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FACTUAL SUMMARY REPORT ON THE PUBLIC CONSULTATION ON THE STRESS TEST OF THE BIRDS AND HABITATS DIRECTIVES

Disclaimer: This document provides a factual summary of contributions received through the public consultation. It does not represent the official position of the European Commission or its services, and the self-selected responses should not be considered representative of the EU population.

Reading the stakeholder comparisons

The results presented in this summary are not exhaustive, and detailed positions were included for the largest categories of respondents only. Most of the stakeholder figures in this summary show eight groups following the questionnaire categories, and include: (1) national authorities, (2) regional and local authorities, (3) companies, (4) business associations, (5) NGOs, (6) environmental organisations, (7) academic and research institutions and (8) EU citizens (see Figure 1 below). Regional and local authorities are combined. Group sizes differ substantially and are shown beside each row; percentages based on small groups should be read with particular care. Percentages are rounded to one decimal place. All results describe consultation responses and are not statistically representative.

1. Objective and respondent profile

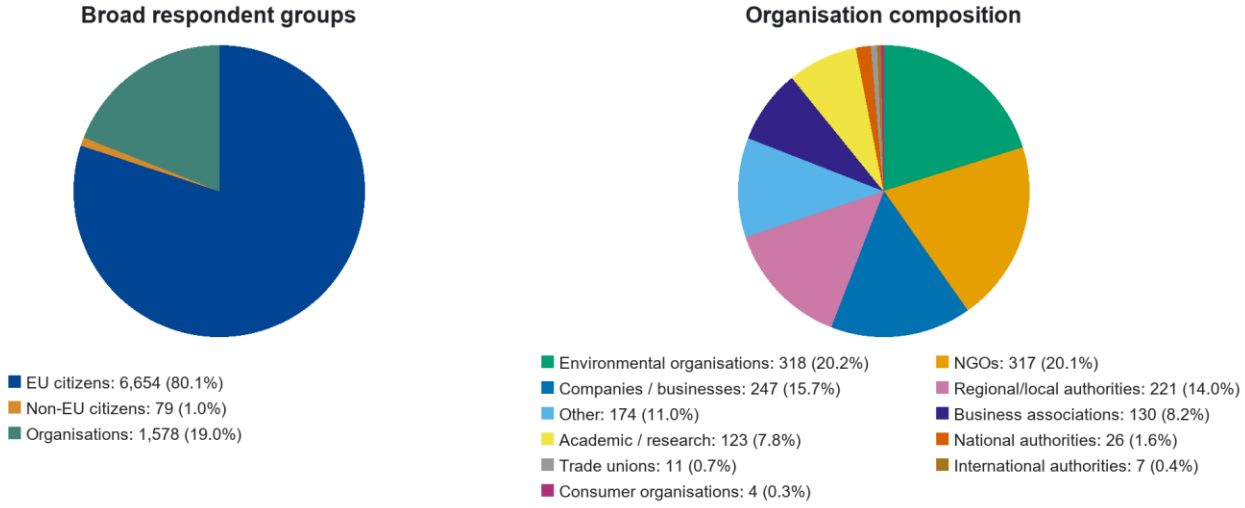
The public consultation was part of the stress test of the Birds and Habitats Directives, and invited citizens and stakeholders to share their views on whether the directives remain fit to achieve their objectives in a cost-efficient way while maintaining the directives' ambition and high standards of nature protection. The consultation included opportunities to share evidence on implementation, costs, benefits, administrative burden and possible simplification. The results presented here are descriptive. Unless stated otherwise, percentages are calculated using the number of respondents within a category to answer each question. For multiple-response questions, totals may therefore exceed 100%.

The consultation received 8,519 contributions. Following a review of coordinated responses, 208 confirmed campaign responses are analysed separately at the end of the report, leaving 8,311 contributions in the main analysis. The second section of the questionnaire, which contained optional detailed questions, was answered by 3,810 respondents. Results describe the views of those who took part and should not be considered representative of the EU population.

Figure 1 displays the respondent profile at two levels. The first pie distinguishes EU citizens, non-EU citizens and organisations. EU citizens made up 80.1% of the main analysis, non-EU citizens 1.0% and organisations 19.0%

The second pie shows the composition of organisations, with public authorities further broken down by their level of governance. (Q2.2 and Q2.9). The largest shares were environmental organisations (20.2%) and NGOs (20.1%), followed by companies (15.7%), regional/local authorities (14%) and others (11%). Business associations and academics were below 10%, and the remaining below 1%.

Figure 1. Respondent profile: broad groups and organisation composition (Q2.2 and Q2.9)

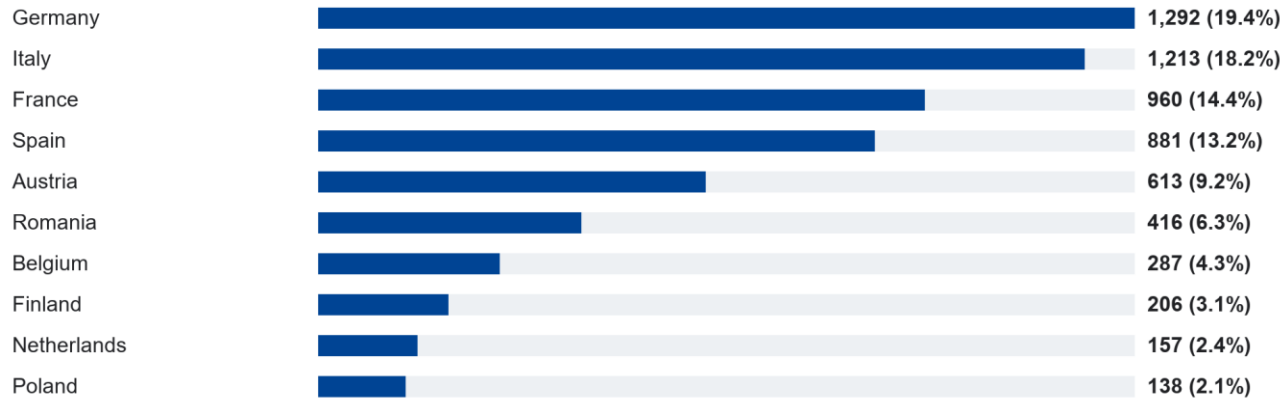


Notes: Counts refer to the 8,311 contributions included in the main analysis, excluding the 208 confirmed campaign responses. Percentages in the left pie are shares of all respondents. Percentages in the right pie are shares within organisations. Public authorities are subdivided by geographical governance level, with local and regional authorities combined.

Respondents could select up to five fields of activity (Q2.17). Companies most often identified agriculture (43.3%), followed by forestry (22.7%), environment (22.3%), nature protection (21.1%), renewable energy (16.2%), hunting (11.7%), tourism (9.7%), energy transmission (7.3%), education (6.5%) and other fields (6.5%). Business associations most often selected environment (32.3%), forestry (30.8%), agriculture (29.2%), nature protection (23.1%), renewable energy (18.5%), hunting (13.8%), water (12.3%) and extractive industry (11.5%); aquaculture, energy intensive industry, manufacturing and transport were each selected by 9.2%. Among NGOs, the leading fields were nature protection (81.1%), environment (73.2%), education (30.6%), agriculture (22.4%), forestry (21.1%), water (17.0%), research (14.2%), hunting (12.0%), renewable energy (10.7%) and other fields (10.1%).

