



**mouvement  
écologique**

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Objection by Mouvement Écologique as part of the public consultation on the 'Nature Restoration Plan'

## **Restoration targets without an implementation strategy: Critical comments on Luxembourg's National Restoration Plan**

The preparation of the draft National Restoration Plan (NRP) for Luxembourg, which is open for public consultation until 6 May 2026, fulfils a regulatory obligation arising from the *EU Nature Restoration Regulation* (NRR, Regulation (EU) 2024/1991). This has been in force since June 2024 and requires all EU Member States to restore at least 20% of their degraded terrestrial and marine ecosystems by 2030. The aim is to bring all ecosystems in need of restoration to a good condition by 2050. As a key implementation tool, Member States must draw up National Restoration Plans (NRPs) and submit them to the European Commission by September 2026. In these plans, they must set out how they intend to achieve these targets at national level.

Mouvement Écologique generally welcomes the participatory approach taken in drawing up the NRP. However, it is highly problematic that key sections of the document, which are central to the assessment of the plan, are still being drafted and have not been made available for public consultation. In addition to this procedural shortcoming, Mouvement Écologique also has significant concerns regarding the content.

Without concrete operators and without concrete proposals for solutions, the NRP risks becoming (yet another) paper tiger that will do little to halt, let alone reverse, the loss of biodiversity, particularly in open-country habitats, as the following analysis shows.

## 1. The PNP3 as a forward-looking instrument: praise and a missed opportunity for the *Restoration Plan*

Years ago, with the **Plan National de Protection de la Nature 3 (PNPN3)**, Luxembourg developed a pioneering, legally binding planning instrument that sets out specific restoration<sup>1</sup> and biodiversity targets for the country. This deserves explicit recognition: Luxembourg is one of the few EU Member States that has **proactively** set itself **ambitious national restoration targets even before the NRR came into force. This foresight was correct and should be commended.**

However, on reading the draft NRP, one gets the impression that the Ministry regards it more as an **administrative document** to be produced in accordance with EU requirements and, accordingly, primarily as a mandatory document.

From the perspective of Mouvement Ecologique, the situation is as follows:

- The **PNPN** forms **the strategic basis of Luxembourg's nature conservation policy** and sets out the **objectives to be achieved**. Its significance is in no way diminished, nor does it lose any of its legal status. It remains the foundation;
- For its part, **the NRP would need to flesh out these guidelines further and supplement them with additional measures.**

**However, the following must be noted here:**

**The PNP3 is already not being implemented to the extent required** to achieve the objectives set out therein for the restoration of threatened habitats and species.<sup>2</sup> A large proportion of the obstacles are known – structural resistance in land management, a lack of financial incentives and insufficient human resources, as well as a lack of cooperation on the part of the Ministry of Agriculture. A genuine NRP would have involved conducting an **honest analysis of these obstacles** and drawing the appropriate conclusions.

Furthermore, the NRP fails in every respect to live up to its claim of contributing to the further elaboration and operationalisation of the PNP3. Why, for example, was the issue of legal obstacles to renaturation measures caused by inadequate provisions in nature conservation legislation (including Bill 8449), as well as in the Water Act and the Ordinance of 22 July 2022 on protected biotopes, not even addressed?

Instead of viewing the NRP as a 'supporting instrument' for the PNP3 and now tackling obstacles in a concrete manner through the drafting of the NRP, reading the document gives the impression that the same objectives are merely to be transferred into a new format, without truly identifying and removing the actual implementation hurdles. Yet this would be the case anyway in the

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<sup>1</sup> The terms 'restoration', 'renaturation' and 'recovery' are used interchangeably in this document. They refer to the process by which degraded, damaged or destroyed ecosystems and habitats are actively or passively restored to an ecologically functional state, with the aim of safeguarding biodiversity, structural diversity and ecosystem services in the long term

<sup>2</sup> Mouvement Ecologique (2024): Biodiversity crisis intensifies: Ministries for Biodiversity and Agriculture must immediately assume their responsibilities. Online: [https://www.meco.lu/wp-content/uploads/2024/04/Biodiversiteitskris\\_HP-1.pdf](https://www.meco.lu/wp-content/uploads/2024/04/Biodiversiteitskris_HP-1.pdf)

A 'mid-term review' of the PNP3 in 2026 would have been appropriate, as Mouvement Ecologique has already called for on several occasions.

