

Policy Brief


# Barriers and Levers for Transformative Policymaking



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# Introduction



Biodiversity in Europe continues to decline despite the EU's international commitments, policy efforts and initiatives. Overall trends across terrestrial, freshwater and marine ecosystems remain negative, while direct drivers such as intensive land and sea use, pollution, and unsustainable extraction persist. Achieving Europe's biodiversity ambitions requires a stronger implementation of existing environmental legislation, a more effective integration of biodiversity into all relevant sectoral policies, and approaches that address the underlying causes of biodiversity loss and nature degradation: the disconnection from and domination over people and nature, the concentration of power and wealth, and the prioritisation of short-term, individual, economic gains (IPBES, 2024).


A policy and legal analysis of the integration of biodiversity targets in five major EU policies, complemented by an assessment of their transformative potential guided by the theoretical framework of the 2024 IPBES Assessment, provided a number of valuable insights on the barriers and levers for transformative policymaking. The study was conducted in the context of the DAISY project (2025–2027), funded by the EU's Horizon research and innovation programme. DAISY seeks to advance understanding of how specific combinations of interventions — including social and technological approaches — can drive transformations for biodiversity and equity.

As policymakers meet at the sixth meeting of the Subsidiary Body on Implementation (SBI 6) of the Convention on Biological Diversity (CBD), in preparation for the 17th meeting of the CBD Conference of the Parties (COP 17) in Yerevan, Armenia, these insights can provide valuable lessons learnt towards the update of National Biodiversity Strategies and Action Plans (NBSAPs), a necessary precondition for the implementation of the goals and targets of the Kunming-Montreal Global Biodiversity Framework (GBF), towards living in harmony with nature.

# The Study:

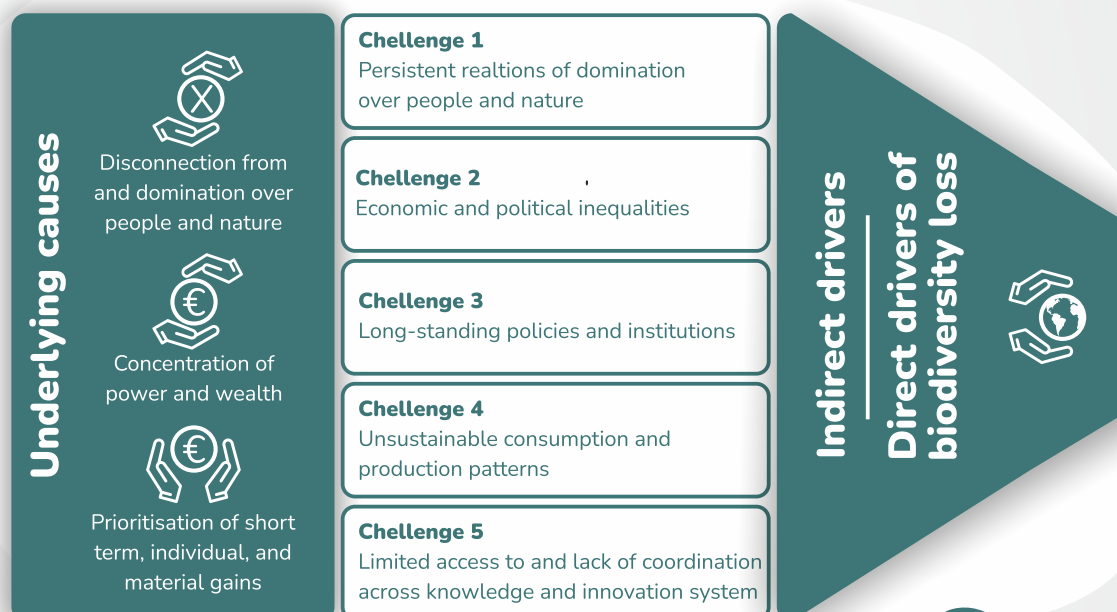
## main conclusions and key messages

According to the 2024 IPBES Assessment, transformative change is characterised by shifts across three interrelated dimensions: views (ways of seeing, thinking and knowing), structures (ways of organising, regulating and governing), and practices (ways of doing, behaving and relating) (IPBES, 2024). Five main challenges hinder transformative change across these three dimensions and thus need to be addressed:

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1. persistent relations of domination over people and nature;
  2. economic and political inequalities;
  3. misfit policies and institutions;
  4. unsustainable consumption and production patterns; and
  5. limited access to technologies and lack of coordination across knowledge and innovation systems for sustainability (Frantzeskaki et al., 2024).