Figure 2 displays the ten countries with the largest shares of EU citizen responses. Germany (19.4%), Italy (18.2%) and France (14.4%) accounted for the largest shares of country origins (Q2.6). More than half (add exact figure) of EU citizen respondents are concentrated in these three countries.

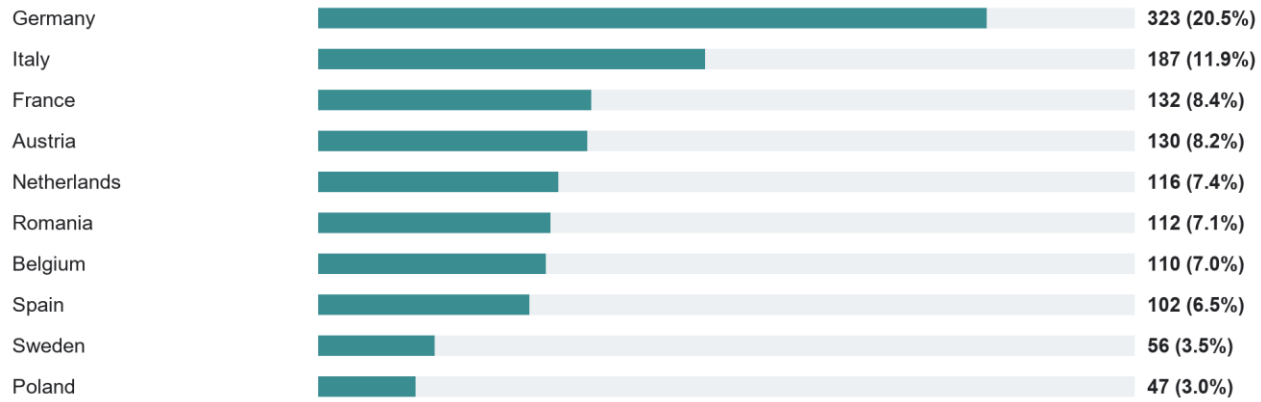
Figure 2. Geographic concentration of EU Citizens (Q2.6)



Notes: Counts and percentages refer to all 6,652 EU citizen respondents in the main analysis. Only the ten most frequently recorded countries are displayed; these shares therefore do not sum to 100%.

Figure 3 displays the ten countries with the largest shares of organisational responses. Similarly, Germany (20.5%), Italy (11.9%) and France (8.4%) are the three countries with the largest share. Together, they represent 40.7% of organisations, which is less concentrated than the country distribution of EU citizens.

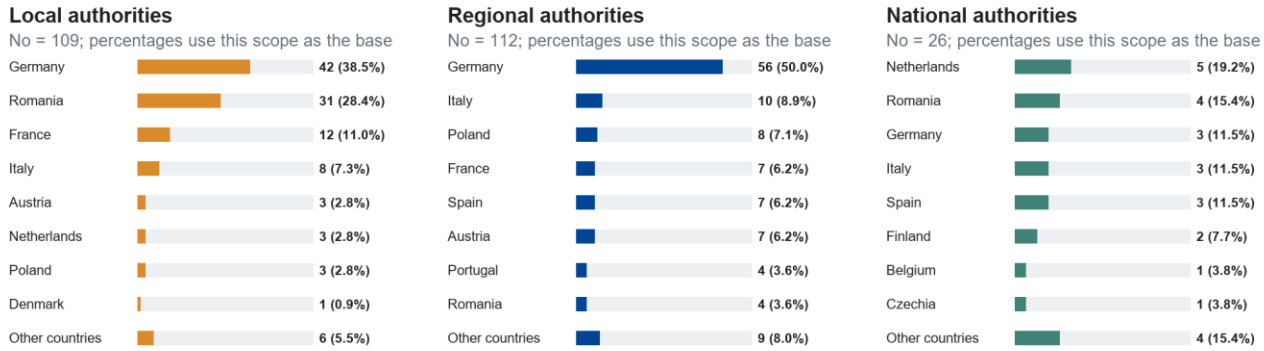
Figure 3. Geographic concentration of organisations (Q2.6)



Notes: Counts and percentages refer to all 1,578 organisations in the main analysis. Only the ten most frequently recorded countries are displayed; these shares therefore do not sum to 100%.

The geographical distribution of public authorities varies by authority level (figure 4). Local and regional respondents were most often from Germany (38.5% and 50%, respectively), followed by Romania among local authorities (28.4%) and Italy among regional authorities (8.9%). The 26 national authorities were more spread across countries, with the Netherlands representing the largest contribution (19.2%).

Figure 4. Geographic concentration of public authorities (Q2.6 and Q2.9)

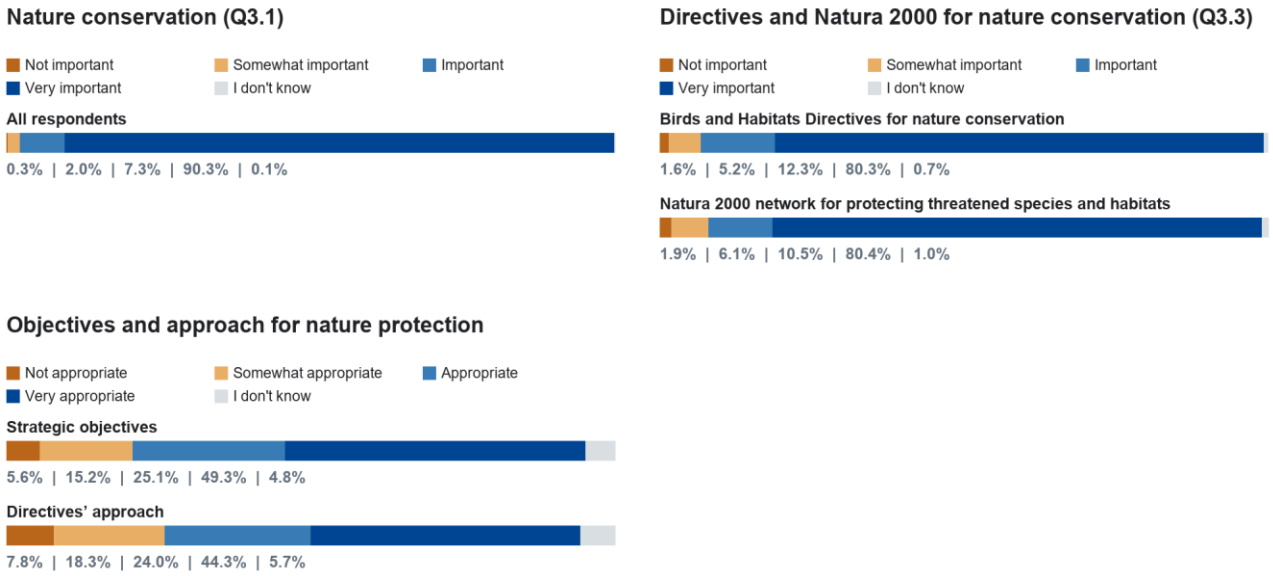


Notes: Counts and percentages refer to all 109, 112 and 26 local, regional and national authorities respectively in the main analysis. Only the nine most frequently recorded countries are displayed. The rest are grouped in 'Other countries'.

