

**To: Attachés of the Working Party on the Environment and Working Party on Forests**

**Re: EU's New Forest Strategy for 2030 and the upcoming Council Conclusions**

Brussels, 23 September 2021

Dear Madam/Sir,

On behalf of the European Environmental Bureau, I am writing to share our views on the EU's New Forest Strategy for 2030 in light of the Council Conclusions on the Strategy that you are currently negotiating. **We urge you to engage with your agricultural counterparts to push back against the frankly exaggerated and overly negative approach of the Agricultural Ministers and to ensure that the important environmental commitments of the Strategy are fully supported.** This would be best served by having joint Council Conclusions from the agriculture and environment Council formations.

Forests play a crucial role in bending the curve of biodiversity loss and also bring significant potential for climate mitigation and adaptation and for enhancing resilience against climate-induced extreme weather events. The European Commission's proposals in the new EU Forest Strategy for 2030 include encouraging commitments to protect and improve the health and resilience of the EU's forests, such as a focus on strictly protecting old growth and primary forests or shifting to closer to nature forestry. Unfortunately, **the Strategy is too timid in addressing the drivers of forest destruction and biodiversity loss, such as unsustainable bioenergy, and mainly relies on voluntary targets and actions, also due to pressure from Agricultural Ministers and the forest industry ahead of its publication.**

The EU has the competence to act on the protection of forests and the Strategy fully respects the principle of subsidiarity. There is a long history of EU measures supporting certain forest-related activities in coordination with Member States. Art.191 of the Treaty of the Functioning of the European Union (TFEU) provides clear competence for the EU to take environmental protection measures which also provides for competence when the proposed measures also touch upon forestry issues, as clarified by the Court of Justice of the EU in 1999. The Strategy further fully complies with the principle of subsidiarity as set out in Art.5(3) of the Treaty of the European Union (TEU) as the environmental protection objectives cannot be sufficiently achieved at the Member State level alone given the necessary EU-level scale of the actions as well as the heightened effectiveness of addressing the monitoring and protection of forests at the EU level.

The Council now has an opportunity to support and strengthen the commitments in the Strategy for which a strong involvement of Environmental Ministries is key to ensure that the environmental considerations are adequately taken into account in the formulation of the national position on the Forest Strategy.

**We therefore call upon you to work closely with your Agriculture Ministry to push for the full endorsement of the commitments of the EU's new Forest Strategy for 2030 and for the timely implementation of the commitments.** More specifically, we call upon you to:

- **Fully support the commitment for a legislative proposal on EU Forest Observation, Reporting and Data Collection given the importance of adequate monitoring and data availability for effective forest protection measures;**
  - The EU does not have complete information of what is going on across the EU's forests. On average, [13% of wood sources are unaccounted for annually](#), and where countries have information it is often difficult to compare with other

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Member States due to different ways that countries monitor their forests. Beyond wood and carbon, to be able to respond to EU environmental problems, there is a need to better assess the state of forests across Europe by defining common metrics to understand National Forest Inventories (NFIs), which have reporting categories and definitions between countries.

- **Welcome the development of additional indicators and thresholds for sustainable forest management, ensuring that biodiversity needs are fully included in it;**
  - The progress made under Forest Europe is recognised in the Biodiversity Strategy, while also recognising the need to go further in defining benchmarks and thresholds to assess the sustainability of management practices, which is currently not possible at the EU-level. Further work to be able to implement this framework and to determine ecological and social, as opposed to just economic, impacts is a prerequisite for providing financial assistance to improve biodiversity in European forests.
- **Support broader stakeholder consultation in the Standing Forestry Committee;**
  - Fruitful discussions have taken place in the Coordination Group on Biodiversity and Nature (CGBN) sub-working group on Forests and Nature, which includes representatives from Environment and Agriculture Ministries, NGOs and industry representatives. Progress has been made in discussing criteria around closer-to-nature forestry, afforestation and reforestation guidelines as well as definitions for primary and old-growth forests. Full and effective participation in decision-making processes set up under the auspices of the EU Forest Strategy is necessary for furthering common understanding on the most pressing forest issues and to support the implementation of the Forest Strategy.
- **Continue to fully support the work on the definition, mapping and strict protection of old-growth forests.**
  - National Forest Inventories may have differences in how they classify primary and old-growth forests, hence there is a strong need for an evidence-based discussion on [academic definitions](#) that can encompass the realities of such biodiverse forests across Europe. The common definition should be based upon science and can provide a solid prerequisite for the strict protection of all remaining old-growth forests, in line with the commitment of the EU Biodiversity Strategy for 2030.

We would further strongly welcome any public statements of support you are able to make on the above issues and also encourage you to cooperate with your environmental colleagues in other Member States to explore opportunities for joint statements. At the EU-level, we call for a deeper involvement of Environment Ministers in the development of Council Conclusions on the Forest Strategy that go beyond an exchange of views from the Environment Council and instead aims for joint Council Conclusions that ensure consistency between the two formations.

Thank you in advance for taking our above points into consideration and for working towards a strong Council endorsement of the Forest Strategy. Please do not hesitate to reach out to Kelsey Perlman ([kelsey@fern.org](mailto:kelsey@fern.org)) and Laura Hildt ([laura.hildt@eeb.org](mailto:laura.hildt@eeb.org)) should you have any questions about the above or wish to further discuss our recommendations.

Yours sincerely,



Sergiy Moroz, Policy Manager for Water and Biodiversity

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