

**UNVEILING THE NARRATIVES BEHIND THE NATURE RESTORATION
LAW: ANALYSING THE DRIVING FORCES OF EU RESTORATION
REGULATION**

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Every society develops narratives embodying a collective understanding of the world's nature, functioning, fundamental values, and the roles of different actors. These narratives are central to policy analysis as they reflect institutional structures and reinforce collective aspirations. Considering the narratives behind policy actors' actions helps understand their strategic behaviour. This article examines a recent European Union environmental regulation that attracted significant attention and controversy: the Nature Restoration Law (EU Reg 2024/1991). The article explores narratives as fundamental assumptions and patterns that underpin the regulation and examines their use in strategic communication. The analysis applies the Narrative Policy Framework to the Commission's initial 2022 proposal, the final approved regulation, and accompanying documents. Findings reveal that, despite important innovations in environmental policy, such as the introduction of new environmental protection domains, the assumptions and narratives supporting the regulation remain anchored in a traditional managerial perspective, in which nature is considered a source of resources essential to human life, to be sustainably controlled and managed.

Keywords: European environmental policy; nature restoration law; narratives; narrative policy framework; narrative strategies

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Acknowledgments: This study was supported by the PhD in Agro-Food System (Agrisystem) of the Università Cattolica del Sacro Cuore (Italy).

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I INTRODUCTION

The Nature Restoration Law (NRL) (EU Reg 2024/1991) is a recent, much-debated European environmental law. This regulation is rooted in 2019, when the European Union (EU) structured an action plan called the Green Deal (COM/2019/640) to tackle the complex challenges related to

environmental and climate change.¹ With the NRL, the EU positioned itself as a global leader in addressing ecological restoration and its potential impacts, with legally binding targets as the overall objective.

The EU has different legal frameworks, strategies and action plans with diverse objectives regarding nature conservation and the restoration of habitats and species (e.g., the Habitats Directive (92/43/EEC), Water Framework Directive (2000/60/EC), Floods Directive (2007/60/EC), Marine Strategy Framework Directive (2008/56/EC), and Birds Directive (2009/147/EC)). However, the European Commission (the Commission) explicitly states that protection is incomplete, limited restoration was achieved, and implementation and compliance with legislation are insufficient.² In response to these acknowledged shortcomings and the pressing need for more comprehensive environmental action, the Commission tabled a proposal for the Nature Restoration Regulation. The 22 June 2022 proposal was finally published.

The proposal itself was highly controversial – it involved two years' negotiation among the European Parliament, the Council, and the Commission and was finally adopted on 17 June 2024 after a controversial vote, many amendments and lots of possible exceptions and disclaimers which reduced its scope and specific objectives.³

1 European Environment Agency, *Governance in Complexity - Sustainability Governance under Highly Uncertain and Complex Conditions* (2024).

2 European Commission, 'Proposal for a Regulation of the European Parliament and of the Council on nature restoration' COM(2022) 304 final.

3 An Cliquet et al., 'The Negotiation Process of the EU Nature Restoration Law Proposal: Bringing Nature Back in Europe against the Backdrop of Political Turmoil?' (2024) 32(5) *Restoration Ecology*.

Existing literature provides a picture of the innovation of the law, underlying the novelties in addressing environmental issues.⁴ Several studies have highlighted the possible difficulties in its application and enforceability due to the strong dilution during the negotiation.⁵ However, scholars have not engaged in providing an analysis of the NRL from a linguistic perspective, analysing the assumptions and narratives behind the regulation. To address this research gap and contribute to the critical literature, this paper aims to identify, analyse and describe the underlying assumptions, values and beliefs that have informed and shaped the NRL. In this regard, the Narrative Policy Framework (NPF) is viewed as an analytical lens that establishes concepts

4 Eleonora Ciscato, 'Il carattere trasformativo del Regolamento europeo sul Ripristino della Natura nelle politiche ambientali' in *Rivista Giuridica dell'Ambiente* (2024); Maria Vittoria Ferroni, 'The Loss of Biodiversity as a Serious Environmental Threat: The Need for a New Legal Paradigm' in *Biodiversity Laws, Policies and Science in Europe, the United States and China* (2024); Jan Pollex, Andrea Lenschow, 'When Talk Meets Actions—Return to Commission Leadership in EU Environmental Policy-Making with the European Green Deal' (2024) *Journal of European Public Policy*; Carmela Leone, 'The Obligation of Member States to Guarantee River Connectivity in Light of the Most Recent Reforms' (2024) *Federalismi.it* 129; Elisa Cavallin, 'Nature Restoration and Agriculture and Forestry: At the Opposite Side of the Fighting Ring or Compatible After All? An Analysis of the Proposal and the Final Agreement on the Nature Restoration Law' (2024) 33 *European Energy and Environmental Law Review* 48; Tiina Paloniitty, Susanna Kaavi, Li Yuan, 'Regulating Industrial Emissions, Water Management or Aquatic Biodiversity? Navigating the Evolving European Legal Landscape on Waters' (2024) 33 *European Energy and Environmental Law Review* 70.

5 Bruna Paolinelli Reis et al., 'The Added Value of the Long-Term Ecological Research Network to Upscale Restoration in Europe' (2024) 366 *Journal of Environmental Management*; Twan Stoffers et al., 'Reviving Europe's Rivers: Seven Challenges in the Implementation of the Nature Restoration Law to Restore Free-Flowing Rivers' (2024) 11 *WIREs Water* e1717; Raisa Mäkipää et al., 'We Need Targeted Policy Interventions in the EU to Save Soil Carbon' (2024) 12 *Frontiers in Environmental Science*; Cliquet et al. (n 3).

such as belief systems and narrative strategies to consider specific narrative characteristics in public policy sources.⁶ Since its inception, the NPF and its approach to analysing policy processes have been applied to environmental disputes,⁷ specifically those facing climate change.⁸ Historically, environmental issues have been a source of significant polarisation, with numerous narratives proposed by various actors. Each narrative is laden with foundational assumptions and values.⁹

This study adopts the analytical lens of the NPF to answer the following research questions: 1) what are the implicit narratives within the NRL? 2) What kinds of narratives are used in communication to legitimise political action? And 3) What kind of axiological approach to environmental issues is

6 Michael D. Jones, Mark K. McBeth, 'A Narrative Policy Framework: Clear Enough to Be Wrong?' (2010) 38 *Policy Studies Journal* 329; Elizabeth A Shanahan, Michael D Jones, Mark K. McBeth, 'How to Conduct a Narrative Policy Framework Study' (2018) 55 *The Social Science Journal* 332.