2. Importance of nature conservation and appropriateness of the Directives

Figure 5 displays an overall assessment on the importance of nature conservation, the Birds and Habitats Directives and the Natura 2000 network. Almost all respondents considered nature conservation as either important or very important: 97.6% (8,114 respondents) (Q3.1). Similarly, 92.6% (7,693) expressed that the Directives are either important or very important for nature conservation, and 90.9% (7,557) expressed that the Natura 2000 network is either important or very important for protecting threatened species and habitats (Q3.3). Most respondents also considered both the strategic objectives (74.4%) and the Directives' approach (68.3%) to be appropriate or very appropriate. By contrast, 20.7% and 26.1%, respectively, considered them not or only somewhat appropriate for protecting nature in the EU (Q3.4).

Figure 5. Overall answer distributions on importance and appropriateness of the Directives (Q3.1, Q3.3 and Q3.4)



Notes: Percentages refer to all 8,311 eligible respondents. Within each panel, the first and last two response categories are combined; "I don't know" is shown separately. The percentages below each bar follow the legend order. These are overall distributions, not stakeholder-group comparisons. Totals may differ slightly from 100% because of rounding.

3. Effectiveness of the Directives

Figure 6 displays overall views on effectiveness, with 49.2% rating the Directives effective or very effective, 35% (2,905) rated them somewhat effective and 11.4% (946) not effective in protecting nature (Q3.5).

Figure 6. Overall answer distributions on effectiveness (Q3.5)

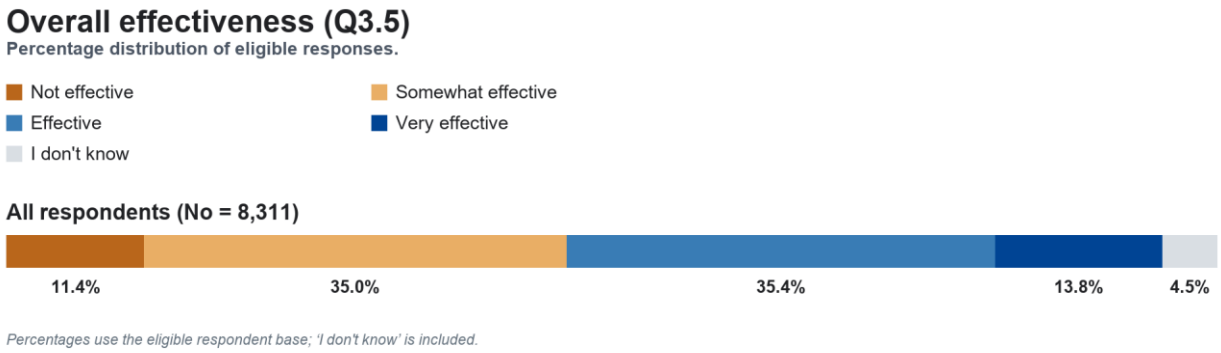


Figure 7 displays the five factors most frequently considered as causing ineffectiveness of the Directives (Q4.2). National implementation had the highest average share across all respondent types (42%), followed by integration of nature conservation into other policies (39.1%), regional implementation (38.3%), local implementation (37.8%) and EU funding under other instruments (35.9%). This average reflects the opinions within each stakeholder group, giving equal weight to each group, regardless of group size. It is therefore not based on the percentage of all respondents.

Environmental organisations and NGOs had similar views on the most important factors contributing to the ineffectiveness of the Directives. Integration of nature conservation into other policies ranked first for both groups (61% and 63.1%), followed by EU funding under other instruments (54.4% and 55.8%). Companies and business associations instead placed greater emphasis on the implementation at national, regional and local level, with higher percentages for business associations. National implementation was identified as an important contributor to ineffectiveness by 63.9% of business associations and 54.5% of companies, compared with 35.1% of environmental organisations and 37.8% of NGOs.

Authorities reported lower shares overall, while citizens showed an evener spread across the five factors.

Figure 7. Factors contributing to ineffectiveness of the Directives (Q4.2)

	No	National implementation	Regional implementation	Local implementation	Integration into other policies	EU funding under other instruments
EU citizens	2,741	46.0%	46.1%	45.3%	39.1%	50.1%
Environmental organisations	228	35.1%	31.6%	32.0%	61.0%	54.4%
NGOs	249	37.8%	36.1%	37.3%	63.1%	55.8%
Companies	132	54.5%	53.0%	50.8%	39.4%	35.6%
Business associations	97	63.9%	58.8%	55.7%	42.3%	16.5%
National authorities	16	31.2%	25.0%	18.8%	12.5%	25.0%
Regional/local authorities	131	29.8%	21.4%	23.7%	23.7%	24.4%
Academic / research	75	37.3%	34.7%	38.7%	32.0%	25.3%

Share within each stakeholder group 0% 100%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of respondents in that group who were eligible for this question. "I don't know" and, where offered, "Not applicable" remain in the denominator. Cells combine "Major contribution to ineffectiveness" and "Minor contribution to ineffectiveness". The five options shown were selected based on the highest averages across all eight stakeholder groups, with each group weighted equally.

Figure 8 displays the five factors most often identified as contributing to the Directives' effectiveness (Q4.2). Environmental organisations and NGOs most often selected scientific knowledge about species and habitats (87.7% and 84.3%) and EU-level funding under the LIFE program (80.7% and 82.3%). Companies' two highest selections were scientific knowledge (55.3%) and the ambition of the Directives' provisions (52.3%); for business associations, they were scientific knowledge (57.7%) and LIFE funding (53.6%). National authorities most often selected scientific knowledge (93.8%) and international cooperation (87.5%). Regional and local authorities most often selected scientific knowledge (74.0%), followed by guidance and best practice (64.1%); LIFE funding and the ambition of the provisions each received 63.4%.

Figure 8. Factors contributing to effectiveness of the Directives (Q4.2)

	No	Scientific knowledge about species and habitats	EU-level funding under the LIFE programme	Ambition of Directives' provisions	International cooperation to protect species and habitats	Guidance and best practice for implementation
EU citizens	2,741	79.2%	71.7%	74.2%	57.9%	70.2%
Environmental organisations	228	87.7%	80.7%	85.1%	78.5%	79.8%
NGOs	249	84.3%	82.3%	79.9%	73.5%	78.7%
Companies	132	55.3%	48.5%	52.3%	45.5%	44.7%
Business associations	97	57.7%	53.6%	37.1%	35.1%	34.0%
National authorities	16	93.8%	62.5%	68.8%	87.5%	68.8%
Regional/local authorities	131	74.0%	63.4%	63.4%	57.3%	64.1%
Academic / research	75	88.0%	85.3%	82.7%	76.0%	70.7%

