

BIODIVERSITY

Dynamic ecosystems for dynamic economies

Gypsum industry's comments on the EU Biodiversity Strategy 2021-2030

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Context

Nature and biodiversity are critical for our existence as well as our economies. Biodiversity loss is a major challenge in our societies, with the expansion of human presence and activities and the difficulties to manage the impact of such activities on ecosystems. The EU Biodiversity Strategy for 2030¹ rightly recognises the extent of the challenge and proposes several actions to remedy it. Eurogypsum, the European federation of national associations of producers of gypsum products, welcomes the European Commission's ambitions on biodiversity and would like to present some considerations on the Strategy.

The crucial dilemma facing our modern societies is to reconcile nature protection with our aspirations in terms of socio-economic development and quality of life. As much as we all feel concerned by endangered species and habitats, we are not ready to give up the comfort and wealth of modern lives or return to pre-industrialisation times. Our European continent has been shaped by centuries of economic activities, which have deeply changed our landscapes, e.g. through farming, resource extraction and urbanisation. The challenge is therefore how a sustainable management of our activities can promote biodiversity and allow our societies and economy to grow further.

The European Commission has set itself an ambitious pathway with the European Green Deal², aiming to *"transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use"*. This level of ambition will require access to strategic resources. The renovation of Europe's building stock to high efficiency standards is a major element to achieve Europe's climate neutrality objectives, which is duly considered in the envisioned Renovation Wave. This initiative, like others in different sectors, will require a sustainable access to resources. Circular economy practices, as in our case the recycling of gypsum waste from construction and demolition, will play an ever-increasing role. As more buildings are built than demolished, these practices will complement but not replace the need for a sustainable sourcing of primary materials.

The access to domestic resources of raw materials is of crucial importance in Europe: As the Covid-19 crisis showed in the field of protective equipment, over-reliance on third countries for the supply of strategic materials can be a threat. Sourcing materials locally also enables the application of strictest environmental, health and safety standards and minimises emissions from transport.

Eurogypsum is convinced that securing the supply of strategic resources and promoting biodiversity are not mutually exclusive. Our sector's experience with ecosystem management in extractive activities can exemplify it.

¹ European Commission: "EU Biodiversity Strategy for 2030. Bringing nature back into our lives", 20 May 2020. COM(2020)380.

² European Commission: "The European Green Deal", 11 December 2019. COM(2019)640.

Biodiversity and gypsum

The gypsum sector has a good and long-lasting track record in managing biodiversity in quarries³. As demonstrated in many gypsum quarries across Europe, the very nature of quarry operations, legal obligations and industry commitments contribute to preserving, restoring and creating ecosystems. Even operating quarries can have a positive effect on biodiversity through management concepts for temporary nature.

Operating and renatured quarries can actually positively contribute to green infrastructures and strengthen corridors as steppingstone biotopes.

Our experience also shows that open quarries have a significant value for biodiversity, which particularly endangered and European protected species of the early succession stages and dynamic habitats can benefit from.

Operating and openly closed quarries with their virgin soils, slopes, scree heaps and crevices, as well as the species-rich ruderal vegetation, offer perfect habitats especially for xerothermophile wildbees.

As pesticide-free areas with many extensively used areas, quarries can form ecotones, which increase the heterogeneity of the agricultural landscape and promote occurrence and variety of insects. Bigger quarries can serve as refuges and maintain populations that have already been lost due to the intensive agricultural use in the surroundings⁴.

Our views on the Strategy

While we fully share the European Commission's concerns with biodiversity loss and support the objective of halting it, we would make the following comments as to the preferred approach to reach this objective.

A cooperative approach is required:

- There is a shared responsibility between industries, public authorities and civil society to promote biodiversity in a way that allows local and global economic development.
- Dialogue between communities, NGOs and economic operators has a positive role on biodiversity promotion.
- We should avoid taking a confrontational approach in the strategy, implicitly differentiating between 'green-minded' citizens/NGOs on the one hand, and 'intrusive' businesses on the other hand. This simplistic dichotomy misses the point and is counterproductive. Proper action to maintain ecosystems requires a cooperative approach.
- In this sense, we fear that the proposals made in the Strategy with regards to civil society's compliance watchdog actions and access to justice may further encourage 'Nimby' approaches, misusing biodiversity concerns and neglecting Europe's strategic objectives. Instead of encouraging lengthy legal proceedings, we would argue that the conditions should be set to strengthen the staffing and professional competence of responsible national (or regional/local) authorities, which are in our view the most legitimate organs to address these matters.

³ Eurogypsum: *Biodiversity Stewardship in Gypsum Quarrying: Our Best Practices*. An updated version will be downloadable soon from www.eurogypsum.org. You can consult the older version [here](#).

