

Funding for Nature

How EU Funding Supports Biodiversity in Germany – and What Is at Stake in the Next MFF

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Executive Summary

- Through the EU budget, out of €2 trillion*, **€10.02 billion** was dedicated to funding biodiversity in Germany in the period from 2021 to 2027.
- In the same time period, approximately **€10.13 billion** was dedicated to funding biodiversity through the German national budget.
- Agricultural programmes play a pivotal role in biodiversity financing. Of the €20.15 billion in biodiversity funding from EU and German national sources combined, **67.84%** was channelled through the European Common Agricultural Policy (CAP) and the German Joint Task for the Improvement of Agricultural Structures and Coastal Protection (GAK) with over 40% alone going through the CAP.
- Under the current MFF 2021-2027, **€39.9 billion was needed for biodiversity** in Germany. With €20.15 billion planned for biodiversity during this time, **only around half of the biodiversity financing need is currently met.**
- Germany spends **almost 23 times more on environmentally harmful subsidies** than on biodiversity funding. Redirecting just over **4%** of environmentally harmful subsidies towards biodiversity **would be sufficient to close the financing gap.**
- EU biodiversity funding is under severe threat in the current negotiations for the **next EU budget from 2028 to 2034**, threatening to widen the already severe budget gap for biodiversity in Germany, and the EU as a whole. This will have consequences for nature conservation in Germany.

* In current prices. The NextGenerationEU package is included as part of the EU budget here as the European Commission also includes it in calculating biodiversity spending.



1 Setting the scene: Biodiversity funding



European and national biodiversity funding helps create species-rich agricultural landscapes that benefit farmland wildlife such as hares.

1.1 Why is investing in biodiversity so important?

Nature is facing severe threats through human activity and biodiversity loss is at an all-time high. Nature restoration is becoming more important every day as we depend on nature for clean air, drinking water, food production and protection against climate change. Investing in nature is also an economic necessity. According to the World Bank, more than half of global GDP is generated in sectors that depend on nature and its services.[1]

Investing in nature generates a significant return on investment. Nature is both part of the infrastructure that the global economy depends on and part of the defence against ever-worsening climate impacts. The EU estimates a return on investment ranging between 4 and 38 Euros per Euro spent.[2] While it might cost money now to restore nature, in the end national budgets will be better off for it.

In 2022, governments – including Germany – signed the international Kunming-Montreal Global Biodiversity Framework. Target 19 of the framework calls for mobilising $200 billion for biodiversity a year. Correspondingly, with target 18 signatories aim to reduce harmful subsidies by $500 billion a year. As part of the Convention, signatories are required to prepare Biodiversity Strategies and corresponding Biodiversity Finance Plans. The EU is also a party to the Convention and has its own Biodiversity Strategy.[3]

1.2 Financing gap

While countries have diligently created Biodiversity Strategies, plans on financing remain largely absent. Germany adopted a revised National Biodiversity Strategy (NBS 2030) in 2024.[4] Within the 2024-2027 action plan of the strategy, Germany commits to the following: "By 2026, the foundations will be laid for incremental increases in the total funding volume for biodiversity-promoting projects." (p. 53).[5] But a concrete estimate of financing needs and a financing strategy remain missing.



Protecting and restoring biodiversity requires substantial investment alongside efforts to reduce environmentally harmful practices.

Currently, there is a significant finance gap, with the EU planning in its Biodiversity Strategy to unlock at least €20 billion a year to meet its biodiversity goals over the next decade.[6] A report commissioned by the European Commission estimates that achieving the Strategy's targets will cost more than twice this amount, with €48.2 billion per year between 2021 and 2030.[7] The same report estimates that during this timeframe €29.5 billion will be spent per year by the EU, Member States and private sources. This leaves a gap of roughly €18.7 billion per year. Notably, the authors assume that biodiversity spending will steadily increase from 2021 to 2030. Meanwhile, it is already clear that the commitment appropriations they use under the MFF 2021-2027 will not be met. Hence, the financing gap is likely to be even bigger.

The European Commission estimates that **Germany needs to invest €80.2 billion a year to meet its environmental objectives, with €5.7 billion specifically needed for biodiversity and ecosystems.**[8] At the same time, it remains difficult to establish how much Germany currently spends on biodiversity. Data from the German Federal Statistical Office (Destatis) provide an overview of biodiversity-related expenditure but are available only in aggregated form and do not include EU expenditure.[9] This makes it difficult to assess both the overall level of biodiversity financing and the contribution of individual funding sources.

This question has gained additional importance with the implementation of the EU Nature Restoration Law, adopted in 2024. The law requires Member States to develop national restoration plans and significantly scale up measures to restore degraded ecosystems. Germany is currently developing its national plan, but the federal government has so far not provided a final estimate of the financial resources required for its implementation. An expert assessment by LANA, however, estimates based on Germany's priority action framework that implementing Article 4 of the Nature Restoration Law alone could cost approximately €1.74 billion per year until 2030.[10]

As the EU negotiates the 2028-2034 MFF, understanding the contribution of EU funding to biodiversity financing in Germany is increasingly important. If current funding already falls short of biodiversity needs, changes to the EU budget could further undermine Germany's ability to meet its biodiversity and restoration commitments.

Against this background, this report examines the role of EU funding in financing biodiversity in Germany. It first estimates the amount of biodiversity-related funding available to Germany under the 2021-2027 EU budget and identifies the main EU funding programmes contributing to this expenditure. It then compares this with selected national biodiversity funding programmes in order to assess the overall scale of public biodiversity financing captured by the analysis. Finally, the report examines the proposed 2028-2034 MFF and considers what its design could mean for future biodiversity financing in Germany.

1.3 Private funding as the solution?

A quick note on private funding for biodiversity is crucial. With national budgets under pressure, increasingly private funding is named as a solution to this financing gap. This includes instruments such as nature credits, which remain at an early stage of development. But according to the 2026 State of Finance for Nature Report by the United Nations Environment Programme, private funding only amounts to 11% of the total funding for nature.[11] This is not negligible and private funding might grow in importance as companies increasingly understand the importance of ecosystem services, but public funding remains the most important lever for biodiversity funding. This report therefore focuses on public finance, where the largest policy levers currently lie.



Grey partridges are among the farmland bird species threatened by intensive agricultural practices. Measures such as flower strips and fallow land, supported through agricultural funding programmes, help improve their habitat.

2 Current biodiversity funding

2.1 Funding in the EU

The EU works with a budget for seven-year periods. The so-called Multiannual Financial Framework (MFF) is currently being negotiated for the period from 2028 to 2034. The current MFF 2021-2027 includes a spending target for the climate and environment of 30% and a parallel non-binding spending target for biodiversity which rises over the years and is supposed to reach 10% in 2026 and 2027. The current MFF also includes a tracking methodology for biodiversity.[12] According to this methodology, the EU will spend a total of €113 billion on biodiversity in this seven-year period which amounts to a total of 5.8% of the entire budget (Figure 1).[13] The Common Agricultural Policy (CAP) is the policy with the biggest contribution to biodiversity spending, with the CAP providing 57% of the support from the whole MFF.