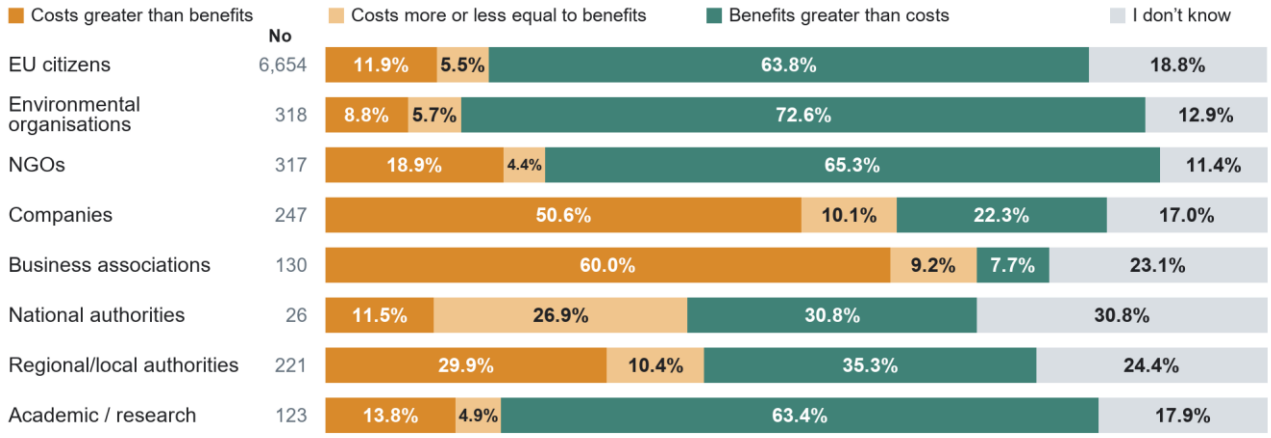
Share within each stakeholder group 0% 100%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of respondents in that group who were eligible for this question. "I don't know" and, where offered, "Not applicable" remain in the denominator. Cells combine "Major contribution to effectiveness" and "Minor contribution to effectiveness". The five options shown were selected based on the highest averages across all eight stakeholder groups, with each group weighted equally.

4. Benefits and implementation costs

Figure 9 displays views on the balance between implementation costs and benefits (Q3.11). Environmental organisations and NGOs, researchers and EU citizens were much more likely to consider the benefits of implementation to outweigh its costs than companies and business associations. This view was shared by 72.6% of environmental organisations, 65.3% of NGOs, 63.4% of academic/researchers and 63.8% of EU citizens, compared with 22.3% of companies and 7.7% of business associations. The majority (50.6%) of companies and 60% of business associations considered the costs greater than the benefits (Q3.11). The views of national and regional/local authorities were more mixed as illustrated below.

Figure 9. Implementation costs compared with benefits (Q3.11)



Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of eligible respondents in that group. "I don't know" responses remain in the denominator. Each row sums to approximately 100% subject to rounding.

Figure 10 displays the share of respondents identifying major benefits from implementation of the Directives. Overall, major benefits were reported most often for wild bird conservation (71.8%) and habitat conservation (70.3%), followed by conservation of other species (68.6%) (Q4.5). EU citizens, academia, environmental organisations and NGOs showed a similar pattern, with high shares identifying major conservation benefits. By contrast, only a minority of companies and business associations reported major benefits across the categories. National authorities were generally more positive than regional/local authorities, particularly on climate resilience and mitigation, on benefits for society and for the economy.

Figure 10. Major implementation benefits by stakeholder type (Q4.5)

	No	Wild bird conservation	Other species conservation	Habitat conservation	Other environmental benefits	Climate resilience / mitigation	Societal benefits	Economic benefits
EU citizens	2,740	75.1%	72.4%	73.5%	69.1%	65.3%	65.0%	61.9%
Environmental organisations	228	77.6%	74.6%	76.3%	67.1%	63.2%	64.0%	61.8%
NGOs	249	78.3%	72.3%	75.9%	68.3%	64.7%	67.5%	65.1%
Companies	132	38.6%	35.6%	37.1%	26.5%	20.5%	20.5%	16.7%
Business associations	97	33.0%	26.8%	29.9%	15.5%	10.3%	15.5%	7.2%
National authorities	16	68.8%	68.8%	62.5%	43.8%	43.8%	31.2%	31.2%
Regional/local authorities	131	55.0%	53.4%	58.0%	38.9%	24.4%	25.2%	15.3%
Academic / research	75	72.0%	68.0%	74.7%	65.3%	56.0%	61.3%	54.7%

Share within each stakeholder group 0% 100%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of respondents in that group who were eligible for this question. "I don't know" and, where offered, "Not applicable" remain in the denominator. Cells show the share selecting "Major benefits". All seven specified benefit categories are displayed; the open "Other" category is omitted. The overall percentages in the text use all 3,810 eligible respondents, including groups not displayed here.

Figure 11 displays stakeholder views on the areas where major implementation costs occur. EU citizens, academia, environmental organisations and NGOs again showed a similar pattern as few of them identified major implementation costs associated with the Directives, broadly in line with EU citizens. A greater proportion of companies reported major implementation costs across all areas, and business associations consistently reported the highest levels of implementation costs, including 79.4% of them reporting major administrative costs and 81.4% reporting major hassle costs (Q4.7). The difference between the two levels of public authority is also notable: regional/local authorities reported major costs more often than national authorities in every category, with the widest gaps for administrative costs (43.5% compared with 12.5%) and hassle costs (35.9% compared with 6.2%) (Q4.7).

Figure 11. Major implementation costs by stakeholder type (Q4.7)

	No	Habitat protection / restoration	Species protection / restoration	Species compensation	Adjustment costs	Administrative costs	Hassle costs	Opportunity costs
EU citizens	2,740	14.6%	14.2%	10.9%	11.4%	13.0%	13.5%	10.3%
Environmental organisations	228	10.1%	13.6%	10.1%	10.1%	12.3%	11.8%	6.6%
NGOs	249	18.1%	18.9%	12.9%	17.3%	19.3%	18.1%	12.9%
Companies	132	56.1%	55.3%	47.0%	55.3%	59.1%	59.1%	53.0%
Business associations	97	73.2%	74.2%	55.7%	74.2%	79.4%	81.4%	69.1%
National authorities	16	31.2%	31.2%	25.0%	25.0%	12.5%	6.2%	6.2%
Regional/local authorities	131	48.1%	40.5%	32.1%	33.6%	43.5%	35.9%	20.6%
Academic / research	75	18.7%	10.7%	9.3%	10.7%	16.0%	14.7%	10.7%

Share within each stakeholder group 0% 100%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of respondents in that group who were eligible for this question. "I don't know" and, where offered, "Not applicable" remain in the denominator. Cells show the share selecting "Major costs" for each of the seven cost categories. "Hassle costs" include costs associated with delays, litigation and redundant legal provisions.

Figure 12 displays the share of respondents that consider each cost category somewhat or very proportionate to the benefits associated with the Directives. EU citizens, academia, environmental organisations, NGOs and national authorities generally reported higher shares than companies and business associations. Business associations recorded the lowest shares, particularly for administrative and hassle costs, both at 8.2%; the corresponding shares among companies were 28.8% and 22.7%. Regional/local authorities were less likely than national authorities to consider costs proportionate across six of the seven categories, especially administrative costs (48.1% compared with 62.5%); opportunity costs were the exception, where regional/local authorities considered costs to be proportionate to the benefits in higher shares than national authorities (39.7% compared with 37.5%).