7 Simon Schaub, 'Public Contestation over Agricultural Pollution: A Discourse Network Analysis on Narrative Strategies in the Policy Process' (2021) 54 *Policy Sciences* 783; Sabine Bailey et al., 'How Narratives Shape Policy: Lessons Learned from Port Projects Adjacent to Coral Reefs in Florida and the Cayman Islands' (2022) 144 *Marine Policy*; Ricky N. Lawton, Murray A. Rudd, 'Scientific Evidence, Expert Entrepreneurship, and Ecosystem Narratives in the UK Natural Environment White Paper' (2016) 61 *Environmental Science and Policy* 24.

8 Ben Galloway et al., 'The Effect of Policy Narratives on Policy Elite versus Public Preferences for Hydraulic Fracturing Regulation' (2024) 41 *Review of Policy Research* 613; Michael D. Jones, 'Communicating Climate Change: Are Stories Better than "Just the Facts"?' (2014) 42 *Policy Studies Journal* 644; Desera A. Crow et al., 'A Narrative Policy Framework Analysis of Wildfire Policy Discussions in Two Colorado Communities' (2017) 45 *Politics and Policy* 626; Mark K. McBeth, Donna L. Lybecker, Jessica Sargent, 'Narrative Empathy: A Narrative Policy Framework Study of Working-Class Climate Change Narratives and Narrators' (2022) 185 *World Affairs* 471.

9 Ellen Palm et al., 'Narrating Plastics Governance: Policy Narratives in the European Plastics Strategy' (2022) 31 *Environmental Politics* 365.

brought forward with this regulation by the EU Commission?

The analysis focuses on the following documents: EU Reg. 2024/1991,¹⁰ Proposal (COM/2022/304),¹¹ Impact Assessment annexed,¹² Brochure on Nature Restoration—‘Restoring nature. For the benefit of people, nature and the climate’,¹³ factsheets on ‘Biodiversity and resilience’,¹⁴ and ‘Nature Restoration Law’.¹⁵

To address the abovementioned issues, the paper is organised as follows. Section II presents the theoretical framework, elaborating the relationship(s) between policies and narratives, analysing the narratives considered in this study, and illustrating the NPF and its concepts. Section III presents the research design, data, and methods. Section IV presents the findings. Section V summarises and concludes the study.

10 Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 [2024] OJ L 2024/1991, 29.7.2024.

11 European Commission (n 2).

12 Commission Staff Working Document, ‘Impact Assessment Accompanying the proposal for a Regulation of the European Parliament and of the Council on nature restoration’ SWD (2022) 167 final.

13 Directorate-General for Environment (European Commission), *Restoring Nature: For the Benefit of People, Nature and the Climate* (Publications Office of the European Union, 2022) <<https://data.europa.eu/doi/10.2779/439286>> accessed 18 August 2023.

14 ‘Factsheet – Biodiversity and Resilience’ (European Commission) <https://ec.europa.eu/commission/presscorner/detail/en/fs_22_3749> accessed 1 October 2024.

15 ‘Factsheet – Nature Restoration Law’ (European Commission) <https://ec.europa.eu/commission/presscorner/detail/en/fs_22_3748> accessed 1 October 2024.

II THEORETICAL CONSIDERATIONS

1. *Narratives and Policy Analysis*

Public policies are instruments through which public authorities define and operationalise strategic priorities. These policies articulate and promote public interest, allocate temporal and attentional resources, direct investment strategies, engage with innovation, establish regulatory frameworks, and address the socio-educational dimensions of society, among other critical areas of governance.¹⁶

Distinguishing between governance approaches based on our understanding of the world and those that shape how we perceive the world is inherently challenging.¹⁷ No regulation exists in a value-free vacuum. Facts and values are intertwined, with scientific and legal imaginaries being tacitly assumed and incorporated into legal or policy interventions.¹⁸ It is fundamental to understand the axiological content of regulations, that is, the reasoning that underlies the choices made by policymakers who claim to act in the public interest. This reasoning encompasses institutional practices, discourses, techniques, and instruments through which contemporary governments claim legitimacy.¹⁹

‘Narratives’ provide an illuminating explanation regarding the complexity of interactions between public policies and political actors, events, contexts,

16 Sara Valaguzza, ‘Climate Change: From Science to Policies, Backward and Forward’ in Sara Valaguzza and Mark Alan Hughes (eds), *Interdisciplinary Approaches to Climate Change for Sustainable Growth* (Springer International Publishing 2022) .

17 Sheila Jasanoff, *Science and Public Reason* (1st edition, Routledge 2013).

18 Directorate-General for Research and Innovation (European Commission), *Taking European knowledge society seriously* (Publications Office of the European Union, 2007).

19 Sheila Jasanoff, *States of Knowledge: The Co-Production of Science and the Social Order* (Routledge 2004).

and outcomes.²⁰ In qualitative research literature, ‘narrative’ has various meanings.²¹ In the field of Science and Technology Studies, narratives are well-known and accepted rhetorics that facilitate the consolidation of implicit premises and assumptions in scientific, social, and political decisions.²²

Narratives that shape society operate at many different levels and in different forms. There are the so-called master narratives, sweeping accounts, such as that which conflates general societal progress with technological advance; or more confined narratives focus on specific, local events. Public policy narratives usually lie somewhere between these two levels. They are framed by and build on master narratives about society and how it should function; but they also articulate diverse, more situated narratives pertaining to particular causes, effects and desired endpoints.²³

The central role of narratives in organising and explaining complex social science phenomena cannot be overstated. Not being mere anecdotal constructs, narratives serve as foundational elements in the epistemological processes of knowledge construction and dissemination in social contexts.²⁴ They have increasingly become an important lens through which policy studies are analysed, offering both qualitative and quantitative insights. Narratives in policy studies are multifaceted and incorporate elements of literary theory, psychology, communication and public policy. The present study is based on the theoretical reference framework of the NPF—a specific

20 Christopher M. Weible, Paul A. Sabatier, ‘Weible, Christopher M., and Paul A. Sabatier. 2017. *Theories of the Policy Process*. Boulder, CO: Westview Press’ (2017) 3 *European Policy Analysis* 397.

21 Donald E. Polkinghorne, ‘Narrative Configuration in Qualitative Analysis’ (1995) 8 *International Journal of Qualitative Studies in Education* 5.

22 Sheila Jasanoff, *Designs on Nature: Science and Democracy in Europe and the United States* (Princeton University Press 2005).

23 Directorate-General for Research and Innovation (European Commission) (n 18), 73.

24 *ibid*.

tool for understanding the role and forms of narratives—to study them using a quantitative, structuralist, and positivistic approach.²⁵

2. *The Narrative Policy Framework (NPF)*

The NPF provides a structured approach for understanding the role of narratives in policy processes. Developed by Jones and McBeth,²⁶ it posits that narratives can be empirically studied to reveal their influence on policy outcomes. It delineates narratives into core components—setting, characters (heroes, villains, victims), plots and morals—congruent with structuralist methodologies that allow for hypothesis testing and falsification.²⁷ The NPF allows the integration of narratives into traditional policy analysis, facilitating increased understanding of how stories shape public policies.