Biodiversity contribution in the 2021–2027 period (million EUR)

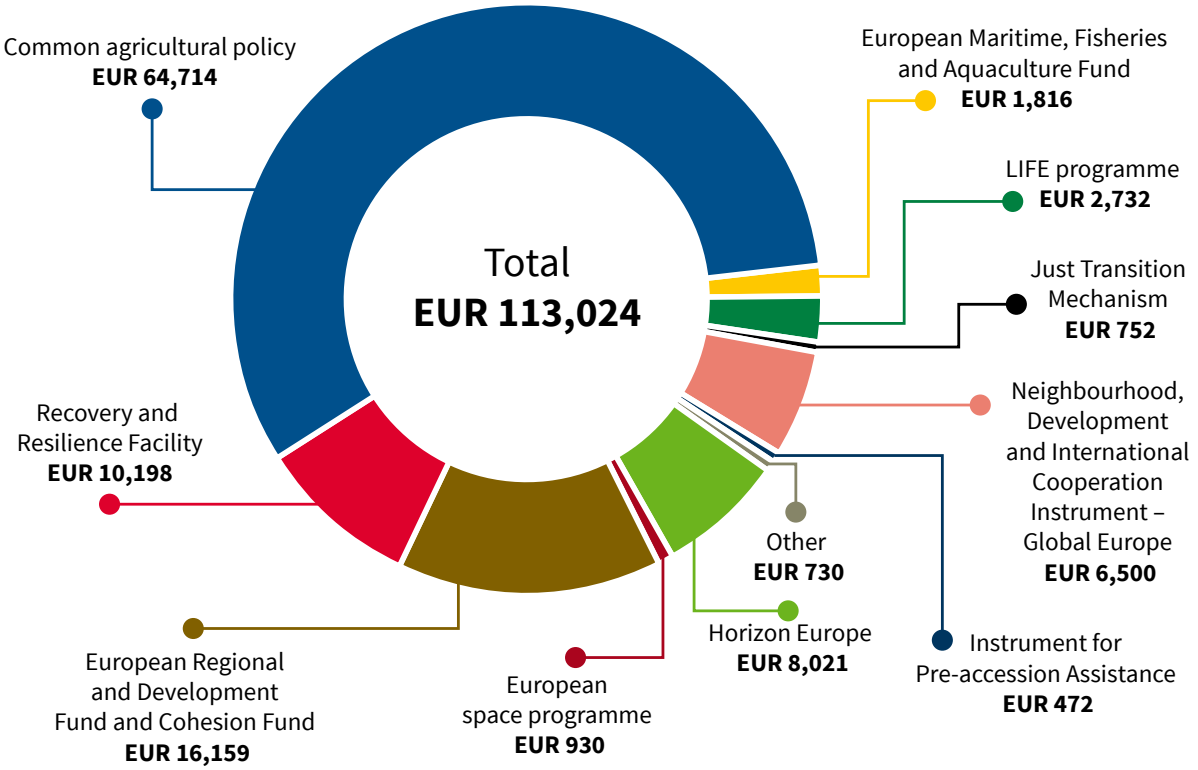


Figure 1: Contribution of the current MFF to biodiversity by programme.[14]

The EU achieved its biodiversity spending target of 7.5% in 2024 but according to the European Commission, the EU and its Member States will not reach the 10% target in 2026 and 2027 (Figure 2). Importantly, the amount dedicated to biodiversity does not necessarily reflect actual positive impact. Firstly, EU-funded measures differ in quality and impact. Secondly, the European Commission's tracking methodology has flaws, the most obvious one being the methodology for tracking the spending from the Recovery and Resilience Facility which does not differentiate between climate and biodiversity. The amount of over €10 billion (9% of the overall biodiversity spending) presented by the Commission is therefore very likely overestimated.

Expected biodiversity contribution in the 2021-2027 period (million EUR)

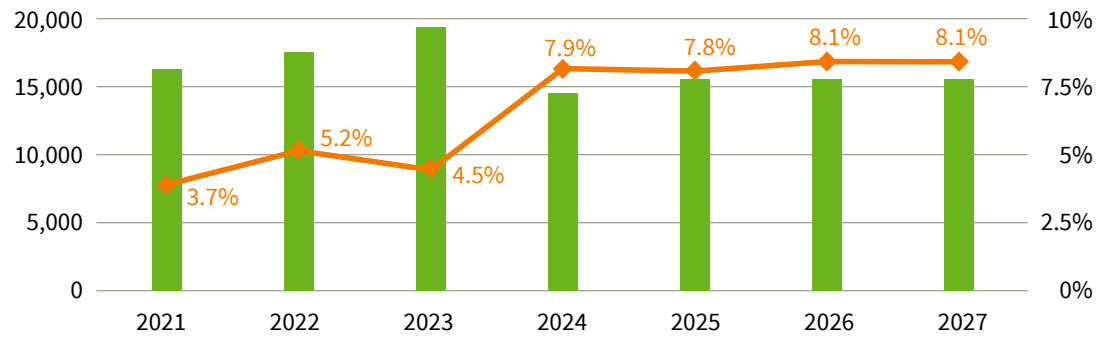


Figure 2: Planned biodiversity expenditure and biodiversity contribution share (budgetary commitments) under the MFF 2021-2027 (million EUR).[15]

2.2 Funding in Germany

2.2.1 Biodiversity funding through the EU budget

While the biodiversity tracking methodology has been applied at EU-level, no equivalent biodiversity funding analysis is currently available for Member States. Using the Commission's methodology and publicly available programme data, we therefore reconstructed Germany's biodiversity-related funding under the 2021-2027 MFF.

The analysis indicates that approximately **€10.02 billion is allocated to biodiversity in Germany through the current MFF.** As Figure 3 shows, the Common Agricultural Policy makes up by far the largest part of this with €8.75 billion – meaning that **the CAP accounts for 87% of biodiversity funding in Germany.** Notably, the CAP was delayed and only came into effect in 2023. It is remarkable that even though for two of the seven years, no CAP payments were included in the analysis, the CAP contribution is still this high.