Figure 12. Cost categories considered somewhat or very proportionate to the benefits associated with the Directives, by stakeholder type (Q4.9)

	No	Habitat protection / restoration	Species protection / restoration	Additional species / compensation	Adjustment costs	Administrative costs	Hassle costs	Opportunity costs
EU citizens	2,741	79.0%	78.8%	76.1%	74.2%	72.0%	68.3%	52.9%
Environmental organisations	228	86.0%	82.9%	78.9%	78.5%	75.4%	71.9%	69.7%
NGOs	249	77.1%	78.3%	73.9%	73.1%	72.3%	69.9%	64.3%
Companies	132	45.5%	43.2%	36.4%	34.1%	28.8%	22.7%	24.2%
Business associations	97	29.9%	24.7%	25.8%	14.4%	8.2%	8.2%	14.4%
National authorities	16	81.2%	75.0%	68.8%	62.5%	62.5%	56.2%	37.5%
Regional/local authorities	131	66.4%	64.9%	62.6%	54.2%	48.1%	42.7%	39.7%
Academic / research	75	76.0%	76.0%	74.7%	64.0%	69.3%	54.7%	65.3%

Share within each stakeholder group 0% 100%

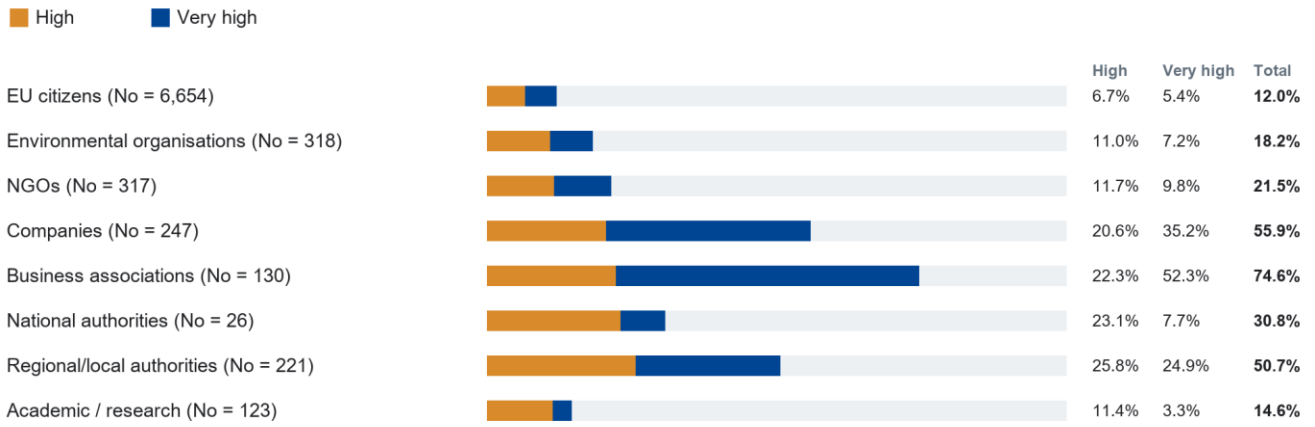
Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of respondents in that group who were eligible for this question. "I don't know" and, where offered, "Not applicable" remain in the denominator. Cells combine "Somewhat proportionate" and "Very proportionate". The percentages concern views on proportionality, not the monetary value of costs. All seven specified cost categories are displayed.

5. Administrative burden

Figure 13 displays the share of respondents who reported a high or very high perception of administrative burden when complying with the Directives. Business associations (74.6%) and companies (55.9%) reported high or very high levels of administrative burden far more often than NGOs (21.5%), environmental organisations (18.2%) and academics (14.6%). Regional/local authorities also reported high or very high

burden more often than national authorities (50.7% compared with 30.8%), while EU citizens were lowest at 12.0% (Q3.12).

Figure 13. High or very high administrative burden (Q3.12)



Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of eligible respondents in that group..'I don't know' responses remain in the denominator. Bars display separately the "High" and "Very high" response categories. All other answer categories are included in the denominator.

6. Appropriate assessments (Article 6(3) and (4) of the Habitats Directive)

Q4.10 asked how efficiently the appropriate assessment procedure prevents harm to protected habitats and species in Natura 2000 areas. Environmental organisations and NGOs were the most positive with 46.5% and 54.6% selecting "very efficient." EU citizens most often chose "somewhat efficient" (36.7%) or "very efficient" (32.4%). Companies and business associations were more critical, with 56.1% and 58.7% selecting not at all or not very efficient; national and regional/local authorities most often said it was "somewhat efficient" (50.0% and 38.9%).

Figure 14 displays the respondents' views about the underlying factors that contribute to inefficiency of the appropriate assessment procedures under Article 6(3) and 6(4) (Q4.11). The majority of EU citizens, environmental organisations and NGOs were closely aligned, most often considering authority capacity and resources (58.4%, 58.8% and 62.7%) and coordination (57.4%, 50.9% and 55%) as underlying causes of inefficiency. A majority of EU citizens and NGOs also indicated implementation practices as a factor of inefficiency (55.8% and 51.8%). A majority of companies and business associations placed an emphasis on all five factors, with the most frequently selected being administrative procedures (64.4% and 75.3%), coordination (63.6% and 73.2%) and implementation practices (63.6% and 73.2%). Both authority groups reported lower shares overall; regional/local authorities nevertheless identified each factor more often than national authorities, particularly authority capacity and resources (45% compared with 6.2%).

Figure 14. Factors that contribute to inefficiency of appropriate assessment procedures (Q4.11)

	No	Authority capacity / resources	Coordination between authorities	Implementation practices	Species / habitat data	Administrative procedures in place at national/regional/local level
EU citizens	2,741	58.4%	57.4%	55.8%	47.0%	29.0%
Environmental organisations	228	58.8%	50.9%	45.6%	41.2%	30.3%
NGOs	249	62.7%	55.0%	51.8%	38.6%	32.5%
Companies	132	65.2%	63.6%	63.6%	55.3%	64.4%
Business associations	97	61.9%	73.2%	73.2%	54.6%	75.3%
National authorities	16	6.2%	25.0%	18.8%	25.0%	18.8%
Regional/local authorities	131	45.0%	32.8%	29.8%	32.8%	24.4%
Academic / research	75	46.7%	44.0%	42.7%	36.0%	28.0%

Share within each stakeholder group 0% 100%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of respondents in that group who were eligible for this question. "I don't know" and, where offered, "Not applicable" remain in the denominator. Cells combine "Major contribution to inefficiency" and "Minor contribution to inefficiency". The five options shown were selected based on the highest averages across all eight stakeholder groups, with each group weighted equally.

Figure 15 displays the factors contributing to efficiency, combining major and minor contributions to efficiency (Q4.11). Environmental organisations and NGOs most often selected EU-level guidance documents (80.7% and 82.7%), followed by the legal formulation of the Directives (79.4% and 80.3%). Companies' two highest selections were EU-level guidance (42.4%) and the legal formulation (37.9%); business associations also selected these most often, at 25.8% each. National authorities selected EU guidance, the legal formulation and CJEU interpretation equally (68.8%). Regional and local authorities most often selected the legal formulation (57.3%), followed by national, regional and local guidance and support (56.5%).

