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## CETAF Feedback as part of the EU Life Sciences Strategy Consultation Process

The proposed Strategy for European Life Sciences presents an opportunity to position the EU as a global leader in innovation. However, the call for evidence document currently underrepresents the foundational role of ecosystems, biodiversity, as well as taxonomy as fundamental science pillar for research in that realm, in enabling a resilient and sustainable life sciences sector. It treats ecosystems as peripheral, referring only to the protection of ecosystems “where needed”, while understanding and managing living systems in dynamic, data-informed ways are enabling infrastructures of Europe’s life sciences that act as critical innovation drivers and provide a competitive advantage. Biodiversity underpins, among others, medicine discovery, strengthens resilience to zoonotic disease outbreaks and provides critical ecosystem services essential for combined growth in fields such as forestry and agriculture with sustainable use of natural resources. Moreover, framing the green transition as technocentric, focused on biotechnology and industrial innovation, narrows the scope of the strategy and misses the significant potential of nature-based solutions. Ecosystem restoration, rewilding, and other biodiversity-based innovations offer proven benefits for climate adaptation, carbon sequestration and sustainable food systems – areas where life sciences have an important role to play. A more holistic approach would recognize that ecological health and technological advancement are not mutually exclusive but reciprocally reinforcing.

As such, the green and digital transition should be seen as instrumental for scaling up the implementation of biodiversity policies. Efforts to simplify regulation and accelerate innovation could lead to better competitiveness, but they must be balanced with strong safeguards for biodiversity. While regulatory clarity is important, the streamlining of approval processes for new technologies – particularly in areas like synthetic biology or genetically modified organisms – should not come at the expense of thorough ecological risk assessment. Innovation in life sciences must be not only efficient, but also safe, sustainable and informed by a deep scientific and ethical understanding of biodiversity dynamics.

Taxonomic expertise is essential for identifying species, managing invasive organisms, monitoring ecosystems and ensuring biosecurity. Accurate species-level knowledge forms the foundation of research in medicine, agriculture and environmental management. Investment in modern integral taxonomy including genomics, AI-enabled identification tools and digital infrastructure is thus necessary which entails parallel investment efforts in training and equipping professionals to ensure the required research capacity.

Collaboration between regulators and scientific networks such as CETAF (the European organisation of natural sciences collections-based research institutions), and direct linkage to research infrastructures for biodiversity data, as DiSSCo, (the Distributed System of Scientific Collections) would strengthen the EU's capacity in this area and improve the reliability and reproducibility of life sciences research and ensure the strategy draws on the best available expertise across Europe. Aligning the strategy with the EU Biodiversity Strategy for 2030 and the Kunming-Montreal Global Biodiversity Framework is essential. Without concrete commitments and accountability measures, combatting biodiversity loss remains an aspiration rather than a strategic priority.

To secure a truly sustainable and competitive life sciences future, biodiversity and taxonomy should be moved from the margins of EU innovation policy to its centre. The EU has an opportunity to lead globally with the support of biodiversity-focused research communities, by demonstrating that life sciences innovation and biodiversity restoration can go hand in hand, driving prosperity, resilience and sustainability for future generations.