MFF 2021-2027: Contribution to biodiversity in Germany

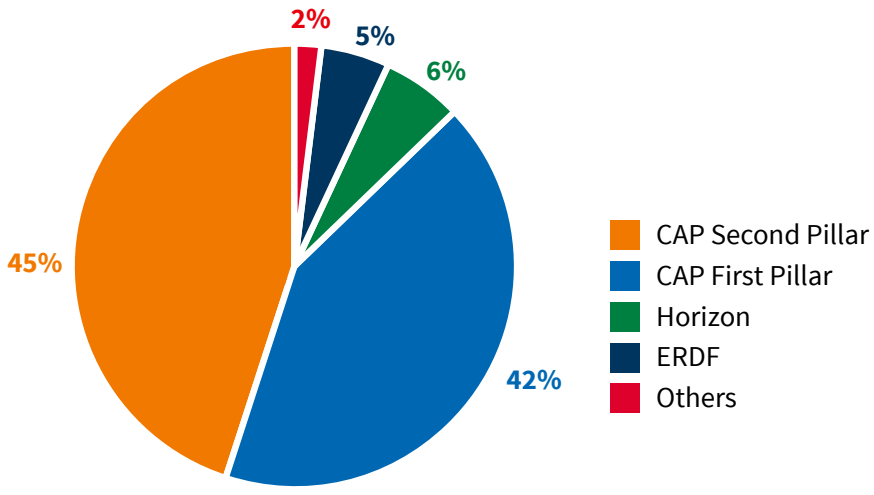


Figure 3: Planned expenditure for biodiversity in Germany by EU programme.

The difference in shares the programmes contribute to biodiversity in Germany compared to the total EU-contributions (Figure 4) is explained by certain programmes like Cohesion being mostly disbursed outside of Germany or in the case of Global Europe outside the EU. Furthermore, as explained above, biodiversity tracking for the Recovery and Resilience Facility is flawed and an analysis of the German plan showed that the fund does not contribute to biodiversity.[16]

	MFF 2021-2027 Biodiversity Spending Germany		MFF 2021-2027 Biodiversity Spending EU	
Funds	**EUR**	**Percentage**	**EUR**	**Percentage**
European Regional Development Fund	489,289,977.00 €	4.88%	16,159,100,000.00 €	14.30%
Just Transition Fund	22,026,693.60 €	0.22%	752,000,000.00 €	0.67%
European Maritime Fisheries and Aquaculture Fund	60,019,751.00 €	0.60%	1,815,900,000.00 €	1.61%
Recovery and Resilience Facility	---	---	10,198,000,000.00 €	9.02%
CAP First Pillar	4,258,650,790.36 €	42.48%	---	---
CAP Second Pillar	4,496,243,486.78 €	44.85%	---	---
CAP total	---	---	64,714,400,000.00 €	57.26%
LIFE	76,606,770.60 €	0.76%	2,732,000,000.00 €	2.42%
Horizon	621,618,009.92 €	6.20%	8,020,900,000.00 €	7.10%
Other	---	---	8,632,000,000.00 €	7.64%
Total	**10,024,455,479.25 €**	**100.00%**	**113,024,300,000.00 €**	**100.00%**

Figure 4: Comparison of EU biodiversity spending under the 2021-2027 MFF at EU and German levels.

Included in the analysis are the following programmes: the Common Agricultural Policy[17], the European Fund for Regional Development[18], European Maritime, Fisheries and Aquaculture Fund[19], Just Transition Fund[20], Horizon[21] and LIFE[22].

It should be noted that the data used shows planned expenditure and not actual spending. Further below, several programmes are analysed more in depth to show how uptake can differ from planned spending. Another important caveat is that parts of the MFF are co-financed by Member States, in Germany either at federal or at state level. The money spent because of the MFF from Germany's national budget was excluded from the analysis to avoid double counting with the analysis of German biodiversity spending further below.

Let's put this number – €10 billion on biodiversity – into perspective: **In the MFF 2021-2027, €30 billion are in the CAP-envelope for Germany. Of this, 29% or €8.75 billion is directed towards biodiversity. With €16.09 billion spent on direct payments in Germany*, more money goes straight to income support for farmers than to biodiversity.**

Detailed information on funding of different interventions is listed in Annex I. As the CAP contributes most to EU-biodiversity funding, we provide a more detailed overview here.

* Basic Income Support for Sustainability, Supplemental Redistributive Income Support for Sustainability, Supplemental Income Support for Young Farmers

Biodiversity funding through the CAP

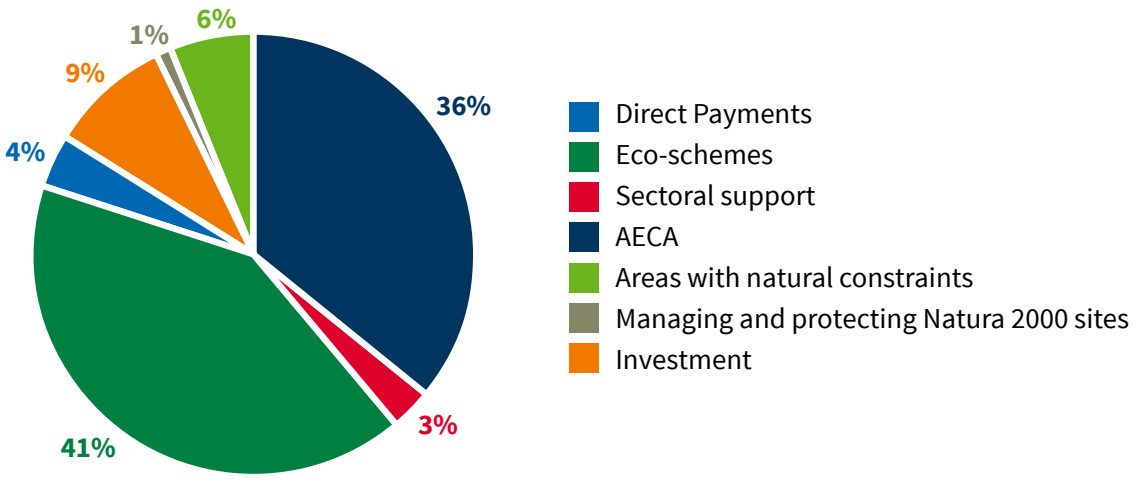


Figure 5: Distribution of biodiversity funding within the CAP by programme.

As becomes clear in Figure 5, Eco-schemes in Pillar 1 and agri-environmental and climate actions (AECA) in Pillar 2 account for 77% of biodiversity spending within the CAP. Within the entire CAP, 60% of Pillar 2 and 19% of Pillar 1 go towards biodiversity.

Eco-schemes were initially undersubscribed in 2023 but uptake improved rapidly, likely due to programme adjustments and greater familiarity among farmers. Disbursements increased from 75% of the planned budget in 2023 to 100% in 2024 and 106% in 2025[23], indicating that funding earmarked for biodiversity is largely reaching beneficiaries.

2.2.2 Biodiversity funding through the national budget

To put these numbers into perspective and complete the picture, a look at the biodiversity funding from the national budget is useful. Destatis provides some aggregate numbers on this.[24] However, this is not clearly delineated from EU funding and does not include information on the precise allocation. Therefore, we conducted our own analysis by focussing on the large federal funds for biodiversity, namely the Action Programme Natural Climate Protection (ANK), the Joint Task for the Improvement of Agricultural Structures and Coastal Protection (GAK) and the Federal Nature Conservation Fund (Bundesnaturschutzfonds).