Figure 15. Factors that contribute to efficiency of appropriate assessment procedures (Q4.11)

	No	Guidance documents developed at EU level	Legal formulation of the Directives	Interpretation of legal requirements by the Court of Justice of the European Union	Integration of the appropriate assessment with the environmental impact assessment under the EIA Directive	National/regional/local guidance and support
EU citizens	2,741	71.3%	71.2%	69.1%	68.4%	65.2%
Environmental organisations	228	80.7%	79.4%	77.6%	71.9%	71.1%
NGOs	249	82.7%	80.3%	78.7%	71.9%	73.1%
Companies	132	42.4%	37.9%	34.8%	33.3%	31.1%
Business associations	97	25.8%	25.8%	25.8%	24.7%	22.7%
National authorities	16	68.8%	68.8%	68.8%	62.5%	56.2%
Regional/local authorities	131	52.7%	57.3%	53.4%	51.1%	56.5%
Academic / research	75	77.3%	68.0%	68.0%	68.0%	68.0%

Share within each stakeholder group 0% 100%

Figure 16 displays the respondents' views about the measures that would most improve the functioning of appropriate assessment procedures for the respondents' respective activities (Q4.14). Environmental organisations and NGOs indicated similarly high levels of support for more capacity and upskilling of competent authorities (83.8% and 83.1%), better and more easily available scientific data (76.3% and 77.9%) and better authority coordination (76.3% and 83.1%). Companies and especially business associations placed greater emphasis on coordination and a clearer regional framework (50.8% and 62.9%). Regional/local authorities selected all five improvements more often than national authorities. Citizens also prioritised more capacity and upskilling of competent authorities (75.4%).

Figure 16. Measures that would most improve the functioning of appropriate assessment procedures (Q4.14)

	No	More authority capacity / skills	Better and more available scientific data	Better authority coordination	More stakeholder support	Clearer regional framework
EU citizens	2,740	75.4%	61.9%	59.0%	40.7%	28.8%
Environmental organisations	228	83.8%	76.3%	76.3%	53.5%	24.1%
NGOs	249	83.1%	77.9%	83.1%	47.8%	25.7%
Companies	132	56.1%	65.2%	65.9%	43.9%	50.8%
Business associations	97	51.5%	55.7%	63.9%	52.6%	62.9%
National authorities	16	50.0%	50.0%	50.0%	12.5%	18.8%
Regional/local authorities	131	74.8%	64.9%	52.7%	37.4%	40.5%
Academic / research	75	77.3%	74.7%	68.0%	41.3%	30.7%

Share within each stakeholder group 0% 100%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number eligible for this question, including those who selected no option. Respondents could select several options, so percentages may sum to more than 100%. Cells show the share selecting each option. The five options shown were selected based on the highest averages across all eight stakeholder groups, with each group weighted equally.

7. Species protection and derogations

Q4.17 asked how clear the current species-protection rules under the Birds and Habitats Directives are. Most environmental organisations, NGOs and EU citizens considered them rather or very clear (90%, 89.2%

and 82%). Companies' views were more divided: 44% considered the rules rather or very unclear (12.9% "very unclear" and 31.1% "rather unclear"), while 51.5% considered them rather or very clear. Among business associations, 51.6% considered the rules rather or very unclear.

Q4.18 asked whether the derogation system efficiently addresses challenges associated with respondents' activities. Environmental organisations and NGOs most often said it did so "very efficiently" (51.8% and 56.2%). Among EU citizens, 30.4% chose "very efficiently," while 25.9% said the question was not applicable. By contrast, 62.9% of companies and 74.2% of business associations said it was not at all or not very efficient. Regional/local authorities most often chose "somewhat efficiently" (35.1%).

Figure 17 displays the respondents' views on the measures that would most improve the functioning of species protection and derogations for the respondents' activities, while ensuring that the Directives' objectives are achieved (Q4.19). Environmental organisations and NGOs prioritised better species data (69.3% and 71.9%). This measure was selected by a majority of respondents across all respondent types. Business associations more often selected simplification of procedures to approve derogations at national and regional/local level (74.2%) and population-level rules (80.4%). Companies on the other hand selected more often better and more available data (60.6%), followed by population-level rules (59.1%) and simpler procedures at regional/local level (59.1%). Regional/local authorities selected most of these improvements more often than national authorities. Citizens and academics, like environmental organisations and NGOs, most often selected better species data.

Figure 17. Measures that would most improve the species –protection and derogations system (Q4.19)

	No	Better and more available species data	Population-level rules	Easier procedures to adapt the annexes of the Directives	Simpler procedures to approve derogations at regional/local level	Simpler procedures to approve derogations at national level
EU citizens	2,741	52.9%	24.9%	19.3%	16.6%	13.5%
Environmental organisations	228	69.3%	20.6%	21.1%	14.5%	12.3%
NGOs	249	71.9%	24.5%	20.9%	22.9%	20.5%
Companies	132	60.6%	59.1%	56.8%	59.1%	47.0%
Business associations	97	58.8%	72.2%	59.8%	74.2%	80.4%
National authorities	16	50.0%	43.8%	37.5%	25.0%	25.0%
Regional/local authorities	131	51.9%	48.9%	35.9%	34.4%	25.2%
Academic / research	75	56.0%	41.3%	33.3%	14.7%	16.0%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number eligible for this question, including those who selected no option. Respondents could select several options, so percentages may sum to more than 100%. Cells show the share selecting each option. The five options shown were selected based on the highest averages across all eight stakeholder groups, with each group weighted equally. The five options shown are: more and better publicly available scientific data on species, their habitats and other data to support derogations; more targeted rules focusing on how activities affect species populations rather than individual specimens; an easier procedure to adapt the annexes of the Directives listing the species concerned to technical and scientific progress; simplification of procedures to approve derogations at regional/local level; and simplification of procedures to approve derogations at national level.

Figure 18 displays the highest ranked factors which, in the respondents' views, contribute to the inefficiency of species protection and derogations under the Birds and Habitats Directives (Q4.22). Environmental organisations most often indicated competent authority insufficient capacity (53.5%) and procedures for changing the annexes (50%). NGOs showed an opposite pattern of replies with procedures for changing annexes as highest (57.4%) followed by authority insufficient capacity (48.2%). Companies and business associations placed much greater emphasis on national/regional/local procedures (60.6% and 63.9%), coordination (54% and 50%), and the availability and level of quality of data on protected species and their habitats (47.7% and 48.5%). Authorities generally reported lower concerns on those factors. Regional/local authorities more often pointed to authority capacity (32.8%) and coordination (21%), while national authorities were more likely to identify procedures for changing the annexes (37.5%).

Figure 18. Factors contributing to inefficiency of the species –protection and derogations system (Q4.22)

	No	Authority capacity / resources	Procedures to change annexes	National / regional / local procedures	Coordination between authorities	Protected-species data
EU citizens	2,741	53.0%	45.5%	26.7%	39.7%	20.2%
Environmental organisations	228	53.5%	50.0%	37.3%	36.0%	26.3%
NGOs	249	48.2%	57.4%	34.1%	33.3%	21.7%
Companies	132	56.8%	49.2%	60.6%	54.5%	47.7%
Business associations	97	52.6%	50.5%	63.9%	50.5%	48.5%
National authorities	16	25.0%	37.5%	12.5%	12.5%	25.0%
Regional/local authorities	131	32.8%	26.7%	18.3%	21.4%	22.9%
Academic / research	75	30.7%	33.3%	26.7%	28.0%	20.0%

