

Statement on Article 6 of the EU Nature Restoration Law

The biggest cities in Finland (C21 network) and the Regional Councils of Helsinki-Uusimaa, Päijät-Häme, Kymenlaakso, Northern Savo, Central Finland, Southern Carelia, Northern Carelia, Lapland, Tampere Region, Häme and Satakunta and the Association of Finnish Municipalities wish to express their concern about Article 6 "Restoration of urban ecosystems" of the EU Nature Restoration Law which is currently under preparation. The goal to promote biodiversity also in urban areas is important, but the proposed Article 6 does not meet its purpose and is in fact impossible to implement from both biodiversity as well as sustainable urban development point of view.

The C21 network includes the cities of Helsinki, Espoo, Tampere, Vantaa, Oulu, Turku, Jyväskylä, Lahti, Kuopio, Kouvola, Pori, Joensuu, Lappeenranta, Hämeenlinna, Vaasa, Rovaniemi, Seinäjoki, Mikkeli, Kotka, Salo, and Porvoo.

We propose that the Article 6 will be modified according to the following principles:

There should be more flexibility in the Article 6 for local circumstances to be taken into account

- Only general goals and principles concerning urban ecosystems should be defined on EU-level. Member States should be in charge of more detailed goals and targeting the measures.
- Legally binding land use plans must be possible to implement regardless of the Article 6.
- Promoting biodiversity taking into account whole city regions consisting of several municipalities should be made possible.

A threshold value should be set concerning the obligations to preserve and increase the amount of urban green space

- The existing amount of urban green space must have significance in terms of the areal obligations set by the Article 6. The EU should define a national threshold value of urban green space, for example 20% of all cities aggregated. The obligations to preserve and to increase the amount of urban green space (no net loss, increasing trend, net gain etc.) must be targeted to those Member States, where the national aggregated amount of urban green space falls under the threshold value.
- The Member States define the measures to increase the amount of urban green space.

Urban biodiversity and the use of green infrastructure in built environment must be increased in all Member States

- Even though (because of the threshold value) not all Member States are subject to the obligations to increase the amount of urban green space, all Member States should increase urban biodiversity until the satisfactory level defined in the National Restoration Plan is reached. Urban biodiversity can be promoted for example by developing urban green spaces more diverse in terms of species, improving their connectivity and through integrating green space into buildings and infrastructure.

Yours sincerely,

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Jaakko Mikkola, Regional Mayor, Regional Council of Kymenlaakso

Niina Pautola-Mol, Regional Mayor, Regional Council of Päijät-Häme

Satu Vehreävesa, acting Regional Mayor, Regional Council of Pohjois-Savo

Pekka Hokkanen, Regional Mayor, Regional Council of Central Finland

Satu Sikanen, Regional Mayor, Regional Council of Southern Carelia

Markus Hirvonen, Regional Mayor, Regional Council of Northern Carelia

Mika Riipi, Regional Mayor, Regional Council of Lapland

Anna-Mari Ahonen, Regional Mayor, Regional Council of Tampere Region

Toni K. Laine, acting Regional Mayor, Regional Council of Häme

Kristiina Salonen, Regional Mayor, Regional Council of Satakunta

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Anna-Kaisa Ikonen, Mayor, City of Tampere

Ritva Viljanen, Mayor, City of Vantaa

Seppo Määttä, Mayor, City of Oulu

Minna Arve, Mayor, City of Turku

Timo Koivisto, Mayor, City of Jyväskylä

Jarmo Pirhonen, Mayor, City of Kuopio

Pekka Timonen, Mayor, City of Lahti

Marita Toikka, Mayor, City of Kouvola

Lauri Inna, Mayor, City of Pori

Kari Karjalainen, Mayor, City of Joensuu

Kimmo Jarva, Mayor, City of Lappeenranta

Olli-Poika Parviainen, Mayor, City of Hämeenlinna

Tomas Häyry, Mayor, City of Vaasa

Ulla-Kirsikka Vainio, Mayor, City of Rovaniemi

Jaakko Kiiskilä, Mayor, City of Seinäjoki

Janne Kinnunen, Mayor, City of Mikkeli

Esa Sirviö, Mayor, City of Kotka

Anna-Kristiina Korhonen, Mayor, City of Salo

Jukka-Pekka Ujula, Mayor, City of Porvoo

Article 6 / Principles behind the Statement

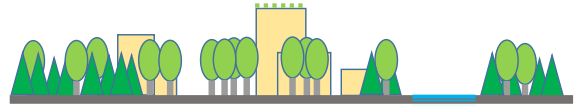


What can different types of cities do to promote biodiversity?

EXISTING AMOUNT OF URBAN GREEN SPACE

Those cities where the amount of urban green space is above the satisfactory level:

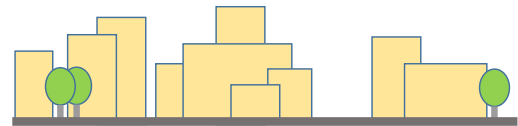
- Improving the ecological quality and connectivity of existing urban green spaces from biodiversity point of view
- Increasing trend in green infrastructure solutions



Satisfactory level of urban green space

Those cities where the amount of urban green space is below the satisfactory level:

- No national net loss of urban green space
- Increasing trend of urban green space until the total national satisfactory level is reached
- (+ Improving the ecological quality and connectivity of existing green spaces from biodiversity point of view)
- Increasing trend in green infrastructure solutions

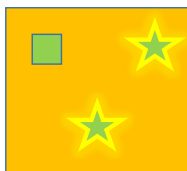


Those cities where the amount of urban green space is not a problem but biodiversity can be improved

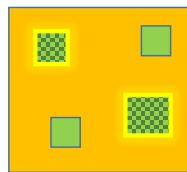
Those cities where the lack of green space is a problem

BIODIVERSITY

I
Increasing the amount of urban green space



II
Improving the ecological quality of urban green spaces



III
Improving the connectivity of urban green spaces network