This analysis is more of an approximation than the analysis of MFF funding. This is due to only including these three large programmes. Moreover, this analysis does not use coefficients to calculate contribution to biodiversity and does not go in depth into the three funds. Especially for the GAK, biodiversity funding is therefore overestimated (more on this below).

It should be noted that the focus is on federal funding and state funding on biodiversity was only considered for the GAK. According to Destatis, federal funding is only slightly higher than total state funding. When municipal funding is included, federal funding is outweighed by a factor of 1.5.[25] Additionally, the

implementation of nature-conservation measures is the responsibility of the federal states*. Therefore, further analysis of state and municipal biodiversity funding remains highly interesting but out of the scope of this work.

When looking at the **Federal Nature Conservation Fund** from 2021 to 2027, a total of €711.29 million is available.[26] The **Action Programme Natural Climate Protection (ANK)** has been provided with €4.5 billion for the period from 2023 to 2029.[27] For the purposes of this analysis, expenditure under both programmes is fully counted towards biodiversity funding. The ANK covers a different time frame than the current MFF but as it also is planned for a period of seven years, the total amount is still used for the analysis.



Once widespread across Germany, the European hamster depends on biodiversity-friendly agricultural management to survive.

A large part of biodiversity funding stems from the **Joint Task for the Improvement of Agricultural Structures and Coastal Protection (GAK)** that focuses on improving and equalizing the conditions in the agricultural sector. The GAK provides funding to federal states which co-finance the measures they implement. It consists of several funding areas, of which a few contribute to biodiversity. To assess how much is dedicated to biodiversity through the GAK, the purpose of the measures was searched for mention of sustainability and climate.[28] As funding is often reported at higher level, the results include measures that do not contribute to biodiversity such as investments in barns, forest roads etc. Therefore, a more conservative estimate was also made which only includes measures more clearly linked to biodiversity. A more detailed description of the methodology can be found in Annex II.**

No estimate of 2027 funding is available at programme level but from 2021 to 2026, €4.92 billion was allocated to biodiversity through the GAK. As the 2022 planning is only available at programme level, the contribution

* The national government cannot simply take over responsibility for nature-conservation through the allocation of funding without proper justification. The ANK for instance is officially a climate funding instrument, but due to its focus on the LULUCF sector and nature-based solutions has strong biodiversity benefits. Similarly, the GAK's focus is to level the playing field of the agricultural sector. On the other hand, the Federal Nature Conservation Fund's main focus is biodiversity, however with a strong emphasis on pilot and lighthouse projects with national relevance.

** Importantly, since 2024 the GAK has been supplied with funding from the ANK. To avoid double-counting, funding through the ANK was not included in the analysis. Additionally, parts of the GAK's funds are spent on CAP measures that require co-financing from Member States. However, double counting was avoided by excluding all EU funding.

of this year is much higher and distorts the results upwards even more than is already the case. The more conservative estimate puts planned spending on biodiversity at €3.24 billion. Actual spending from 2021 to 2025 is at €3.33 billion. The more conservative estimate puts actual spending on biodiversity at €2.28 billion.

Added up, Germany has provided €10.13 billion (or €8.45 billion using the conservative estimate) of funding for biodiversity from its national budget in the current MFF period. As explained, this number is much more of an estimate than the number of EU MFF planned expenditure on biodiversity in Germany. However, these results still highlight that the MFF is a crucial source for biodiversity funding in Germany. Within the funding streams covered by this analysis, **EU funding accounts for 49.74% of the biodiversity funding captured by this analysis during the 2021-2027 period.** It also highlights that currently a crucial part of the funding for biodiversity stems from agricultural programmes, both on EU and national level. **As Figure 6 shows, the agricultural programmes CAP and GAK make up a total of 67.84% of biodiversity funding in Germany. The CAP alone contributes over 40%.**

Biodiversity funding in Germany 2021-2027

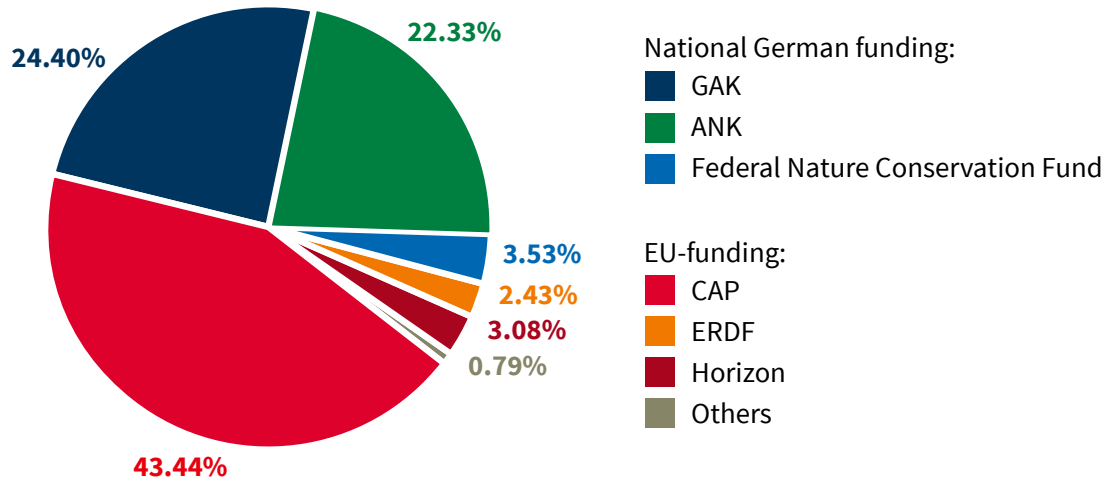


Figure 6: Total biodiversity funding 2021-2027 – combining both EU-funding and national German funding – by programme.

Using the Commission's €5.7 billion annual estimate as a benchmark, Germany would have required approximately €39.9 billion over the seven-year period. The funding captured in our analysis amounts to approximately €20.15 billion, suggesting that **only around half of the biodiversity financing need is currently met.***

* While this analysis excludes most federal funding, with the exception of the GAK, it is highly unlikely that the remaining federal resources would be sufficient to close a gap of this magnitude, which is roughly equal to the combined contribution of EU and German national biodiversity funding. Importantly, the estimate of German national funding is already likely to overstate actual biodiversity expenditure, as no biodiversity coefficients were applied, in contrast to the methodology used for EU funding.

3 Harmful subsidies



Public support for fossil fuel infrastructure and production contributes to environmental degradation and undermines biodiversity objectives.

The Paulson Institute, the Nature Conservancy and the World Wildlife Fund estimate in a report on nature financing that 30 times more finance flows into harming nature than is invested in nature. In this report they put it well: "More capital than ever is going towards nature protection. Yet, at the same time, the biodiversity funding gap has widened, simply because the financial flows that destroy nature are growing faster than the ones that protect it." (p. 12).[29]

As a party to the Convention on Biological Diversity, the European Union publishes an analysis of environmentally harmful energy subsidies each year. The most recent data covers spending up until and including 2024. In a report from September 2026, the European Commission estimates the amount of environmentally harmful energy subsidies in 2024 at €110 billion (a decrease of 26% to the previous year).[30]

As a reminder, under the current MFF, the European Commission estimates that €113 billion will be spent on biodiversity. Roughly the same amount is spent on harmful subsidies in the EU each year, as is spent on biodiversity over a seven-year period.