⁴ References:

- Beneš J, Kepka P, Konvička M (2003) Limestone quarries as refuges for European xerophilous butterflies. *Conserv Biol* 17:1058–1069.
- Heneberg P., Bogusch P., Rehounek I. (2012): Sandpits provide critical refuge for bees and wasps (Hymenoptera: Apocrita). *J Insect Conserv.*
- Lenda M., Skorka P., Moron D., Rosin ZM, Tryjanowski P. (2012) The importance of the gravel excavation industry for the conservation of grassland butterflies. *Biol Cons* 148:180–190.
- Růžicková J.& Hykel M. (2019): Habitat mosaic of gravel pit as a potential refuge for carabids: a case study from Central Europe. *Community Ecology* 20(3): 215-222.
- Schütte K., Hallas O., Herrmann H. (2018): Quarries as stepping stones and corridors for bees and wasps - Inventory of and improvement for bees and wasps. *Quarry Life Award – final report*, p. 15.

Europe needs a modern vision of biodiversity:

- Our modern - largely urbanised - societies and cultural landscapes **are not static**. Neither are ecosystems and biodiversity static, nor have they ever been. A modern approach should therefore not only make increasingly stringent requirements for protected areas and issue new bans, but also try to get biodiversity back into the area and reconcile it with human activities. For this purpose, usage-integrated concepts that reward the promotion of biodiversity must be pursued.
- In particular for the **extraction of mineral raw materials**:
 - the concepts for ‘usage-integrated biodiversity promotion’ and ‘temporary nature’ must be further developed and applied⁵;
 - incentive systems are needed to promote the consideration of nature conservation aspects in restoration planning;
 - operating and closed quarries must be integrated into a European green infrastructure; and
 - there should be a regular use of quarries for ‘assisted migration’ to support the adaptation of species to climate change despite landscape fragmentation⁶.

How to reconcile Europe’s strategic goals and biodiversity promotion?

Extractive industries are facing a contradiction between the concept and realities of Natura 2000 areas. In the spirit of the EU Habitat Directive and in our experience on the ground, biodiversity protection and economic activities are not mutually exclusive. It is regrettable that the procedures to request extraction permits across Europe too often show a more restricted, sometimes arbitrary interpretation of the rules, leading to lengthy or totally blocked permitting processes. If this situation with the local interpretation of protected areas were to continue, the designation of additional protected areas and their increased protection could represent a serious risk of raw material extraction being moved abroad, for lack of sufficient authorised domestic supply. A large part, if not all of the material processing chain, could follow subsequently and relocate outside the EU, close to the supply sources.

A holistic approach is needed for biodiversity management in Europe’s raw material supply. The import of mineral raw materials would have negative effects on the environment: The increased extraction in countries without EU standards would contradict many of the goals enshrined in the Biodiversity Strategy and would be unfair from the perspective of global goods distribution and generational justice. The dependency on non-European raw material suppliers for the construction sector would also have significant negative effects on the Green Deal’s objectives, the EU’s economic sovereignty and recovery.

Therefore, we believe that the EU has a leading role to play in ensuring this combination of nature protection and strategic economic activities. While the environmental impacts of individual extractive projects must be considered locally, with involvement of all relevant actors to minimise negative aspects, only an EU-level strategic input can avoid ‘Nimby’ effects on the ground. Furthermore, clear and objective criteria are needed for any increase in the share of protected areas.

We are also convinced that protected areas should have clear management plans, considering habitats and economic development objectives, and including concrete measures for the promotion of biodiversity. Stakeholders’ involvement in drafting these plans would make them more successful. These plans should be decisive on the granting of extraction permits and would also support local administration, the industry and developers.

Biodiversity management is a serious challenge for our societies – and a daily one for raw material supply operators. Collective efforts are needed between authorities, economic and civil society actors, to allow for the further development of lively ecosystems and active economies. The European gypsum sector will continue to contribute to these objectives in close cooperation with all stakeholders. We thank European institutions and stakeholders in advance for taking these comments into account in the roll-up of the Biodiversity Strategy.

⁵ An example with the “LIFE IN QUARRIES” project (www.lifeinquarries.eu) or the Bavarian amphibian project (www.natur-auf-zeit.de).

⁶ An example with the “LIFE-BOVAR” project (www.life-bovar.com) or the “yellow-bellied toad” project (www.projekt-gelbbauchunke.de).

Eurogypsum is a European federation of national associations of producers of gypsum products (i.e. plaster and plasterboard). It is one of the few fully integrated industries (from cradle to cradle) within the construction products field. The companies which mine gypsum also process it and manufacture the value-added products and systems used extensively in construction and other industries.

With a turnover of EUR 7 billion, the European gypsum and anhydrite industry operates some 160 factories and 154 quarries and generates employment directly to 28,000 persons and indirectly for 300,000 persons. The Gypsum industry provides jobs to 1,100,000 plasterers and plasterboard installers. It trains around 25,000 persons per year across Europe.

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