Focusing on the most recent European environmental regulation, the NRL, this article adopts a meso-level analysis: research is grounded at the level of political actors and how they construct, use, and communicate to influence the policy process.²⁸ To answer the research questions, the ‘policy narrative content’ model was used in this study. Unlike narrative elements (setting, characters, plot, morals), the building blocks of narratives, policy narrative content provides meaning within the narrative elements to create realities. The focus is on the analysis of content characteristics—belief systems and narrative strategies—rather than structural characteristics.

The NPF recognises that while the structural elements of narratives are fundamental, the content within these structures provides meaning, thereby influencing policy perspectives and decisions.²⁹ This variation in content was traditionally viewed as highly nuanced, with the belief that each narrative is

25 Jones and McBeth (n 6).

26 *ibid.*

27 *ibid.*

28 Shanahan, Jones and McBeth (n 6).

29 *Ibid.*

unique. The NPF challenges this view by suggesting that variations in policy narratives are not random but can be systematically measured based on the belief systems and narrative strategies that shaped them.³⁰

Belief systems are stable sets of implicit values and beliefs that orient individuals, groups, coalitions, and societies in the context of political debates.³¹ These orientations are not spontaneous but reflect consistent values such as equality, freedom, and security.³² The NPF posits that these orientations provide a stable framework that helps understand how individuals and groups interpret and communicate policy narratives' content.³³

Narrative strategies are methods used by narrators to intentionally shape political reality. These strategies involve deliberate manipulation of narrative elements to achieve specific goals such as persuasion, recruitment and conflict management.³⁴ The NPF identifies several common narrative strategies: scope of conflict, causal mechanisms and devil shift. Scope of conflict involves distributing the costs and benefits of the proposed policy among the characters in a narrative. Causal mechanisms explain the cause-

30 Jones and McBeth (n 6).

31 On belief systems, see Shanahan, Jones and McBeth (n 6). The concept has also been explored in the context of international law, where Jean d'Aspremont, *International Law as a Belief System* (Cambridge University Press 2017) 4, defines them as "a set of mutually reinforcing beliefs prevalent in a community or society".

32 These examples of core political values (equality, freedom, security) are drawn from Shanahan, Jones and McBeth (n 6). On the broader theoretical framework of values in policy analysis, see Milton Rokeach, *The Nature of Human Values* (Free Press 1973); Paul Sabatier and Hank Jenkins-Smith, *Policy Change and Learning: An Advocacy Coalition Approach* (Westview Press 1993); Armin von Bogdandy, 'Founding Principles of EU Law: A Theoretical and Doctrinal Sketch' (2010) 16 *European Law Journal* 95.

33 Shanahan, Jones and McBeth (n 6).

34 *ibid.*

and-effect relationships within a narrative, influencing how policy issues are perceived and addressed. The devil-shift strategy exaggerates opponents' power and malevolence to mobilise support and justify policy action against them.³⁵ These strategies help narrators communicate their policy perspectives effectively, thereby influencing public opinion and policy outcomes.³⁶

III RESEARCH DESIGN AND METHODS

1. *Data Collection*

Having established the theoretical framework, attention now turns to the methodology followed. This study adopted a non-experimental design.³⁷ Content analysis of the following documents was conducted to consider the processes connected with the NRL, from conception to divulgation to all stakeholders: EU Reg. 2024/1991,³⁸ Proposal (COM/2022/304),³⁹ Impact Assessment Annexed,⁴⁰ Brochure on Nature Restoration—'Restoring nature. For the benefit of people, nature and the climate',⁴¹ and factsheets on 'Biodiversity and resilience',⁴² and 'Nature Restoration Law'.⁴³

35 *ibid.*

36 *ibid.*

37 *ibid.*

38 Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 [2024] OJ L 2024/1991, 29.7.2024 (n 10).

39 European Commission (n 2).

40 Commission Staff Working Document (n 12).

41 Directorate-General for Environment (European Commission) (n 13).

42 'Factsheet - Biodiversity and Resilience' (n 14).

43 'Factsheet - Nature Restoration Law' (n 15).

2. *Data Analysis*

A thematic analysis of the documents was conducted, being a foundational method ‘for identifying, analysing, and reporting patterns (themes) within data’.⁴⁴ The thematic analysis followed an inductive, data-driven approach, exploring the whole dataset looking for the occurrence and recurrence of themes related to the research questions (i.e., themes connected with belief systems and narrative strategies), without using a pre-existing coding framework. The theoretical framework guided the distinction between belief systems and narrative strategies, without imposing specific thematic areas, categories or predetermined content codes.

The thematic analysis involved the following steps:⁴⁵

- Data familiarisation: immersion in the texts to develop familiarity with the data and engage in the analytical procedures.
- Data coding: labelling each relevant unit of data, which, depending on the specific instances, comprised whole sentences or complete paragraphs, with a code symbolising or summarising that extract’s meanings. The original data were rearranged into a more manageable and meaningful form through structured coding using Nvivo software.⁴⁶ Because the coding process is mainly inductive, all units of data were coded, with reference to the identified belief systems and narrative strategies.
- Searching for themes: common and recurring patterns and relationships in the codes were searched to develop an abridged list of

44 Virginia Braun, Victoria Clarke, ‘Using Thematic Analysis in Psychology’ (2006) 3 *Qualitative Research in Psychology* 77, 79.

45 Mark Saunders, Philip Lewis, Adrian Thornhill, ‘Research Methods for Business Students’ (2019) <<https://elibrary.pearson.de/book/99.150005/9781292208794>> accessed 20 December 2024.

46 Braun and Clarke (n 38).

themes related to the research questions. A theme is ‘a broad category incorporating several codes that appear to be related to one another which indicates an idea that is important to the research question’.⁴⁷ Building on the theoretical framework, these themes were classified as belief systems (general, connected with a managerial approach, or connected with involved actors) and narrative strategies (2 scopes of conflict and 30 causal mechanisms). Given the number of causal mechanism strategies, they were explained by summarising the relationship types and using graphics with different colours for the different relationships and different thicknesses of arrows in relation to the number of occurrences of a specific relationship (if the arrow that connect two themes was thicker there were more occurrence of the specific relationship).

The results are presented in the tables. To compare the number of occurrences despite different numbers of pages in the documents, each table contains an ‘n/npgs’ column; ‘n’ is the number of occurrences and ‘npgs’ the number of pages.