The European Commission also has the goal of estimating non-energy subsidies harmful to the environment. However, the work on this seems to have stalled with the last and only guidance document published in 2024.[31] The guidance document remains vague on how to estimate these non-energy harmful subsidies and does not provide an estimate of how much the EU spends on non-energy harmful subsidies.

Only the NGO WWF has looked specifically at biodiversity harmful subsidies in the EU. Their 2024 report estimates that between €34.43 billion and €48.87 billion were spent on harming biodiversity through the current MFF 2021-2027.[32]

The amount of research on harmful subsidies is even more sparse for Germany than it is at EU-level. As it is a requirement under the Convention on Biological Diversity, Germany has pledged in its Biodiversity Strategy to

check its harmful subsidies until 2027. In general, the lack of research on this topic, particularly by the German government itself, represents a big gap in implementing the Convention on Biological Diversity.

The latest official report by the German Environment Agency (UBA) from 2021 estimates that **in 2018, Germany spent at least €65.4 billion on environmentally harmful subsidies.**[33] The report does not look specifically at harmful subsidies for biodiversity but climate as a whole. Notably, no CAP payments were included in the calculation.

Using the definitions of the German Environment Agency's report, the Bertelsmann Stiftung conducted another analysis of harmful subsidies in Germany for the year 2024.[34] They estimated that **in 2024 €66.2 billion were spent on harmful subsidies.** While this is a slight increase to the UBA's value for 2018, it actually represents a slight decrease of environmentally harmful subsidies when taking into account inflation.

Again, this is not an analysis of biodiversity-harmful subsidies specifically, but of environmentally harmful subsidies more broadly. Still, this shows that **in Germany almost 23 times the money is spent on environmentally harmful subsidies compared to funding biodiversity (Figure 7). Reinvesting around 4% of these harmful subsidies into biodiversity would already fill the financing gap.**

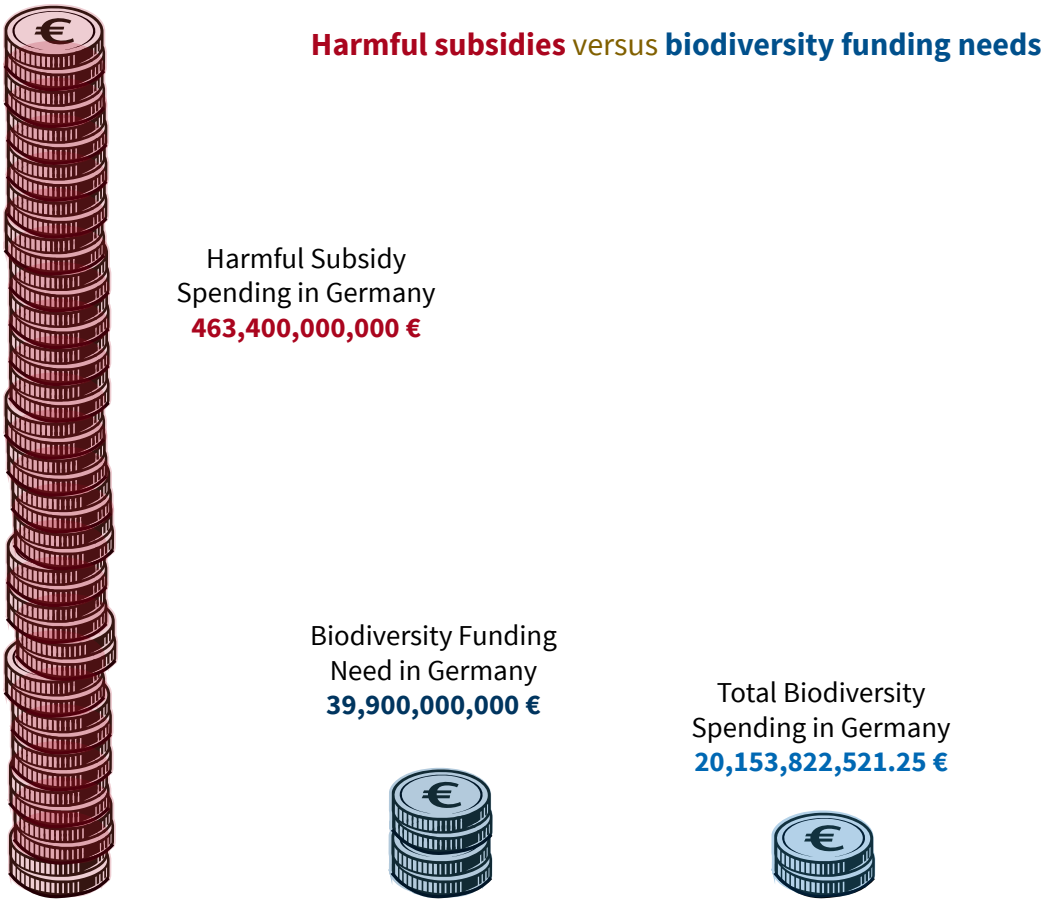


Figure 7: Comparison of harmful subsidy spending in Germany and both biodiversity funding and the biodiversity need in Germany. For Harmful Subsidy Spending in Germany, the €66.2 billion estimated by the Bertelsmann Stiftung was multiplied by seven to make it comparable to the timeframe used to estimate Total Biodiversity Funding and Biodiversity Funding Need.

4 The next MFF

While much remains undecided on the next MFF, it is highly likely that the already insufficient biodiversity funding will decrease significantly and thereby increase the financing gap. In July 2025, the European Commission (EC) presented its proposal for the MFF 2028-2034. To simplify the MFF and create more flexibility for Member States, the EC removed many individual programmes such as LIFE and combined the activities of these programmes in bigger funds. For example, the Common Agricultural Policy (CAP) is now part of the so-called National and Regional Partnership Plans (NRPP). The EC proposal still retains a ring-fenced budget but only for direct income support and its design is part of the country-specific NRPPs.

Now the Council and the European Parliament are separately agreeing on their positions before they enter interinstitutional negotiations – so-called trilogues – likely at the start of 2027.

4.1 No biodiversity target

The Commission proposed an overarching expenditure target of 35% of the MFF for climate and environmental spending, while excluding defence and security spending (€131 billion) from this target. This is divided into sub-targets for different funds with the NRPPs having to contribute 43% to the climate and environment target according to the EC's proposal. This is seemingly an upgrade to the current 30% spending target. However, the dedicated biodiversity target of 10% of the current MFF has been removed. Furthermore, the EC has proposed a tracking methodology (Annex I, Performance Regulation) for the 35% target that is highly questionable, with NGOs like BirdLife Europe & Central Asia, WWF and T&E warning of greenwashing.[35]



Species-rich field margins support pollinators, birds and other wildlife while contributing to more resilient agricultural ecosystems.