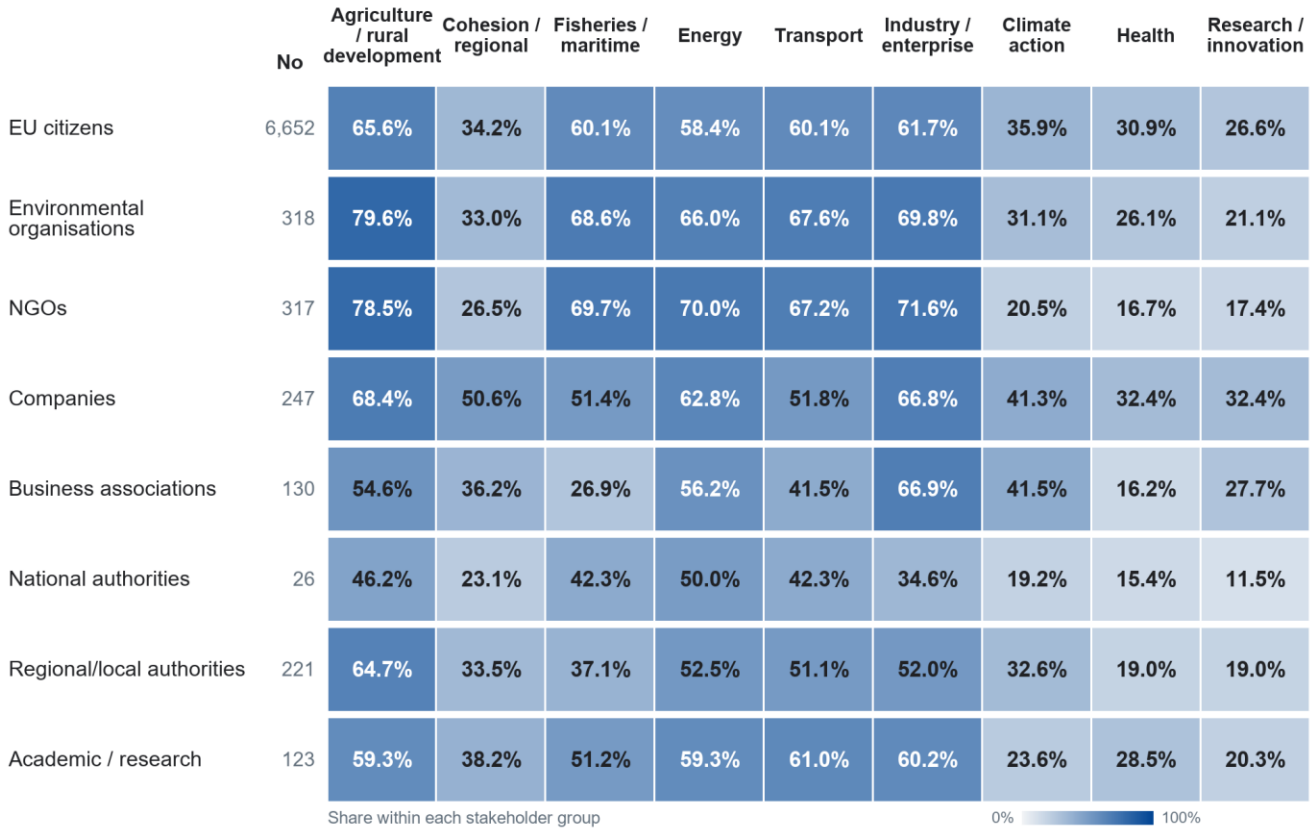
Share within each stakeholder group 0% 100%

Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of respondents in that group who were eligible for this question. "I don't know" and, where offered, "Not applicable" remain in the denominator. Cells combine "Major contribution to inefficiency" and "Minor contribution to inefficiency". The five options shown were selected based on the highest averages across all eight stakeholder groups, with each group weighted equally.

8. Policy coherence

Figure 19 displays the share of each stakeholder group that considered the other EU policy areas not coherent at all or not very coherent with the Directives (Q3.15). Across the displayed stakeholder groups, overall concern was highest for agriculture and rural development (64% on average across all stakeholders) and industry/enterprise (60.5%), and lowest for research and innovation (22.0%) and health (23.1%). Environmental organisations and NGOs showed high concern about agriculture (79.6% and 78.5%), fisheries and maritime (68.6% and 69.7%), industry and enterprise (69.8% and 71.6%), energy (66% and 70%) and transport (67.6% and 67.2%). Companies and business associations reported relatively high concerns about industry and enterprise (66.8% and 66.9%) and energy (62.8% and 56.2%); companies were more concerned about cohesion and regional policy (50.6%) and about agriculture (68.4%). Business associations reported less concern than environmental organisations and NGOs about agriculture, fisheries and maritime, and transport. Regional and local authorities generally reported more concern than national authorities, except for fisheries and maritime (Q3.15).

Figure 19. Policy coherence concerns by stakeholder type (Q3.15)



Notes: Percentages are to be interpreted within each stakeholder group; 'No' is the number of eligible respondents in that group. "I don't know" responses remain in the denominator. Cells combine "Not coherent at all" and "Not very coherent". All nine policy areas in this question are displayed. The order follows the questionnaire and does not imply a ranking.

9. Open questions

The consultation's open questions allowed respondents to explain their answers, identify implementation problems and provide examples of possible solutions or existing good practices. The responses cover the three main topics of the stress test[1]: (1) Application of Article 6 of the Habitats Directive, with a focus on the appropriate assessment procedure for Natura 2000 sites; (2) Policy coherence, stakeholder participation, funding support and governance (including monitoring and reporting); and (3) Species protection and derogations, and procedures for adapting the annexes to scientific and technical progress. They provide qualitative insights into how the Directives operate in practice and where implementation could be improved.

Two open questions (Q4.16 and Q4.25) focused specifically on solutions for reducing costs and administrative burden: one relating to assessments under Article 6 and the other to species protection and derogation procedures. Business associations, NGOs and environmental organisations had the highest rates of contributions to these questions with more than 50% of organisations in each of those categories replying. For Article 6, recurring themes included clearer guidance, clearer deadlines and expected timeframes for the steps in the appropriate assessment process and better coordination between the authorities involved. Respondents frequently suggested standard documents, digital applications and a single point of contact. Early discussions between applicants and authorities were also considered useful for agreeing on the necessary studies and avoiding repeated information requests later in the process.

Better access to reliable ecological information emerged across topic 1 and 3 of the stress test. Public databases covering Natura 2000 sites, conservation objectives and protected species were seen as a way to reduce duplicate surveys and identify risks earlier.

For species protection, respondents often called for clearer derogation criteria and simpler arrangements for recurring or low-risk activities. Other suggestions included standard mitigation measures, regional species-management plans and guidance tailored to particular sectors or species. Codes of conduct for managing temporary habitats in active quarries were presented as positive examples of cooperation that can maintain species protection while reducing uncertainty for operators. Preventive measures, such as

[1] Stress test of the Birds and Habitats Directives - Green Forum

protection zones around nesting sites and support for livestock protection, were also considered preferable to dealing with conflicts only after they arise.

Overall, the open responses suggest that administrative burden is often linked to fragmented procedures, incomplete information and insufficient administrative capacity.

10. Documents received

The public consultation received 70 uploaded documents from 67 respondents. The submissions are mainly formal consultation responses and position papers on the Birds and Habitats Directives, supplemented by supporting evidence, technical and legal analyses, policy briefs, research articles, case studies, implementation examples, letters and endorsements. They were submitted by a diverse range of respondents, including 18 EU citizens, 14 NGOs, 8 environmental organisations (submitting 10 documents), 10 business associations, 6 companies or businesses, 7 public authorities, 3 academic or research institutions and 1 respondent classified as Other.