Deliberate transformative change is guided by four principles: equity and justice; pluralism and inclusion; respectful and reciprocal human-nature relationships; and adaptive learning and action (Gurung et al., 2024).

**Figure 1:** Relationship between the five main challenges to transformative change, the underlying causes and the drivers of biodiversity loss, adapted from Frantzeskaki et al. (2024)



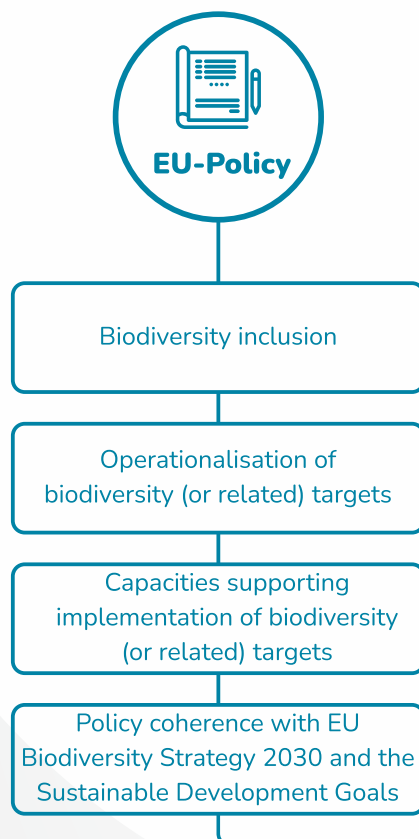
A detailed policy and legal analysis of five EU policy instruments identified their transformative elements and provided insights on both the challenges to transformative change and the enabling conditions to overcome them. Selected due to their relevance for biodiversity and equity, and in accordance with the DAISY research domains (*agri-food, education, energy, and urban and regional development*), the policies analysed are: the Birds Directive, the Habitats Directive, the European Climate Law, the Urban Agenda for the EU, and the Nature Restoration Regulation.

In addition to the IPBES theoretical framework for transformative change (IPBES, 2024), the study applied the Biodiversity Policy Integration (BPI) framework (Runhaar et al., 2024; Zinngrebe, 2018) to consider: how biodiversity or related sustainability issues are reflected in these policies; through which policy instruments or actions these targets are implemented; the capacities (e.g., mechanisms, knowledge, or resources) available to support implementation; and whether policy targets and instruments align with the objectives of the EU Biodiversity Strategy 2030 and the SDGs.

Analysing these EU policies using the BPI and the IPBES theoretical frameworks provided an overview of both their transformative elements and areas for improvement.

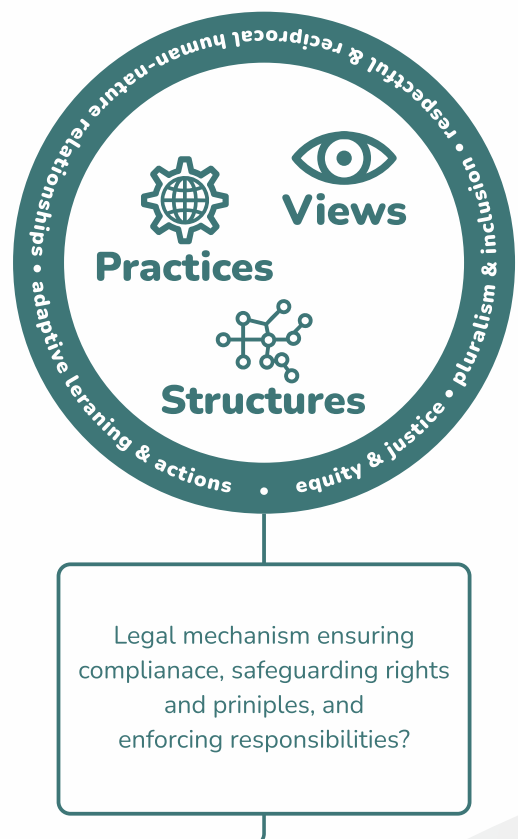
### Biodiversity Policy Integration

(Zinngrebe, 2019; Runhaar et al., 2024)



### Transformative Change

(IPBES, 2024)