IV FINDINGS AND DISCUSSION

Following the theoretical framework in Section II and data collection and research design and methods in Section III, this Section outlines and discusses the main findings. The section is structured into two main parts, each addressing and reflecting the two core assumptions of the analytical theory adopted in this study: the belief systems and narrative strategies. These two parts are further divided into sub-sections to better explore and describe key characteristics. Specifically, regarding belief systems, the discussion is organised into three sub-sections: the first addresses more general belief systems related to environmental themes; the second focuses on belief systems connected to the actors involved in the regulation; and the third

⁴⁷ Saunders, Lewis, Thornhill (n 39), 585.

examines belief systems specific to the economic-managerial context. For the narrative strategies, the analysis is also divided into two sub-sections, each corresponding to two classical types identified within the theoretical framework and observed in the documents analysed: the scope of conflict and the causal mechanisms.

1. *Belief Systems*

Twelve types of belief systems were identified, connected with the general approach followed by the Commission regarding environmental issues (Table 1).

Table 1. Belief systems

Belief Systems	Total n.	Document											
		EU Reg 2024/1991		Proposal		Imp. Ass		Factsheet_Nature		Factsheet_Biodiversity		Brochure_Nature	
		n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs
Ecosystem services - ecological, economical, social functions	63	10	0,244	17	0,213	31	0,258	3	1,5	0	0	2	0,083
Human activities are causing changes, nature pushed out from lives	6	1	0,024	0	0	1	0,008	0	0	0	0	4	0,167
Human beings outside ecosystem - environment (keeper - manager)	26	3	0,073	2	0,025	16	0,133	0	0	0	0	5	0,208
Nature as a toolbox (nature-based solution, ecc)	30	6	0,146	7	0,088	4	0,033	1	0,5	3	1,5	9	0,375
Nature presents a range of aesthetic, spiritual and restorative values to people (not only in monetary terms)	2	0	0,000	0	0	2	0,017	0	0	0	0	0	0
Nature time is different, long time needed	12	3	0,073	0	0	7	0,058	0	0	0	0	2	0,083
Neutrality of expertise and science (informatics - data, ecc)	8	4	0,098	3	0,038	1	0,008	0	0	0	0	0	0
New technologies increase speed, effectiveness of reporting	3	0	0,000	1	0,013	2	0,017	0	0	0	0	0	0
One Health	4	1	0,024	2	0,025	1	0,008	0	0	0	0	0	0
Policy must be science-based or evidence based	55	19	0,463	12	0,150	21	0,175	0	0	0	0	3	0,125
Risks are possible in evaluation (scientific uncertainties, ecc)	1	0	0,000	0	0	1	0,008	0	0	0	0	0	0
Speed imperative - urgency act before too late (efficiency)	16	2	0,049	5	0,063	4	0,033	0	0	1	0,5	4	0,167

Some highlighted themes pertain to the ecological thinking behind the legislation, whereas others relate to interactions between science and policy. Three closely related categories were most prevalent: ‘ecosystem services—ecological, economical, and social functions’, ‘human beings outside ecosystem—environment (keeper-manager)’, and ‘nature as a toolbox (nature-based solution, etc.)’. They refer to an overarching narrative within anthropocentric ecological thinking: humans are in a privileged position and responsible for managing the environment. They are not simply exploiters of resources but can undeniably benefit from them (ecosystem services—ecological, economic, and social functions), especially if their resource management is conscious and ‘sustainable’. The primary reference point is

the current paradigm of ecosystem services linked to ecological restoration. Ecosystem services are the benefits people derive from ecosystems, co-produced through interactions between ecosystems and society. It refers to the functions and processes provided by ecosystems that directly or indirectly generate multiple benefits essential for human survival and well-being. It permeates all the regulations to which it directly refers.⁴⁸ It is noteworthy that in the final version of the approved regulation, an objective has been added to Article 1: food security. Thus, while the initial focus was solely on ecosystem restoration to cope with climate change and biodiversity loss, it is now emphasised that this is closely linked to a vital need for human beings: food security, a specific ecosystem service.

During examination, it emerged that the term ‘nature’ was not used often, except to imply it is an example of human activity (see the code ‘nature as a toolbox (nature-based solution, etc.)’). Humans emerge as external protectors by awareness of the ecosystem’s current degradation status quo

48 The concept of ‘ecosystem services’ was first discussed in Paul R. Ehrlich and Harold A. Mooney, ‘Extinction, Substitution, and Ecosystem Services’ (1983) 33 *BioScience* 248; The Millennium Ecosystem Assessment (MEA), initiated by Kofi Annan in 2000 and published in 2005, is a major study of human impacts on the environment. *Ecosystems and Human Well-Being: Synthesis; a Report of the Millennium Ecosystem Assessment* (Island Press 2005); Various governments used ecosystem services and natural capital frameworks to achieve specific policy goals. Beyond the various categories, ecosystem services are increasingly attracting the interest of policymakers at national and international levels. The valorisation of natural goods (in a different logic from environmental ethics) is based on the fact that nature provides services that can be quantified in terms of added or subtracted value in the face of certain events attributable to human behaviour.

For more information, look at: Sara Valaguzza (ed), *Esplorazioni di diritto dell’ambiente* (Editoriale Scientifica 2024); Robert Costanza and Herman E Daly, ‘Natural Capital and Sustainable Development’ (1992) 6 *Conservation Biology* 37; Stefan Zerbe, *Restoration of Ecosystems – Bridging Nature and Humans: A Transdisciplinary Approach* (Springer 2023)

(although the anthropogenic cause is never explicit except in one fact sheet (see the code ‘human activities are causing changes, nature is being pushed out of our lives’)). They are not seen as integral parts of the environment–nature system (humans outside the ecosystem–environment as keepers–managers). This role is within the paradigm of ecosystem restoration: from an awareness of the current degradation, humans act to bring ecosystems to a state they consider *good*, adding to the passive protection–observation of ecosystems. The idea of human responsibility is absent in the texts under consideration. Degraded ecosystems are mentioned in the definition of ‘restoration’ and in laws and other documents, but the anthropogenic cause is not.

Regarding other ecological belief systems related to the human–non-human relationship, differences can be observed between official institutional documents (regulations, proposals, impact assessments with annexes) and documents for dissemination (brochures, fact sheets). The anthropogenic causes of the current state of terrestrial and marine ecosystems are only present in the dissemination documents. These documents generally discuss the relationship between humans and their environment and the need to act urgently (speed imperative–act urgently before it is too late (efficiency)). Another belief system, evident throughout the documents and featuring prominently in the adopted regulation, concerns the need for decisions to be based on scientific evidence. This perspective holds that all issues related to scientific data are neutral and transcend partisan interests (neutrality of expertise and science (informatics–data, etc.)).