- **The objectives of the PNP3 remain valid.** They are necessary to achieve a good conservation status for habitats and species in Luxembourg. The Mouvement Ecologique therefore calls for the NRP, in its final version, not only to set out objectives and general measures, but also, **on the basis of an explicit analysis, to address why the PNP3 objectives have so far been missed**, and to include concrete, institutionally anchored measures to overcome these obstacles.

## 2. Agriculture and pesticide reduction: the crucial omission

**The success of the NRP stands or falls with agricultural practice.** More than half of Luxembourg's land area is used for agriculture. Half of the endangered and/or extinct species in Luxembourg are associated with agricultural land<sup>3</sup>. These species and habitats depend on more extensive, nature-friendly land use and cannot currently survive on most of the land. No restoration target – whether for wetlands, watercourses, grassland or pollinators – can be achieved if the surrounding and even renaturalised agricultural land continues to be farmed intensively and with synthetic chemical pesticides. This is the scientific consensus<sup>4</sup>.

### The silence on pesticides as a structural problem

The draft NRP mentions the need to reduce pesticide use, but only implicitly through references to biodiversity programmes ("*Contrats Biodiversité*") and *eco*-schemes, and not as a standalone, directly targeted objective on the land. On agricultural land outside these programmes – that is, on the vast majority of Luxembourg's agricultural land – **the question of pesticide use remains simply unanswered.**

That is not enough. A nature restoration strategy that fails to identify the main driver of biodiversity loss on agricultural land cannot achieve its objectives. The scientific literature clearly shows that **synthetic pesticides are the main cause of the decline in pollinators, farmland birds, soil organisms and aquatic biodiversity.** A 60 per cent decline in farmland bird populations in Europe over the last 37 years is inextricably linked to the loss of food biomass caused by the intensive use of pesticides in agriculture.

Other EU Member States have already recognised that this link must have consequences, for example by **banning the use of pesticides in Natura 2000 sites.** Luxembourg has not yet taken this step. However, it is unjustifiable that agricultural subsidies funded by public money continue to co-finance **farming practices** that demonstrably **contribute to the decline in biodiversity in precisely those protected areas** that form the **backdrop for the restoration work required under the NRR.** The NRP must clearly state that public funds must no longer subsidise the use of pesticides in and around protected areas – this is also called for in section 4.3.2.1 of the draft. The NRP must set out clear steps on how

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<sup>3</sup> Dale, P., A. Hochkirch, M. Pauly, C. Penny & G. Thakur, 2025. Impact of agriculture on the environment and biodiversity in Luxembourg – A multidisciplinary approach to sustainability. Scientific Research Note PS-002, Chamber of Deputies of the Grand Duchy of Luxembourg.

<sup>4</sup> Pesticide Action Network Europe & BeeLife (2026): Nature Restoration Regulation: Recommendations for National Restoration Plans.

pesticide exposure must be substantially reduced and agricultural programmes reformed accordingly.

### **Not just ‘what is to be achieved’, but ‘how’: the NRP owes us answers**

The NRP merely states that the **use of pesticides** must be reduced. But what is specifically missing is the path to achieving this: how should Luxembourg go about implementing pesticide reduction in practice and reach set targets more quickly?

Specifically, Mouvement Ecologique finds the following to be lacking in the draft:

- **Measurable, time-bound reduction targets** for pesticide use at national level (a reduction in the use of active substances and pesticide toxicity by X% by 2030).
- A **ban on pesticide uses in Natura 2000 sites** and **defined buffer zones** around ZPIN protected areas and ecologically sensitive habitats, as already provided for in the *Sustainable Use Directive* (Art. 12(b)).
- **Independent, farm-wide advisory services** for farmers to help them switch to pesticide-reducing farming systems.

### **The current support mechanisms are insufficient – and the NRP does not specify any improvements**

The draft refers to existing voluntary agricultural support schemes – agri-environment-climate measures, eco-schemes, biodiversity contracts – as key implementation tools. That is all well and good. However, these tools already exist today, and yet the state of biodiversity in Luxembourg remains dire. This clearly shows that the **support programmes are currently evidently insufficient** to achieve the necessary impact across the land. Two studies from 2021 and 2025 clearly demonstrate this; even back then, detailed proposals for improvement were drawn up with a view to nature-friendly yet profitable agricultural practices, but these have not yet been incorporated into the Ministry of Agriculture’s *National Strategic Plan* (PSN)<sup>5</sup>.