**Figure 2:**  
Analytical  
Framework

# The study

Across the policies studied, several transformative elements are evident, meaning they can help shift practices and structures towards the protection of biodiversity. Their design often contains ambitious biodiversity or related targets, binding obligations, and several enabling conditions for their implementation, such as monitoring mechanisms and engagement formats. However, their effectiveness is often constrained by weaknesses in operationalisation, vague commitments, and limited enforcement. Furthermore, the engagement of these policies with the indirect drivers of biodiversity loss and their underlying causes is insufficient, resulting in a failure to address path dependencies defined by short-term economic interests and private profit over public good. Elements aimed at shifting underlying views remain particularly limited, missing an opportunity to transform how society relates to nature: toward more respectful and reciprocal relationships. Principles of justice, equity, pluralism, and inclusion, which could assist with moving away from prevailing patterns of disconnection and domination over both people and nature, are partly referenced across policies but in a rhetorical manner only, rarely translated into concrete mechanisms.

At the same time, implementation capacity remains uneven across EU Member States, and the coherence of sectoral policies — particularly agriculture, energy, spatial planning and trade — is insufficient to drive systemic change. To provide two illustrations, the Nature Restoration Regulation was a missed opportunity to align the EU restoration targets with existing sectoral frameworks to reprogramme existing EU funding, while the European Climate Law failed to adequately integrate biodiversity considerations into climate policy. These missed opportunities are coupled by shortcomings regarding the incorporation of diverse perspectives and knowledge systems into policymaking, which would also enable adaptive learning. Mechanisms for monitoring and revision are partially operationalised but face significant challenges, including missing indicators, uneven and fragmented data, and limited data accessibility.

# Recommendations


**Nature restoration, biodiversity conservation, and sustainable use of natural resources cannot succeed unless the objectives of environmental legislation and policy align with sectoral frameworks in the areas of agriculture, fisheries, forestry, energy and trade, as well as climate action.** Embedding biodiversity and restoration goals into sectoral frameworks and climate laws and policies (such as, in the case of the EU, the Common Agricultural Policy, the Common Fisheries Policy and the Climate Law), are required to move beyond rhetoric and into action.

While most of these policies are beyond the mandate of environment ministries, **various mechanisms, such as joint working groups, inter-ministerial committees, or inter-sectoral advisory bodies, may be used to promote inter-institutional complementarity and coordination.** These mechanisms can also constitute avenues for stakeholder participation in decision making, to promote pluralism and inclusion, as noted above.

That said, transformative biodiversity governance requires more than promoting implementation of, or strengthening coordination among, policy instruments; it requires a fundamental paradigm shift. **Achieving biodiversity-related goals and targets requires fundamentally changing the way we are approaching life.** The results of the study highlight the inadequacy of biodiversity policies to achieve this paradigm shift, by underscoring the failure to address relations of domination over both people and nature, and the resulting economic and political inequalities.



A key limitation across all examined policies is their limited engagement with the indirect drivers of biodiversity loss and the underlying causes, including concentration of power and wealth, expanding inequities, and prioritisation of shortterm material gains. **To that end, taking seriously the principles of equity and justice, as well as pluralism and inclusion, is critical.** Mentioning these principles in policy texts is not sufficient. Designing and applying concrete mechanisms for their implementation is a necessary step towards addressing the underlying causes of biodiversity loss.

# Recommendations



Public engagement often seems to be treated as a checkbox item: not only formats fail to consider all relevant groups, but they also lack transparency by failing to document and explain how the results are considered in policy outcomes. **Careful design and operationalisation of public participation standards, in accordance with human rights requirements, is key to address existing socio-economic and epistemic inequities and power asymmetries.** This requires ensuring that the design and facilitation of such formats remove barriers to meaningful participation, particularly of those groups that are less powerful, less vocal, or less wellresourced.

In this context, **engagement formats are required that facilitate interpersonal interaction that transcends the boundaries of interest groups, political affiliations, qualifications, and institutional mandates;** that enable joint learning processes and review mechanisms; and allow enough time for bringing together a diversity of perspectives towards a **collective reflection** on the underlying causes of ecosystem degradation and biodiversity loss.



Transforming the way society relates to nature is key and requires a change in framing and narratives. **Nature is largely seen as an object of management and reduced to a provider of services for human needs.** While the analysed policies rely on a view that separates people from nature, at the same time the concept of human responsibility is absent. **Measures to foster respect, care and emotional connection to nature are urgently needed.** Innovative collaborations beyond the environment sector, for example with education-related institutions and the arts, can be a means to transform how people relate to nature and to one another.



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