Both dissemination and the impact assessment documents emphasise that the timescales of ecosystems are orders of magnitude different from ours and that more time is needed to visualise the benefits of actions taken today (nature’s time is different, long timespan). For example, ecological restoration risks are insufficient to address biodiversity loss unless long-term approaches (from centuries to millennia) focus on the complexity of the degraded ecosystem, integrating approaches based on interaction networks and

evolutionary potential.⁴⁹

Occasional reference is made to the ‘One Health approach’, connected to the close interdependence between human health and planet health. It is emphasised in two instances in the Impact Assessment that nature is not just a repository of resources, but has aesthetic, spiritual, and restorative values for people. Finally, in response to the urgency to act, new technologies are offered that can increase the speed and validity of responses (new technologies increase speed, effectiveness of reporting), even considering that errors are possible in scientific assessments, implying that risk is never zero (risk is possible in assessment (scientific uncertainties, etc.)).

A. Actor Analysis.

The texts use different expressions to refer to people: citizens, people, public, society, and stakeholders, which have specific meanings according to the message (Table 2). ‘Citizen’ is generally used regarding consultation with citizens, the stages preceding the proposal by the Commission, or the need for Member States to consult citizens in national recovery plans (‘citizen science’ is mentioned in this last context). ‘People’ is used almost exclusively in dissemination texts in which the Commission presents its proposal to the public and seeks consensus. ‘Society’ is used as a neutral term where cost-benefit analyses and beneficial added value for society are discussed.

The two most-used terms deserving attention are ‘public’ and ‘stakeholders’. From scholarship, stakeholders are groups or individuals who can affect or are affected by the achievement of an organisation’s objectives.⁵⁰ This

49 David Moreno-Mateos et al., ‘The Long-Term Restoration of Ecosystem Complexity’ (2020) 4 *Nature Ecology & Evolution* 676.

50 Robert Edward Freeman, *Strategic Management: A Stakeholder Approach* (Pitman 1984); R Edward Freeman, ‘The Politics of Stakeholder Theory: Some Future Directions’ (1994) 4 *Business Ethics Quarterly* 409.

includes employees, customers, suppliers, local communities, and competitors.

Regarding the NRL, this term is used to refer to all interested parties, interpreting interest as exclusively economic. Member States and citizens are not considered stakeholders unless they have economic activities that overlap with regulations. This is a particular interpretation of the term. However, the ‘public’ is seen as citizens who do not play an active role in the construction of the proposal but are impacted by the proposal and regulation. The legislature refers to the public when discussing consultation, access to data and justice, referring to local communities and the concepts of health, well-being, and survival. There generally is a dichotomy between the terms ‘public–consultation’ and ‘stakeholder–involvement’. Stakeholders (actors with economic interests) are consulted directly and can participate in the process.

Table 2. Belief systems – Analysis of terms referring to citizens

Belief systems - Actor Analysis	Total n.	Document											
		EU Reg 2024/1991		Proposal		Imp. Ass		Factsheet_Nature		Factsheet_Biodiversity		Brochure_Biodiversity	
		n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs
Citizen	24	5	0,122	6	0,075	12	0,100	0	0	0	0	1	0,042
People	17	3	0,073	4	0,050	1	0,008	2	1	2	1	5	0,208
Public	49	23	0,561	16	0,200	9	0,075	0	0	0	0	1	0,042
Society	25	3	0,073	4	0,050	18	0,150	0	0	0	0	0	0
Stakeholder	51	10	0,244	14	0,175	24	0,200	0	0	0	0	3	0,125

2. Managerial Approach.

Economic factors are central to all the documents considering belief systems. Seven themes related to belief systems are specifically connected with a distinct managerial approach (Table 3). By focusing on these aspects, the ecosystem services paradigm assigns economic value to nature and to its individual components.⁵¹

51 Valaguzza (n 42).

Table 3. Belief system – Managerial approach

Belief systems - Managerial approach	Total n.	Document											
		EU Reg 2024/1991		Proposal		Imp. Ass		Factsheet_Nature		Factsheet_Biodiversity		Brochure_Nature	
		n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs
Economies of scale	2	0	0,000	1	0,013	1	0,008	0	0	0	0	0	0
Natural capital	6	3	0,073	3	0,038	0	0	0	0	0	0	0	0
Possible investments	32	12	0,293	8	0,100	9	0,075	1	0,5	0	0	2	0,083
Costs (without writing about possible investments)	17	4	0,098	6	0,075	7	0,058	0	0	0	0	0	0
'Cost-benefit' analysis	60	4	0,098	9	0,113	36	0,300	2	1	1	0,5	8	0,333
Stakeholder	51	10	0,244	14	0,175	24	0,200	0	0	0	0	3	0,125
Other	7	4	0,098	3	0,038	0	0	0	0	0	0	0	0

2. Narrative Strategies

Following the analysis on belief systems, this section illustrates another way through which narrators shape policy realities: ‘narrative strategies’ – narrative elements the narrator uses to persuade, recruit, dampen or inflame conflict, find consensus, or legitimise choices.⁵² The analysis highlights two major types presented within the NPF: ‘scope of conflict’ and ‘causal mechanism’ (Tables 4 and 5). Scope of conflict distributes the costs and benefits of a proposed policy to the characters in the policy narrative. Causal mechanisms posit a causal relationship within the policy issue through the strategic use of characters and things in the narrative.⁵³

A. Scope of Conflict.

The analysis reveals cost-benefit analysis as the most common narrative strategy, used in various contexts, referring to the long-term benefits of implementing ecosystem restoration measures that involves significant initial costs – the Commission is aware of this and emphasises that these costs can be covered by national or European funds. The long-term benefits outweigh the costs, making it worthwhile.

⁵² Shanahan, Jones and McBeth (n 6).

⁵³ *ibid.*

The second narrative strategy concerns the benefits accrued, on the one hand, to the EU by positioning itself as a global leader regarding contemporary challenges. Ecosystem restoration is high on the international agenda (2050 vision of the Convention on Biological Diversity, United Nations Convention to Combat Desertification, 2030 Agenda for Sustainable Development, and UN Decade of Ecosystem Restoration all call for the protection and restoration of ecosystems). On the other hand, the EU needs to honour its commitments under the United Nations Framework Convention on Climate Change and Paris Agreement.