11. Youth position

Among the 480 EU citizens under 30 in the main analysis, 92.9% considered nature conservation very important. Most rated the Birds and Habitats Directives (93.5%) and Natura 2000 (93.8%) important or very important (Q3.1; Q3.3). Views on effectiveness of the Directives were more mixed: 58.5% considered the Directives effective or very effective, 30.2% somewhat effective and 7.3% not effective (Q3.5). Of the 180 who gave one of the latter two ratings, 72.2% cited problems with implementation and 56.7% insufficient funding or capacity (Q3.6). Nearly two thirds of the full age group (64.8%) considered the benefits greater than implementation costs (Q3.11).

The three organisation-level youth submissions (one of which represented a coalition of nine organisations) represented different views, with environmental organisations, and one agricultural sector organisation. All rated the Directives important or very important, but views on effectiveness and costs differed. The environmental submissions raised issues linked to lack of implementation, lack of funding and enforcement, with one also pointing to limited ambition. The agricultural submission raised issues linked to unclear rules, differing national interpretations, and the costs and delays of assessments for farm investments.

12. Campaigns

The campaign review identified ten groups: eight based on identical closed-question patterns and two based on near-complete agreement in substantive open answers. Together, they represent 208 unique contributions. Eight respondents appeared in more than one group. All 208 were confirmed as campaign responses and excluded from the main analytical base. The campaigns were not generally identifiable as being led by one type of organisation. Most responses were submitted as EU citizens (211), with only a small number linked to named NGOs (3) or a business association. Of the campaign responses, 124 entered Section 2 for more detailed contributions.

Below is a brief summary of each campaign:

- **The largest campaign comprised 45 respondents, mainly from Spain, including 43 EU citizens, one non-EU citizen and one NGO.** Their responses strongly supported the existing Directives and considered their benefits greater than implementation costs. They attributed permitting difficulties to insufficient staffing, funding, coordination and enforcement. Their shared proposals included early, science-based planning, digitalisation, accessible ecological information and stronger administrative capacity. For species protection, they supported sensitivity maps and sector-specific guidance. They warned that changing the rules or generalising exceptions could reduce legal certainty and create additional bureaucracy, and criticised other policies, particularly agricultural funding, for supporting activities harmful to nature.
- **A campaign of 33 EU citizens from Austria** who all identified **hunting** among their interests. They considered nature conservation important and the Directives' strategic objectives appropriate but rated the approach only somewhat appropriate and the results somewhat effective. All considered implementation costs greater than benefits and administrative burden high. Their concerns included inadequate stakeholder involvement, weak results from Natura 2000 management and insufficient recognition of social, cultural and local considerations. Written comments criticised strict and complex reporting requirements and short reporting intervals. They called for greater recognition of

hunters' conservation contribution and more proportionate arrangements for species with favourable conservation status.

- **A campaign of 30 respondents from several countries, predominantly Belgium, included 27 EU citizens, two NGOs and one business association.** Their responses expressed strong confidence in the Directives: they considered the objectives and approach very appropriate, the provisions clear, sufficiently strict and ambitious, and Natura 2000 management capable of delivering positive results. All considered the Directives to be effective, benefits greater than costs and administrative burden very low. They considered economic and social considerations well reflected in implementation. Their criticism concerned weak coherence with agriculture, fisheries, energy, transport and industry policies. They did not answer the more detailed implementation questions.
- **A campaign of 26 EU citizens from France.** They considered the Directives effective and their benefits greater than costs, while rating appropriate assessments somewhat efficient. Their selected priority for improving assessments was increased capacity, resources and skills within competent authorities. Written responses attributed delays and difficulties to insufficient administrative support, funding and coordination, and inconsistent implementation. They defended the legal framework and opposed weakening the Directives. Examples concerning species protection included French information platforms, biodiversity guidance and observatories intended to improve access to knowledge and support project developers.
- **A campaign of 21 EU citizens from France.** Their responses supported the Directives and identified greater authority capacity as the principal improvement to appropriate assessments. They expressed strong concerns about policy coherence, rating agriculture, fisheries, transport and industry policies as not coherent at with the Directives' objectives. Written contributions called for stronger political commitment, consistent implementation and enforcement, and better coordination between authorities. They emphasised continued support for the LIFE programme and greater allocation of EU funding to biodiversity. Administrative burden and derogation efficiency were marked as not applicable, and respondents indicated that they did not handle species-protection procedures in their activities.
- **A campaign of 15 EU citizens from Poland.** They considered the Directives effective, administrative burden very low, and both appropriate assessments and derogation procedures very efficient. Their responses supported maintaining existing protections while improving the resources and information available for implementation. Written proposals included strategic spatial planning, early stakeholder involvement, adequate funding for conservation bodies, digitalisation and accessible ecological data. They cited species-sensitivity maps and guidance on wind-farm impacts on birds as ways to improve consistency and predictability. They also warned that reopening the Directives or generalising derogations could undermine legal certainty and increase administrative burdens.
- **A Spanish-language campaign of 15 EU citizens, mostly from Spain.** Their shared written responses defended appropriate assessments as necessary and efficient safeguards and attributed difficulties to uneven implementation and limited administrative and financial capacity. They supported early, transparent planning, stronger coordination, digital information systems and better scientific data. For species protection, they proposed sensitivity maps and guidance developed jointly with businesses and conservation organisations. They considered the Directives fit for purpose and argued that the stress test should identify better implementation practices within the existing framework. Their answers also indicated that benefits outweighed costs and administrative burden was very low.
- **A predominantly French-language campaign of 11 EU citizens, mainly from Belgium and France.** They considered nature conservation, the Directives and Natura 2000 very important, and the Directives' objectives and approach very appropriate. Their responses described the provisions as clear, sufficiently strict and ambitious, and Natura 2000 management as delivering positive results. All considered the Directives to be effective, benefits greater than costs and administrative burden very low. They nevertheless identified limited coherence with agriculture, fisheries, energy, transport and industry policies, alongside stronger coherence with climate and health policies. They did not answer the detailed implementation section.

- **A German-language campaign of ten EU citizens, eight from Austria and two from Germany.** Their responses expressed strong support for both the legal framework and its implementation. They considered the Directives effective, their provisions clear, sufficiently strict and ambitious, EU enforcement mostly effective, and Natura 2000 management beneficial. All considered benefits greater than implementation costs and administrative burden low. They considered economic, social and cultural considerations well reflected in implementation. Their main reservations concerned policy coherence, particularly with agriculture, fisheries and industry, which they rated as not coherent at all. They did not answer the detailed implementation section.
- **A campaign of ten EU citizens from Spain**, eight of whom also belonged to the largest campaign. They considered the Directives effective, administrative burden very low, and assessment and derogation procedures very efficient. Their written contributions emphasised insufficient staffing, funding, enforcement and coordination as the main obstacles. They supported early agreement on project requirements, strategic planning, digitalisation and accessible scientific information. Species-sensitivity maps and jointly developed guidance were proposed to help projects avoid risks and improve consistency. They opposed weakening the Directives and called for stronger implementation and scrutiny of public funding that supports activities harmful to nature.