The NRP offers a **unique opportunity** here, **one that is being left untapped**: the mid-term review of the PSN and the negotiations on the new CAP post-2027 would be the strategic moment to **consistently align agricultural support with pesticide reduction and the protection of biodiversity**. The NRP should have set out which reforms to the support instruments are necessary to achieve the restoration targets. Instead, it describes existing programmes without identifying their shortcomings or proposing reforms.

Some of the necessary reforms have long been obvious from the studies mentioned above:

- **Make minimum requirements (GLÖZ) more ambitious**: reintroduce GLÖZ 8 (4% non-productive land / fallow land), mandate a crop rotation rate of over 40%. The GLÖZ standards must not be further weakened.

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<sup>5</sup> Kasperczyk, N., Oppermann, R., Chalwatzis, D. (2021): Greater Biodiversity and Environmental Protection through Agriculture: Needs Analysis and Proposed Measures for Luxembourg’s CAP Strategic Plan. FiBL, IFAB.

Kasperczyk, N. (2025): Proposals for the conservation of biodiversity in Luxembourg’s agricultural landscape within the framework of Luxembourg’s National Strategic Plan / PSN 2023–2027. Online: [https://www.meco.lu/wp-content/uploads/2025/05/MECO\\_Biodiv\\_Agrar\\_Bericht\\_ref\\_22052025.pdf](https://www.meco.lu/wp-content/uploads/2025/05/MECO_Biodiv_Agrar_Bericht_ref_22052025.pdf)

- **Align eco-schemes with genuine biodiversity impact:** Only support measures that go beyond standard agricultural practice (e.g. extensive arable farming instead of catch-crop cultivation). Analyse why many eco-schemes are scarcely used and tailor advisory services to effective measures.
- **Expand agri-environment and climate measures (AUKM):** Strengthen multi-year strip programmes on grassland and arable land as a priority instrument.
- **Actively promote organic farming:** Increase conversion and maintenance premiums and reduce competition for funding with eco-schemes for conventional farms.
- **Targeted promotion of nature-friendly food production and rewarding it with fair, cost-covering prices.**
- **Introduce holistic advisory services for farms.**

Above all, however, the NRP lacks the crucial agricultural policy instrument that the NRR itself implicitly calls for: a **well-founded and properly structured public good premium**. Farms that demonstrably provide public goods through their farming practices – so-called ecosystem services – such as biodiversity, clean water and healthy soils – must be substantially better remunerated for this than they are today. The **principle of ‘public funds for public goods’** is the logical core of an agricultural policy that takes the objectives of the Nature Restoration Regulation seriously. As long as area-based payments are made regardless of a farm’s environmental performance, the crucial structural incentive for a land-use-effective biodiversity transition in agriculture is missing. The NRP is the right foundation for enshrining this demand in national agricultural policy in a binding manner.

- Mouvement Ecologique is calling for the final NRP to explicitly set out which **reforms to the PSN and Eco-Schemes** Luxembourg intends to implement as part of the mid-term review and the new CAP – complete with a timetable and measurable biodiversity indicators.

### **3. Renaturation of open-land habitats – lack of measures and transparency**

A major problem with the draft NRP is that the section on measures (Chapter 14) is missing (see point 5 of the statement). This is all the more surprising given that, since 2020, Luxembourg has had a national **strategy for the conservation and restoration of species-rich grasslands**, published by the Ministry of the Environment, which sets out specific recommendations for action, identifies stakeholders and outlines implementation pathways. It would have been an obvious basis for part of the NRP’s action section on open-land habitats. However, it is not addressed in the draft.

Yet it contains concrete approaches that should be adopted:

- **Demonstration farms** for species-rich grassland and/or **specialisation in renaturation** as a new branch of farming, and grassland ambassadors as a practical tool for persuasion towards farmers;
- Concrete **ways of adding value to extensively used grassland** – regional hay exchanges, hay-fed dairy products, marketing of extensively reared meat breeds – that make extensive farming economically viable;

- The **introduction of a public interest bonus** as an incentive – already identified as a priority measure, in NRP not addressed.
- Mouvement Ecologique calls for the measures section (Part C) **to incorporate the Grassland Strategy 2020–2030** and to translate its **recommendations for action** into binding NRP measures.