Table 4. Narrative strategies – *Scope of conflict*

Narrative strategies Scope of Conflict	Total n.	Document											
		EU Reg 2024/1991		Proposal		Imp. Ass		Factsheet_Nature		Factsheet_Biodiversity		Brochure_Nature	
		n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs
'Cost-benefit' analysis	60	4	0,098	9	0,113	36	0,300	2	1	1	0,5	8	0,333
Global Leadership of EU (EU as inspiration for other countries)	12	0	0	4	0,050	5	0,042	1	0,5	0	0	2	0,083

B. Causal Mechanism.

Regarding 'causal mechanisms' (Table 5), the analysis revealed seven kinds of relationships used to link concepts: 'increase', 'potentially increase' (may differ due to uncertainty), 'are essential for', 'limit-protect from', 'potential negative impact on', '(if lacking) negative impact on', 'negative impact on'. The last three, referring to negative impacts, differ in the degree of certainty: in the first case, despite uncertainties, there could be negative impacts; in the second case there is certainty of negative impacts in its absence; in the third, there is certainty of negative impacts regardless of other conditions.

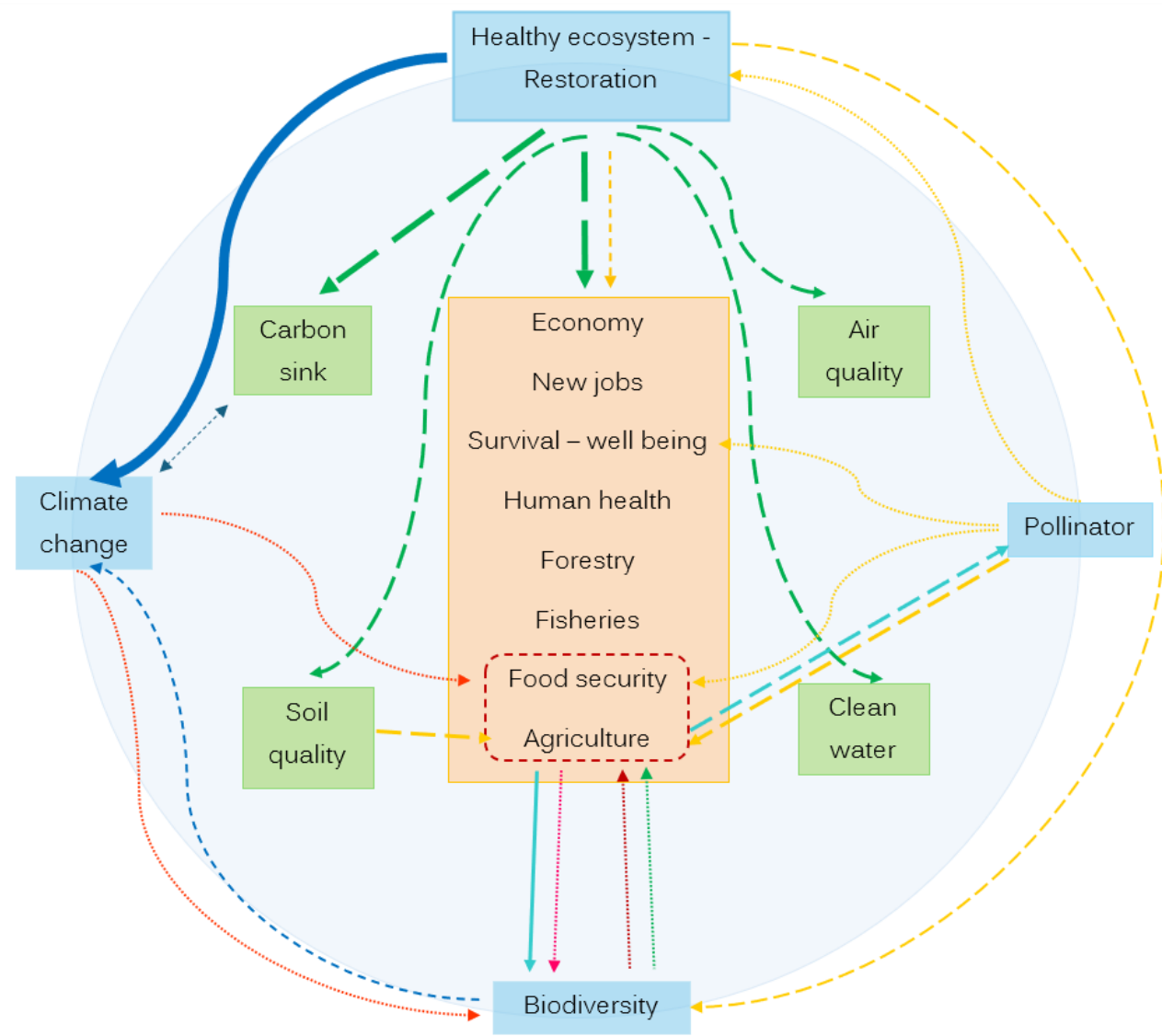
Table 5. Narrative strategies – *Causal mechanism*

