

COMMENTARY

A conservation policy as a conservation threat

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The study by Kindvall *et al.* (2022) is an interesting contribution adding to the growing body of scholarship focusing on understanding how European policies affect biodiversity. Biodiversity conservation is a policy objective of the European Union (EU). It is supported by several legal instruments such as the Birds Directive and the Habitats Directive, having led to the creation of a network of protected areas known as the Natura 2000 network. Biodiversity conservation also intersects with the Common Agricultural Policy (CAP) by directly or indirectly affecting millions of hectares in the EU with a total budget of 363 billion euros for 2014–2020, corresponding to roughly 36% of the total EU budget (Pe'er *et al.*, 2019).

Efforts – albeit limited – at making the CAP more biodiversity friendly involve measures such as financial support to grazing in Natura 2000 grasslands, the implications of which Kindvall *et al.* (2022) have assessed in this current paper. Using an endangered butterfly, the marsh fritillary (*Euphydryas aurinia*), as a target species with the associated floral resources, the authors examined how un-grazed and CAP-grazed areas differed. They found that CAP-grazed areas had a substantially (up to 50 times) lower butterfly occurrence probability and population density than non-grazed areas. Estimating these parameters was made possible by an impressive field effort, with the authors having captured close to 15,000 individual insects to estimate differences in abundance. The abundance of orchids and other flowering plants was also substantially lower in CAP-grazed areas.

There are several important policy takeaways from these results. First, the authors address what is usually believed to be the greenest part of the CAP. The CAP has two components, described as pillars. The largest one, pillar 1, corresponds to direct payments given to farmers based on the area farmed and performs poorly for the environment (Pe'er *et al.*, 2017). The smaller pillar 2 is the Rural Development Programme and contains agri-environment-climate measures, such as Natura 2000 support, which are generally considered effective (Batáry *et al.*, 2015). Kindvall *et al.* (2022) performed an evaluation of an example of such a conservation measure and found it threatened targeted biodiversity. It is

worth noting here, that the failure to preserve biodiversity that the authors reveal appears to be a genuine failure and not a consequence of a measure built on greenwashing. For example, Pe'er *et al.* (2019) recommended increasing the share of Natura 2000 payments within pillar 2 (albeit Pe'er *et al.* (2020) stressed the importance of a proper design). While one easy way to perpetuate an environmentally destroying activity is to re-label or re-cast it as environmentally friendly (Erjavec & Erjavec, 2015), this does not appear to be the case here, and this illustrates that good intentions may lead to bad outcomes if not properly designed or monitored.

Second, the paper has also broader implications beyond this particular Swedish case study. Specifically, it illustrates the added conservation value that is brought by investigating the impact of grazing on biodiversity. In many countries, it is politically sensitive to investigate grazing or overgrazing because this issue is believed to polarise the sheep farming industry. In times when research is supposed to be co-constructed in collaboration with relevant stakeholders, such investigations become more difficult: stakeholders whose business model is contingent on damaging biodiversity are unlikely to support research investigating this topic (Andersson & Westholm, 2019).

Next, preserving biodiversity and keeping landscapes open is a point that can be mentioned in debates about large carnivore conservation. The rationale generally is that by threatening the economic viability of livestock grazing, large carnivores may indirectly also threaten grassland biodiversity (Widman, Steen, & Elofsson, 2017). Kindvall *et al.* (2022) focus on one case study in one landscape type and more research is obviously needed, as the impact of grazing on biodiversity (in direction and scale) is likely to be highly context dependent (Filazzola *et al.*, 2020). However, should their results display some generalisability, this argument against large carnivore conservation would be weaker. On the contrary, depredations by large carnivores on grazing livestock could be viewed as an ecosystem service, where, through an economically mediated trophic cascade, wolves would favour insect and plant biodiversity by decreasing the intensity of livestock grazing. Similarly, removing large carnivores not

only reduces the population sizes of European protected mammals, but would also reduce the abundance of insects. Worth noting in Kindvall *et al.* (2022) is that grazing did not appear to be necessary to keep the landscape open.

A follow-up point from Kindvall *et al.* (2022) is whether the recommendations the authors propose (banning grazing in large areas for several years) are likely to be implemented. In my opinion this appears rather unlikely. Current evidence suggests that evidence matters little in environmental public policy making, or at least, that it matters less than the relative political weight of interest groups. In that context, the path taken by the CAP appears to mirror international agreements on biodiversity. Commitments to address biodiversity loss are announced, but the policy reality struggles to match these commitments (see Pe'er *et al.*, 2014, Pe'er *et al.*, 2019, Pe'er *et al.*, 2020, Candel, Lakner, & Pe'er, 2021 for a series of papers suggesting improvements and then expressing disappointments). The existing balance of power in European agricultural politics is simply not in favour of biodiversity friendly changes, although a fine-scale analysis of stakeholder dynamics would be needed to demonstrate this conclusively. If CAP grazing payments have created a niche interest group that benefits from this sector payment, it is unlikely these payments will be easily removed from the CAP.

The authors mention the need for increased flexibility. This is a double-edged sword. On the one hand, there is rarely an effective, one-size-fits-all biodiversity policy (and grazing may help biodiversity in some other contexts). On the other hand, introducing flexibility may in practice start a race to the bottom (Heinemann & Weiss, 2018), opening loopholes or enlarging existing ones. A careful system analysis of the possible unintended consequences would be required. However, an opportunity may have opened with the proposal on nature restoration that the EU Commission presented in June 2022 (European Commission, 2022). This proposal aims for a regulation which would be directly applicable in all EU Member States and cannot be delayed or diluted through transposition in national law as could happen with European directives (Sazatornil *et al.*, 2019). Binding targets might mean that measures intended to restore biodiversity, but demonstrated as having the opposite effect, may be more easily adjusted without starting a race to the bottom. This regulation is for the moment at a proposal stage and Kindvall *et al.* (2022) is a timely contribution that can play a part in informing and fine-tuning a future biodiversity policy in Europe.

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