



Union Européenne des Producteurs de Granulats  
Europäischer Gesteinsverband  
European Aggregates Association

# Initial recommendations

17 February 2017

## UEPG initial recommendations for the development of an Action Plan to follow up the Fitness Check of the Nature Directives

UEPG supports the objectives of the Birds and Habitats Directives and is committed to contribute to Nature and Biodiversity conservation. UEPG Members are convinced that responsible aggregates production is compatible with a favorable conservation status of habitat types and species.

Aggregates extraction is not only compatible with biodiversity, but has the potential to create it. A number of Natura 2000 areas have been designated on former extraction sites, which demonstrates this. We have witnessed a great variety of situations from one country – or one region – to another, leading to uncertainties for business. We believe that there is potential for improvement, in particular with Natura 2000, often considered as “no go areas” and how to deal with protected species on-site.

UEPG is in favor of a more flexible and proportionate implementation based on the European Commission Guidance for the Non-Energy Extractive Industry (NEEI) because we believe that the European Aggregates Industry operates sustainably and can make a net contribution to biodiversity.

UEPG welcomes the call for a development and application of “smart implementation approach to support national, regional, local authorities and stakeholders to avoid unnecessary costs and burdens”.

The Communication from the European Commission on "An Action Plan for nature, people and the economy" could however be more specific and mention some interesting areas of investigation such as:

- **Implementation of a more evolutionary approach towards biodiversity management:**
  - Biodiversity protection can benefit from a more dynamic management. Although pits and quarries, by their very specificities, can be natural biodiversity havens, an ad-hoc management (e.g. Biodiversity Management Plans) helps by creating new habitats and attracting pioneer species. The sector can provide a solution for areas which, although designated as Natura 2000, are degraded and no longer of a high biodiversity value. By allowing a temporary activity in that area, such as extraction, the sector will gradually restore the area and implement plans enabling the development of an area of a high biodiversity value. Concepts such as the Dutch “Temporary Nature” are relevant as they allow for both nature protection and economic development.



Union Européenne des Producteurs de Granulats  
Europäischer Gesteinsverband  
European Aggregates Association

- There are existing EU funding schemes addressed to nature and biodiversity via LIFE programme. The objective being to contribute to the implementation and development of EU environmental policies and legislation through co-financing projects with European added value. We have good examples in our industry such as the FEDIEX “Life in Quarries” Project on the dynamic management of biodiversity in quarries

#### - **Harmonisation of interpretation of concepts**

- Some challenges met with the implementation of the Birds and Habitats Directives come from an over precautionary approach which could be partly solved by the clarification of some key concepts of the Directives, such as “imperative reasons of overriding public interest”, “significant effects” and “alternative solutions”. National (or regional) interpretations, European Court rulings and European Guidance, have led to several interpretations and therefore discrepancies. Sectoral Guidance is helpful, but often disregarded, sometimes caused by a lack of resources and information of the competent authorities.
- A solution to this challenge could be to promote better cooperation between stakeholders involved in the decision-making and consultation process. A good example would be the European Network for Sustainable Quarrying and Mining, which had their first meeting on Natura 2000, organised on 9 February 2017, in Madrid. <https://ec.europa.eu/growth/tools-databases/eip-raw-materials/en/content/european-network-sustainable-quarrying-and-mining>

#### - **Innovative ways for a better implementation**

- Some competent authorities may focus too much on the protection of individual species, while the important objective is the integrity of the population or of the habitat. One way to improve this would be to develop methodology/technical guidance on evaluation of impacts on the populations of a selected number of protected species, relevant to our industry (e.g. great crested newt) and develop practical documents for minimisation of these impacts so that favorable conservation status can be achieved. A policy level working group on ‘solutions’ to implementation barriers of the nature directives (EC/NGOs/Industry) might resolve several difficulties or barriers.

#### - **Transparency:**

- It is important to improve the transparency of the Natura 2000 site management plans (both in the design and the implementation phases), to fairly involve the economic sectors that are affected by them. In view of the public interest and consultations, it is essential to involve industries in the decision-making and consultancy process as a matter of transparency and good cooperation between stakeholders.



Union Européenne des Producteurs de Granulats  
Europäischer Gesteinsverband  
European Aggregates Association

- **UEPG contribution to biodiversity**

- UEPG Members are contributing to the Circular Economy through the full life cycle of the quarry or pit: excellence in daily operations, complete use of the reserves, recycling and restoration. For further details please refer to our UEPG Biodiversity brochure. (<http://www.uepg.eu/uploads/Modules/Publications/uepg-biodiversity-brochure.pdf>)
- UEPG involvement in the European Commission Business & Biodiversity Platform, the many projects on promoting the compatibility of aggregates extraction with biodiversity and nature protection through “Temporary Nature”, “Life in Quarries” and “Nature after Minerals” are examples of good practices and best techniques applied to manage biodiversity. More than 150 biodiversity cases studies are available on the UEPG website ([www.uepg.eu](http://www.uepg.eu))
- UEPG represents the largest non-energy extractive industry through national aggregates associations and producers in 27 European countries including 15,000 companies (the majority of which are SMEs) operating on 25,000 extraction sites, providing jobs for more than 200,000 direct and indirect employees. We believe the vast network of European Aggregates Industry and aggregates extraction sites can contribute to make a difference.