Narrative strategies - Causal Mechanism																
Relationship				Total n.	Document											
					EU Reg 2024/1991		Proposal		Imp. Ass.		Factsheet_Nature		Factsheet_Biodiversity		Brochure_Nature	
					n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs	n	n/npgs
Agriculture	potentially increase	Biodiversity	34	12	0,293	15	0,188	3	0,025	0	0	1	0,5	3	0,125	
Agriculture	potentially negative impact	Biodiversity	3	1	0,024	0	0	1	0,008	1	0,5	0	0	0	0	
Agriculture	potentially increase	Pollinator	18	3	0,073	3	0,038	8	0,067	1	0,5	2	1	1	0,042	
Biodiversity	(if lacking) negative impact on	Economy	10	0	0,000	2	0,025	8	0,067	0	0	0	0	0	0	
Biodiversity	increase	Agriculture	6	2	0,049	3	0,038	1	0,008	0	0	0	0	0	0,0	
Biodiversity	limit-protect from	Climate change	10	4	0,098	1	0,013	2	0,017	0	0	1	0,5	2	0,1	
Biodiversity	(if lacking) negative impact on	Human health	1	0	0,000	0	0	1	0,008	0	0	0	0	0	0	
Biodiversity	(if lacking) negative impact on	Agriculture	2	0	0,000	0	0	2	0,017	0	0	0	0	0	0	
Biodiversity	(if lacking) negative impact on	Food security	2	0	0,000	0	0	2	0,017	0	0	0	0	0	0	
Climate change	negative impact on	Food security	2	1	0,024	0	0,000	1	0,008	0	0	0	0	0	0	
Climate change	negative impact on	Biodiversity	18	16	0,390	0	0,000	2	0,017	0	0	0	0	0	0	
Healthy ecosystem - restoration	increase	Carbon sink	28	3	0,073	6	0,075	12	0,100	2	1	0	0	5	0,208	
Healthy ecosystem - restoration	increase	Clean water	18	0	0,000	1	0,013	9	0,075	1	0,5	0	0	7	0,292	
Healthy ecosystem - restoration	limit-protect from	Climate change	86	9	0,220	22	0,275	31	0,258	4	2	3	1,5	17	0,708	
Healthy ecosystem - restoration	increase	Food security	30	5	0,122	7	0,088	10	0,083	3	1,5	2	1	3	0,125	
Healthy ecosystem - restoration	increase	Survival-resilience-well being	37	2	0,049	4	0,050	12	0,100	6	3	0	0	13	0,542	
Healthy ecosystem - restoration	increase	Human health	24	2	0,049	3	0,038	8	0,067	3	1,5	3	1,5	5	0,208	
Healthy ecosystem - restoration	are essential for	Agriculture	9	1	0,024	0	0,000	5	0,042	2	1	1	0,5	0	0,000	
Healthy ecosystem - restoration	are essential for	Fisheries	3	0	0,000	0	0,000	3	0,025	0	0	0	0	0	0,000	
Healthy ecosystem - restoration	are essential for	Forestry	1	0	0,000	0	0,000	1	0,008	0	0	0	0	0	0,000	
Healthy ecosystem - restoration	increase	New jobs	11	2	0,049	4	0,050	4	0,033	0	0	0	0	1	0,042	
Healthy ecosystem - restoration	are essential for	Biodiversity	16	3	0,073	4	0,050	8	0,067	0	0	0	0	1	0,042	
Healthy ecosystem - restoration	increase	Economy	17	3	0,073	4	0,050	8	0,067	0	0	0	0	2	0,083	
Healthy ecosystem - restoration	increase	Soil quality	18	3	0,073	4	0,050	5	0,042	2	1	0	0	4	0,167	
Healthy ecosystem - restoration	increase	Air quality	18	3	0,073	4	0,050	6	0,050	1	0,5	1	0,5	3	0,125	
Pollinator	are essential for	Food security	5	1	0,024	1	0,013	1	0,008	1	0,5	1	0,5	0	0	
Pollinator	are essential for	Survival-resilience-well being	5	1	0,024	1	0,013	3	0,025	0	0	0	0	0	0	
Pollinator	are essential for	Healthy ecosystem - restoration	5	1	0,024	1	0,013	3	0,025	0	0	0	0	0	0	
Pollinator	are essential for	Agriculture	18	3	0,073	3	0,038	8	0,067	1	0,5	2	1	1	0,042	
Soil quality	are essential for	Agriculture	18	2	0,049	3	0,038	7	0,058	0	0	2	1	4	0,167	

Figure 1 highlights the relationships between the main objects in the texts to visualise their use, using arrows that link the themes involved. The thickness of each arrow directly corresponds to the number of occurrences of the relationship it represents; thus, thicker arrows indicate more occurrences. As illustrated in the figure, the diagram reveals which relationships appear most frequently throughout the regulations.

Figure 1. Narrative strategies – cause-and-effect relationships

Legend			
Relationship	Symbol/colour	Number of references	Arrow thickness
Increase		$0 \leq n < 5$	
Potentially increase		$5 \leq n < 10$	
Are essential for		$10 \leq n < 15$	
Limit-protect from		$15 \leq n < 20$	
Potentially negative impact on		$20 \leq n < 25$	
(If lacking) negative impact on		$25 \leq n < 30$	
Negative impact on		$30 \leq n < 40$	
		$n \geq 40$	



In Figure 1, the characteristics, events and environmental approaches are shown in the blue boxes and the activities, human sector characteristics and features in the red boxes. The green boxes represent environmental features externally related to humans; characteristics of the world that humans directly influence.

At first glance, the most commonly used strategy is to restore ecosystems to limit climate change, thereby protecting people from its effects. Although climate change and biodiversity are interlinked⁵⁴ and Article 1 of the Proposal and of the adopted regulation addresses both objectives (climate change and biodiversity loss),⁵⁵ the emphasis on communication is on the former. Restoring ecosystems helps mitigate climate change, particularly

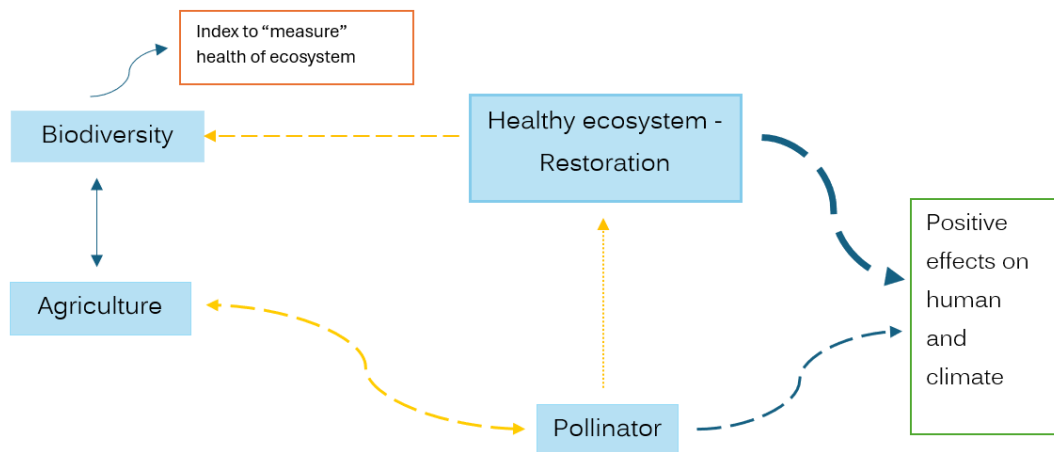
54 Hans-Otto Pörtner et al., ‘Scientific outcome of the IPBES-IPCC co-sponsored workshop on biodiversity and climate change’ (IPBES secretariat, 2021).

55 Article 1 of the original proposal stated: “This Regulation lays down rules to contribute to: (a) the continuous, long-term and sustained recovery of biodiverse and resilient nature across the Union’s land and sea areas through the restoration of ecosystems; (b) achieving the Union’s overarching objectives concerning climate change mitigation and climate change adaptation; (c) meeting the Union’s international commitments.”. Proposal for a Regulation of the European Parliament and of the Council on nature restoration, COM (2022) 304 final. Article 1 of the adopted regulation avoids using the term nature, instead referring to biodiverse ecosystems and it expands the scope to include additional objectives such as food security and land degradation neutrality. It reads: “This Regulation lays down rules to contribute to: (a) the long-term and sustained recovery of biodiverse and resilient ecosystems across the Member States’ land and sea areas through the restoration of degraded ecosystems; (b) achieving the Union’s overarching objectives concerning climate change mitigation, climate change adaptation and land degradation neutrality; (c) enhancing food security; (d) meeting the Union’s international commitments”. Regulation (EU) 2024/1991 of the European Parliament and of the Council of 17 June 2024 on nature restoration, OJ L 2024/1991.

through carbon sequestration. It is essential for the survival and health of humans and their activities.⁵⁶

Another, albeit less pronounced, narrative strategy concerns biodiversity reduction. It is closely linked to the agri–food sector and pollinators in a cyclical relationship (Figure 2). Ecosystem restoration is essential for biodiversity, which is linked to agriculture in an interdependent relationship (agricultural practices can negatively affect and increase biodiversity; similarly, biodiversity can benefit agriculture, while its absence would have negative effects). Pollinators play a crucial role and are essential for both agriculture and ecosystem restoration.