One example of greenwashing is the fact that CAP basic income support is given a coefficient of 40%, meaning that 40% of direct payments can be attributed to contributing to the climate and environment target. The German Environment Agency estimates that with a medium budget size (somewhere between the EP's high demand and the Council's demands for cuts), direct payments alone make up 10% of the 35% target.[36]

Currently, the Commission also applies a 40% marker to direct payments (excluding eco-schemes). However, two important caveats have to be made: Firstly, the Commission's proposal dismantles key environmental safeguards attached to direct payments. In place of binding EU-wide minimum standards, it grants member states far greater discretion, creating a real risk of a race to the bottom in environmental ambition. Secondly, according to a study by the Thünen Institute on behalf of the Commission, this 40% marker is too high.[37] According to this report, only 21% of direct payments (excluding eco-schemes) contribute to the MFF's climate target.

4.2 No dedicated funding for nature

The Commission has proposed dedicated funding for defence, migration, income support for farmers and several other policy areas. But unlike the current MFF, the proposal contains no dedicated funding for nature conservation. Especially in the context of the ambitious Nature Restoration Law this is puzzling. The NRPP proposal simply asks Member States to take their Nature Restoration Plans "into account" when drafting their national plans (Article 22).[38]

Safeguarding policy areas such as nature restoration through dedicated funding is crucial, as it simply is low on the list of priorities for states at the moment. This is highlighted once more by the EU and its Member States missing their own biodiversity target under the current MFF 2021-2027. Targets are important but dedicated funding is much more effective in ensuring money is spent where promised.



Extensive grazing systems can improve both animal welfare and biodiversity by maintaining diverse and structurally rich landscapes.

4.3 CAP architecture risks reducing biodiversity funding

The CAP will likely shrink. While the European Parliament calls for €426.7 billion for CAP interventions, the Commission proposes only €293.7 billion in ring-fenced funding for income support. The key problem is the weakening of environmental safeguards and the absence of ring-fenced funding for AECAs. In a CAP with lower conditionality and no dedicated budget for environmental measures, biodiversity spending will have to compete with direct income support. Consequently, **any reduction in the overall CAP budget is likely to disproportionately affect funding for biodiversity and agri-environment-climate measures.** This runs counter to the recommendations of the Commission on the Future of Agriculture in Germany, which concluded that CAP funding should increasingly support agri-environment-climate measures.[39] Germany's National Biodiversity Strategy reflects this objective, stating that direct payments should gradually be replaced by remuneration for farmers' environmental and climate services.[40]

Based on its proposal for the National and Regional Partnership Plans (NRPPs), the Commission has tentatively allocated €33.11 billion in CAP funding for Germany between 2028 and 2034, or €4.73 billion annually.[41] Although this would still account for almost half of Germany's proposed NRPP allocation (€68.4 billion)[42], it represents a reduction of around €1.3 billion per year compared with the current CAP period. As several Member States, including Germany, are calling for further reductions to the overall EU budget, the final amount could be even lower.

Taking the Commission's proposal and applying the 29% planned for biodiversity under the current budget, a total of €9.61 billion would be spent on biodiversity. At first glance this seems like an increase, but the current CAP was only in effect for five and not seven years. So even under the unlikely assumption that the current level of 29% is continued, **the Commission's proposal would lead to a decrease of 21.62% for biodiversity funding under the CAP. To retain the same level of biodiversity funding – not considering inflation – 37% of the CAP budget would need to be allocated to biodiversity.**



The Common Agricultural Policy remains one of the most important funding sources for biodiversity-friendly farming practices in Germany.

At the same time, the proposed CAP architecture weakens safeguards for environmental spending. Eco-schemes would be abolished, while AECAs would remain but without ring-fenced funding. Although the European Parliament is considering such a safeguard, several Member States in the Council are instead seeking greater flexibility to determine both the size and design of AECA budgets. The NRPP climate and environment target of 43% is not an adequate substitute. If direct payments continue to account for 54% of the CAP envelope and are assumed to contribute 40% towards the spending target, they alone would account for **21.6% of the climate and environment target.**

The Commission also proposes increasing AECA co-financing rates from 20% to 30%. Under the current CAP, eco-schemes are financed entirely by the EU and Member States can transfer funds from Pillar I to Pillar II to support AECAs without triggering additional co-financing requirements. Germany has made use of this possibility. According to an analysis by IEEP, Agora Agrar and the Clingendael Institute, maintaining current levels of AECA and eco-scheme support under the new rules would require Germany to increase its national contribution by **159%, equivalent to €2.994 billion.**[43]

Given the combination of a smaller CAP budget, the absence of ring-fencing for AECAs, higher co-financing requirements and greater national flexibility, biodiversity funding is likely to decline across Member States.

5 Conclusion

Germany faces a substantial biodiversity financing gap. Based on the European Commission's estimate that €5.7 billion per year is needed to meet biodiversity and ecosystem objectives, approximately €39.9 billion would have been required between 2021 and 2027. The €20.15 billion in biodiversity funding captured by this analysis therefore suggests that only around half of current financing needs are being met.

The analysis also highlights the importance of EU funding for biodiversity in Germany. Approximately €10 billion of biodiversity-related funding originates from the current EU budget, with the Common Agricultural Policy providing the largest share. This makes the design of the next EU budget highly consequential for Germany's ability to finance nature conservation and restoration.

At the same time, the Commission's proposal for the 2028-2034 MFF risks further widening the financing gap. **The removal of the biodiversity spending target, the absence of dedicated funding for nature restoration and proposed changes to the CAP could reduce support for biodiversity at a time when investment needs are growing.**

The challenge is not only one of insufficient funding, but also of spending priorities. Germany continues to spend far more on environmentally harmful subsidies than on biodiversity. Redirecting even a small share of these subsidies could make a significant contribution to closing the financing gap.

To meet Germany's biodiversity and restoration commitments, **the next EU budget should maintain dedicated support for nature, safeguard agri-environmental measures and ensure that biodiversity spending is tracked against real environmental outcomes.** Without such safeguards, the biodiversity financing gap is likely to grow rather than shrink.



