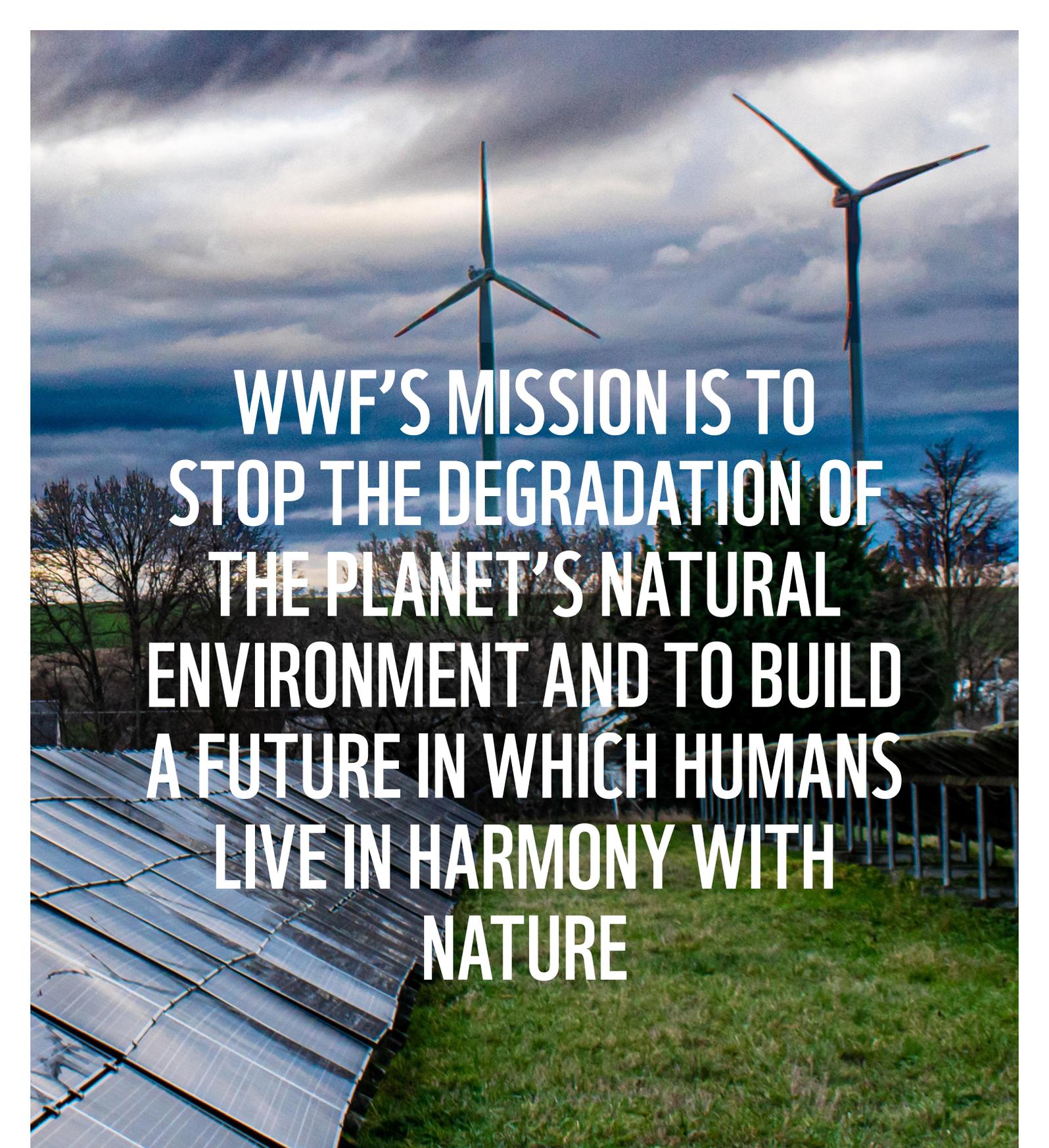
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¹⁰ The proposals withdraw the Member States' discretion under Art. 2, paragraph 4 of EIA Directive, and contradicts Articles 6(2) and (3) and 12(1) of Directive 92/43/EEC and Article 5 of Directive 2009/147/EEC.



WWF'S MISSION IS TO STOP THE DEGRADATION OF THE PLANET'S NATURAL ENVIRONMENT AND TO BUILD A FUTURE IN WHICH HUMANS LIVE IN HARMONY WITH NATURE



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