Figure 2. Relationships between biodiversity, agriculture, ecosystem restoration, and pollinator



In this narrative framework, the livestock sector is omitted, apparently overlooked or indirectly referenced in the legislative context, despite

⁵⁶ On ecosystem restoration for climate change mitigation through carbon sequestration, see IPCC, *Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report* (Cambridge University Press 2022); Bronson W Griscom et al, 'Natural Climate Solutions' (2017) 114 *Proceedings of the National Academy of Sciences* 11645. On the essential role of ecosystems for human health and survival, see *Millennium Ecosystem Assessment, Ecosystems and Human Well-being: Synthesis* (Island Press 2005)

discussions on farmland, agriculture, and agroecosystems. Ecosystem restoration includes revitalising land-use systems within traditional cultural landscapes,⁵⁷ highlighting the central role of livestock.⁵⁸ Two critical factors are worth highlighting: livestock's relationship with climate change and impact on human nutrition. The analysis shows that the dominant narrative strategy focuses on the causal relationship between ecosystem restoration and climate change adaptation mitigation. The significant impact of livestock sector was highlighted in 2008.⁵⁹ Therefore, interventions in livestock practices are essential for restoring agroecosystems and effectively mitigating climate change. Livestock affect climate change and have a significant impact on land use, deforestation, and biodiversity loss,⁶⁰ which are interrelated and directly linked to current inefficiencies in livestock practices. Another pivotal perspective is: halving European consumption of animal-based products could potentially reduce agricultural land use by a quarter, allowing natural habitats to regenerate.⁶¹ Reduction in animal-based food consumption is critical to slowing and reversing tropical deforestation,

57 Stefan Zerbe, Gerhard Wiegleb (eds), *Renaturierung von Ökosystemen in Mitteleuropa* (Spektrum Akademischer Verlag 2009).

58 Claire Kremen, Adina M. Merenlender, 'Landscapes That Work for Biodiversity and People' (2018) 362 *Science* eaa06020; Richard Teague, Matt Barnes, 'Grazing Management That Regenerates Ecosystem Function and Grazingland Livelihoods' (2017) 34 *African Journal of Range & Forage Science* 77.

59 Heera Lee et al., 'Implementing Land-Based Mitigation to Achieve the Paris Agreement in Europe Requires Food System Transformation' (2019) 14 *Environmental Research Letters* 104009; Roberto Talenti, 'Revising the European Regulatory Framework for Livestock-Related GHG Emissions - Is the EU Really Advancing Towards Climate Neutrality?' (2022) *Rivista quadrimestrale di diritto dell'ambiente*.

60 Roberto Talenti, 'Rigenerazione Ambientale e Consumi Alimentari: Una Relazione Riconosciuta Nel Quadro Normativo Europeo?' (2023) Vol.2/2023 *Rivista quadrimestrale di diritto dell'ambiente*.

61 Henk Westhoek et al., 'Food Choices, Health and Environment: Effects of Cutting Europe's Meat and Dairy Intake' (2014) 26 *Global Environmental Change* 196.

which is largely driven by imports from the EU and China.⁶² Therefore, this issue extends beyond ecosystem restoration and includes broader environmental and sustainability considerations.

V CONCLUSION

The main objectives of this work were to identify the implicit narratives within the NRL, considering all the legislative processes from its birth and their outputs, to clarify what kind of narratives have been strategically used in communication to legitimise political action, and what kind of approach to environmental issues was brought forward by the EU Commission with this regulation.

This study defined the main narratives (interpreted as beliefs and values) underpinning all written documents connected with European regulation 2024/1991. The analyses revealed that this regulation represents a departure from previous policies imposing legally binding targets and introduces many new domains of environmental protection, but the assumptions and narratives underpinning the regulation remain anchored in a classic managerial perspective. The selection criteria pertaining to this perspective are based on economic cost-benefit analyses, despite the uncertainties mentioned in the text itself due to the complexity of environmental issues. It leaves nature as the fountain of resources essential to the survival of humans, whose task it is to sustainably control and manage it. This is reflected to a greater extent in the version that was ultimately approved: the explicit objective of food security was added, and numerous exceptions and disclaimers were inserted that undermine the enforceability of the law, such as the primacy of the energy sector and military needs for national defence. These modifications exemplify the managerial approach to nature identified in the narrative analysis above, where nature is conceptualised as a hub of

62 Florence Pendrill et al., 'Agricultural and Forestry Trade Drives Large Share of Tropical Deforestation Emissions' (2019) 56 *Global Environmental Change* 1.

resources to be managed and utilised for competing human needs – from food production to energy security and defence requirements. The enduring reference paradigm is that of sustainable development, which has different interpretations.⁶³ The overarching goal is to maintain existing systems and structures in the face of contemporary challenges and integrate urgent needs that threaten the survival of this species.⁶⁴ It is of concern that there appears to be a decline in this integration of environmental issues with a concomitant shift in focus toward greater emphasis on competitiveness. While economic imperatives require a focus on environmental protection,⁶⁵ managerial criteria alone could be limiting and insufficient in dictating the direction of environmental policies. A paradigm shift and a comprehensive rethinking of human–non-human relationships are necessary. Cultural and political environments play a reformatory role in this context.⁶⁶

Future research could explore and define the different narratives evident in the documents and speeches of other stakeholders affected by environmental regulations, extending the analysis beyond the European context to comparative international perspectives. This study may pave the way for more inclusive and shared approaches.

63 Roberto Talenti, 'Justicia Intergeneracional y Desarrollo Sostenible: Al Borde de Los Límites Planetarios' (2023) Anuario internacional CIDOB 2023.

Roberto Talenti, 'Exploring the concept of sustainable development: a non-scientific, growth-oriented, and anthropocentric ontology normalised in international law?' (2024) 16 *European Journal of Legal Studies* 61.

64 Michelle D Lazarus and Silvio Funtowicz, 'Learning Together: Facing the Challenges of Sustainability Transitions by Engaging Uncertainty Tolerance and Post-Normal Science' (2023) 6 *Sustainable Earth Reviews* 18.

65 Lavinia Del Corona, 'Potenzialità e Limiti Della "Prospettiva Dei Diritti Umani" Nel Contenzioso Climatico' (2024) *Politeia*.

66 *ibid*.