Annex I

Fund	Interventions	Biodiversity Contribution	Coefficient	Final Contribution
European Regional Development Fund	058: Climate adaptation/risk management: floods	431,896,282.00 €	40.00%	172,758,512.80 €
	060: Adaptation to climate change measures and prevention and management of climate related risks: others, e.g. storms and drought	172,346,463.00 €	40.00%	68,938,585.20 €
	073: Rehabilitation of industrial sites and contaminated land	88,964,000.00 €	40.00%	35,585,600.00 €
	074: Rehabilitation of industrial sites and contaminated land compliant with efficiency criteria	6,696,000.00 €	40.00%	2,678,400.00 €
	078: protection, restoration etc of Natura 2000 sites	20,075,000.00 €	100.00%	20,075,000.00 €
	079: Nature and biodiversity protection, green infrastructure	124,453,879.00 €	100.00%	124,453,879.00 €
	080 - Other measures to reduce greenhouse gas emissions in the area of preservation and restoration of natural areas with high potential for carbon absorption and storage	64,800,000.00 €	100.00%	64,800,000.00 €
				489,289,977.00 €
Just Transition Fund	073: Rehabilitation of industrial sites and contaminated land	55,066,734.00 €	40.00%	22,026,693.60 €
				22,026,693.60 €
European Maritime Fisheries and Aquaculture Fund	1. Reducing negative impacts and/or contributing to positive impacts on the environment and contributing to Good Environmental Status	31,130,021.00 €	100.00%	31,130,021.00 €
	3. Contributing to climate neutrality	3,068,392.00 €	40.00%	1,227,356.80 €
	4. Temporary cessation of fishing activities	11,546,336.00 €	40.00%	4,618,534.40 €
	6. Contributing to Good Environmental Status through implementing and monitoring Marine Protected Areas including Natura 2000	3,550,000.00 €	100.00%	3,550,000.00 €
	10. Control and enforcement	13,743,879.00 €	40.00%	5,497,551.60 €
	11. Data collection, analysis, and promotion of marine knowledge	34,990,718.00 €	40.00%	13,996,287.20 €
				60,019,751.00 €
LIFE	LIFE Nature 2021-2027	70,455,385.00 €	100.00%	70,455,385.00 €
	mention of biodiversity, habitat, species, restoration	15,378,464.00 €	40.00%	6,151,385.60 €
				76,606,770.60 €
Horizon Europe		237,187,892.20 €	100.00%	237,187,892.20 €
		961,075,294.30 €	40.00%	384,430,117.72 €
				621,618,009.92 €
Non-agricultural biodiversity spending				**1,269,561,202.12 €**

The Common Agricultural Policy (CAP)[44]

Fund	Interventions	Biodiversity Contribution	Coefficient	Weighting Factor	Final Contribution
First Pillar (European Agricultural Guarantee Fund, EAGF)	Basic Income Support for Sustainability 2023	2,639,631,972.64 €	40.00%	10.00%	105,585,278.91 €
	Basic Income Support for Sustainability	10,140,563,681.30 €	20.00%	10.00%	202,811,273.63 €
	Supplemental Redistributive Income Support for Sustainability 2023	530,895,109.57 €	40.00%	10.00%	21,235,804.38 €
	Supplemental Redistributive Income Support for Sustainability	2,043,741,947.63 €	20.00%	10.00%	40,874,838.95 €
	Supplemental Income Support for Young Farmers 2023	147,467,188.92 €	40.00%	10.00%	5,898,687.56 €
	Supplemental Income Support for Young Farmers	589,868,755.68 €	20.00%	10.00%	11,797,375.11 €
	Direct Payments				**388,203,258.54 €**
	Eco-scheme: Provision of land to improve biodiversity and conserve habitats	1,529,211,450.00 €	100.00%	**70.00%**	1,070,448,015.00 €
	Eco-scheme: Cultivation of a diverse range of crops, including at least five major crop types in arable farming, with legumes accounting for at least 10 percent	757,805,054.93 €	40.00%	100.00%	303,122,021.97 €
	Eco-scheme: Maintaining agroforestry practices on arable land and permanent pasture	9,499,600.00 €	100.00%	**70.00%**	6,649,720.00 €
	Eco-scheme: Extensification of the farm's entire permanent grassland	939,588,515.00 €	100.00%	70.00%	657,711,960.50 €
	Eco-scheme: Results-oriented, extensive management of permanent grassland areas with evidence of at least four regional indicator species	986,491,065.00 €	100.00%	100.00%	986,491,065.00 €
	Eco-scheme: Farming the farm's arable or permanent crop land without the use of synthetic chemical pesticides	450,008,100.00 €	100.00%	70.00%	315,005,670.00 €
	Eco-scheme: Application of land management methods determined by conservation objectives on agricultural land within Natura 2000 sites	262,402,400.00 €	100.00%	100.00%	262,402,400.00 €
	Eco-schemes				**3,601,830,852.47 €**
	DZ-0501: Coupled Income Support for the Beef and Veal Sector	214,562,741.06 €	100.00%	50.00%	107,281,370.53 €
	DZ-0502: Coupled Income Support for the Sheep and Goat Meat Sector	214,540,619.01 €	100.00%	50.00%	107,270,309.51 €
	INVRE Investments in tangible and intangible assets, research and experimental farming, innovative production methods, and other measures	Hops: 11 million in total; no separate information on the amount of this intervention	100.00%	70.00%	
	ORGAN organic farming or integrated farming	Hops: 11 million in total; no separate information on the amount of this intervention	100.00%	70.00%	

Fund	Interventions	Biodiversity Contribution	Coefficient	Weighting Factor	Final Contribution
	ADVIBEES Advisory services, technical assistance, training, information campaigns, and the exchange of best practices - including through networking activities – for beekeepers and beekeeping organizations	2,926,152.21 €	100.00%	100.00%	2,926,152.21 €
	INVAPI Investments in tangible and intangible assets, as well as other measures	3,651,216.84 €	100.00%	100.00%	3,651,216.84 €
	ACTLAB Measures to support analytical laboratories that test beekeeping products, bee mortality, or declines in productivity, as well as substances that are potentially toxic to bees	817,057.58 €	100.00%	100.00%	817,057.58 €
	PRESBEEHIVES Measures to maintain or increase the number of beehives in the Union, including beekeeping	960,441.56 €	100.00%	100.00%	960,441.56 €
	COOPAPI Collaboration with organizations that specialize in conducting applied research programs in the field of beekeeping and beekeeping products	3,040,660.41 €	100.00%	100.00%	3,040,660.41 €
	RESTRVINEY Restructuring and Conversion of Vineyard Areas	48,885,121.44 €	40.00%	100.00%	19,554,048.58 €
	INVWINE Investments in tangible and intangible assets related to viticultural systems – with the exception of projects eligible for the intervention category referred to in subparagraph (a) – processing facilities, infrastructure of wine-growing enterprises, and marketing structures and instruments	57,788,555.34 €	40.00%	100.00%	23,115,422.14 €
	ADVI1 Advisory services and technical assistance, particularly with regard to sustainable pest and disease control methods, the sustainable use of plant protection products and veterinary drugs, climate change adaptation and mitigation, working conditions and employer obligations, and occupational health and safety	Hops: 11 million in total; no separate information on the amount of this intervention	40.00%	100.00%	
	CLIMA Measures to Mitigate Climate Change and Adapt to it	Hops: 11 million in total; no separate information on the amount of this intervention	40.00%	100.00%	
First Pillar					**4,258,650,790.36 €**
Without Direct Payments					**3,870,447,531.82 €**
Second Pillar (European Agricultural Fund for Rural Development, EAFRD)	EL-0101: Management obligations to improve climate protection	147,419,867.71 €	100.00%	70.00%	103,193,907.40 €
	EL-0103: Management obligations to improve soil conservation	248,935,412.56 €	40.00%	100.00%	99,574,165.02 €
	EL-0102: Management obligations to improve water quality	218,650,865.91 €	40.00%	100.00%	87,460,346.36 €
	EL-0105: Management obligations to improve biodiversity	1,759,961,613.84 €	100.00%	70.00%	1,231,973,129.69 €
	EL-0107: Management Obligations for Sustainable Forest Management	17,000,000.00 €	100.00%	70.00%	11,900,000.00 €
	EL-0108: Organic Farming	2,339,935,481.19 €	100.00%	70.00%	1,637,954,836.83 €