Another shortcoming of the NRP draft that is difficult to understand is the **spatial framework/search area framework** shown on the **maps** in the annex to the document. These are maps indicating which habitat types are to be restored in which regions. These maps are a central element of the plan, as they form the spatial basis for measures and investment decisions. However, there is no indication of **which data were considered in the selection** – land availability, soil nutrients, hydrological suitability, ownership structures, etc. A **well-founded assessment of these maps** – and thus of a crucial part of the plan – is **not possible** for the public.

- Mouvement Ecologique is calling for **the selection methodology to be made public**, as well as **more detailed, annotated maps** that allow for substantive comments.

#### 4. Indicators: Gaps in the monitoring framework

Two weaknesses in the framework of indicators for monitoring the NRP should be highlighted (Chapters 11 and 12). Firstly, the increase or decrease around **protected biotopes** appears to be missing as a standalone monitoring indicator – even though this would be the most obvious basic indicator of the success of restoration measures and an established data basis already exists in the form of the biotope register.

Secondly, the **indicators for forest ecosystems need to be further developed. Focusing solely on the volume of deadwood (whether standing or lying) is insufficient.** Given that this volume has increased massively – and continues to do so – due to climate-related factors such as drought stress and bark beetle infestation, this indicator is, at best, suitable for documenting the declining vitality of our forests. **Important indicators would include monitoring the biodiversity of site-appropriate natural regeneration, as well as browsing monitoring** linked to appropriate game density and culling quotas. Attention should be paid here to the **natural regeneration** of potentially climate-resilient tree species and the spread of invasive species.

Overall, the section of the NRP concerning forest ecosystems requires further elaboration, as the term ‘forest ecosystem’ encompasses a remarkable diversity of different forest communities. **In 2004, the Luxembourg government committed to placing 5% of all natural forest communities under strict protection (Réserves forestières intégrales, RFI).** This has not yet been fully achieved; accordingly, **a further indicator would be helpful: to document the achievement of this target (4,600 ha)** using the relevant criteria – such as forest community composition, area, etc.

In addition, synergies should be exploited within the framework of the indicators to develop a habitat/species indicator, which is intended to serve as a scientific tool for a GDP-wellbeing.

## 5. An incomplete document in the consultation – a democratic problem

Public participation requires that the public be able to comment on a **complete and finalised draft plan**. Unfortunately, this is not the case with the present document.

**In several key areas, the NRP draft contains no substantive content, but merely a reference to the fact that this is to be supplemented on the basis of the consultation results.** This does not concern marginal details, but points of substantive importance – including, for example, parts of the list of measures (Part C, Chapter 14).

This approach must be regarded as formally flawed, as it fails to recognise the purpose of public participation: the public should not be required to fill key gaps, but rather to evaluate and comment on a fully developed plan. In the case of the NRP, the drafting of the plan has, in effect, been outsourced to the consultation process in key areas. One can only provide limited feedback on an incomplete document.

- In the view of the Mouvement Ecologique, the procedure should actually be suspended until the document is complete (in particular the revision of Chapter 14) and thus complies with the legal requirements of the public procedure.

### Summary & Conclusion

The NRP should not be viewed merely as an administrative exercise, but as an opportunity and a tool for overcoming the implementation hurdles of the PNPN3 – Mouvement Ecologique calls on the Ministry for the Environment to address this by conducting a detailed analysis of the obstacles to the PNPN3 and proposing binding solutions. Furthermore, before it is submitted to the European Commission, the NRP must be fundamentally revised in the following areas, amongst others, and only then made available for public consultation:

- Explicitly set out which reforms to agricultural support instruments (PSN mid-term review, new CAP) are necessary to achieve the restoration targets
- Include pesticide reduction as a standalone, directly addressed objective in the plan – with measurable targets, a clear timetable and concrete instruments for all agricultural land.
- Incorporate the Grassland Strategy 2020–2030 as the substantive basis for the measures section and translate its specific recommendations for action into binding NRP measures.
- Clearly explain how the land area for the restoration of various habitats was determined and make the maps available for inspection on a larger scale.
- Remove legal barriers to the implementation of renaturation measures in the short term.
- Supplement indicators: include biotope area as a baseline indicator; add browsing, game density and young growth to forest indicators; establish synergies with the PIBien-être.