Fund	Interventions	Biodiversity Contribution	Coefficient	Weighting Factor	Final Contribution
	EL-0110: Management Obligations for the Conservation of Genetic Resources	9,881,767.10 €	100.00%	100.00%	9,881,767.10 €
	EL-0111: Income Support for Reforestation	519,030.00 €	100.00%	70.00%	363,321.00 €
	AECA				**3,182,301,473.41 €**
	EL-0301: Management Obligations for the Implementation of Natura 2000	96,601,302.24 €	100.00%	50.00%	48,300,651.12 €
	EL-0201: Compensation Allowance for Disadvantaged Areas	1,019,070,842.99 €	100.00%	50.00%	509,535,421.50 €
	EL-0401: Non-productive water management investments	178,563,931.20 €	40.00%	100.00%	71,425,572.48 €
	EL-0402: Physical Infrastructure - Flood Control, Coastal Protection	255,380,286.64 €	40.00%	100.00%	102,152,114.66 €
	EL-0403: Productive Investments by Individual Agricultural Enterprises	930,823,263.95 €	40.00%	100.00%	372,329,305.58 €
	EL-0407: Non-productive investments in the forestry sector	98,142,194.00 €	40.00%	100.00%	39,256,877.60 €
	EL-0408: Non-productive investments to protect natural resources	244,202,957.77 €	100.00%	70.00%	170,942,070.44 €
Second Pillar					**4,496,243,486.78 €**
Total					**8,754,894,277.14 €**

Annex II

To assess how much is spent on biodiversity through the **Joint Task for the Improvement of Agricultural Structures and Coastal Protection (GAK)**, the purpose of the measures was searched for mention of sustainability and climate. As funding is often reported at higher level, the results include measures that do not contribute to biodiversity such as investments in barns, forest roads etc. Therefore, a more conservative estimate was also made which only includes measures more clearly linked to biodiversity.

The less conservative estimate includes the following:

- Funding Area 2 Support for Agricultural Businesses
  - Measure A1 Agricultural Investment Incentive Programme
  - Measure 2B Consulting
- Funding Area 3 Improving Marketing Structures
  - Measure B Fish Processing and Marketing
- Funding Area 4 Market- and location-specific, environmentally sound agricultural practices, including contract-based nature conservation and landscape management
- Funding Area 5 Forestry
  - All measures except for measure 5C Forestry Associations
- Funding Area 7 Water Management:
  - Measure 2 Other Water Management Measures
- Funding Area 9 Disadvantaged Areas
- The Special Framework Plan for Insect Protection Measures in the Agricultural Landscape*

The more conservative estimate includes Funding Area 4 and 5 (except for Measure 5C) and the Special Framework Plan for Insect Protection Measures in the Agricultural Landscape.



* This special framework plan was discontinued in 2024. However, in 2024 and 2025 funding was still provided to measures of this special framework plan. This funding is noted down in the actual expenditures overview and included in this analysis.

	Target 2021	Actual 2021	Target 2022	Actual 2022	Target 2023	Actual 2023	Target 2024	Actual 2024	Target 2025	Actual 2025	Target 2026
FA 2 A1: Agricultural Investment Incentive Programme	78,329,000 €	66,280,792 €	178,083,003 €	75,213,825 €	64,315,624 €	65,594,629 €	73,832,947 €	50,327,236 €	82,301,524 €	67,143,793 €	103,899,130 €
FA 2 B: Consulting	4,800,000 €	2,241,115 €		3,146,550 €	6,450,000 €	4,530,077 €	3,537,390 €	3,515,917 €	4,150,000 €	6,169,272 €	3,413,500 €
FA 3 B: Fish Processing and Marketing	1,026,000 €	175,588 €	31,084,623 €	187,279 €	966,873 €	278,953 €	883,537 €	14,165 €	650,000 €	76,047 €	700,000 €
FA 4: Market- and location-specific, environmentally sound agricultural practices, including contract-based nature conservation and landscape management	205,766,000 €	208,911,359 €	207,152,914 €	171,641,369 €	141,430,159 €	123,314,963 €	308,287,896 €	206,321,158 €	288,182,729 €	225,207,759 €	331,438,353 €
FA 5: Forestry (all measures except for measure 5C Forestry Associations)	52,734,000 €	242,224,554 €	313,444,269 €	223,874,066 €	235,954,634 €	209,199,877 €	242,176,203 €	112,276,487 €	190,471,071 €	36,606,058 €	192,516,111 €
FA 7 2: Other Water Management Measures	58,493,000 €	54,259,357 €	160,530,216 €	59,889,782 €	52,533,565 €	45,449,909 €	54,757,294 €	27,766,520 €	60,525,397 €	30,842,151 €	69,187,522 €
FA 9: Disadvantaged Areas	88,844,000 €	94,216,117 €	90,630,000 €	85,408,040 €	93,602,797 €	101,453,459 €	98,919,145 €	100,789,063 €	107,638,285 €	101,762,260 €	105,531,000 €
The Special Framework Plan for Insect Protection Measures in the Agricultural Landscape (SFP)	79,910,000 €	97,104,318 €	214,536,764 €	92,154,624 €	234,460,567 €	196,300,800 €		104,810,854 €		33,285,907 €	
Total	569,902,000 €	765,413,200 €	1,195,461,789 €	711,515,535 €	829,714,219 €	746,122,667 €	782,394,412 €	605,821,400 €	733,919,006 €	501,093,247 €	806,685,616 €
Only FA 4 + FA 5 + SFP	338,410,000 €	548,240,231 €	735,133,947 €	487,670,059 €	611,845,360 €	528,815,640 €	550,464,099 €	423,408,499 €	478,653,800 €	295,099,724 €	523,954,464 €

Total Actual										**3,329,966,049 €**
Total Target										**4,918,077,042 €**
Only FA 4 + FA 5 + SFP Actual										**2,283,234,153 €**
Only FA 4 + FA 5 + SFP Target										**3,238,461,670 €**

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