

To: Agriculture Ministers of EU Member States

Cc: Executive Vice-President for the European Green Deal and Commissioners for Environment, Energy, Industry, Agriculture, Health and Food Safety and the Chair of the European Parliament Environment Committee

**Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 15 November 2021**

Brussels, 3 November 2021

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share with you our views on the Forest Strategy as the main item on the agenda of the forthcoming EU Agriculture and Fisheries Council. I invite you to take our concerns into account during final official level preparations as well as at the meeting itself.

Europe's diverse 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 new EU Forest Strategy for 2030 includes encouraging commitments to protect and improve the health and resilience of the EU's forests. While the Strategy is rather timid in adequately addressing the underlying drivers of forest destruction and biodiversity loss, partially because it mainly relies on voluntary commitments, it is nonetheless an important step towards more sustainably managed and healthier forests. As the Strategy also reiterates commitments that have already been endorsed in the Council Conclusions on the EU's Biodiversity Strategy for 2030, **it is important to ensure a consistent and coherent approach through the endorsement of the EU Forest Strategy for 2030.**

The endorsement of the Forest Strategy is also crucial to not undermine the efforts at global level, including the Forest Pledge just adopted at the UN Climate COP26, and the EU's credibility at global level.

The EU has a strong mandate 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 on the Functioning of the European Union (TFEU) provides clear competence for the EU to take environmental protection measures, also when the proposed measures touch upon forestry issues, as clarified by the Court of Justice of the EU in 1999.<sup>1</sup> The Strategy furthermore 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 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 EU level.

***We therefore call upon the Agriculture and Fisheries Council to:***

- Fully endorse the EU Forest Strategy for 2030 in its entirety and closely collaborate with Environment Ministers and the environment formation of the Council to ensure coherency,

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<sup>1</sup> Court of Justice of the European Union, Judgment of 25 February 1999 in joined cases C-164/97 and C-165/97, para 16.

consistency and an integrated approach to overlapping commitments of the Forest and Biodiversity Strategies;

- Strongly 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;
- Welcome the development of additional indicators and thresholds for sustainable forest management, ensuring that biodiversity needs are fully included in it;
- Support broader stakeholder participation in the Standing Forestry Committee and overall governance of the EU forest and biodiversity policies;
- Continue to fully support the work on the definition, mapping and strict protection of old-growth forests.

These calls are supported by more than 80 NGOs across the EU as expressed in a [joint letter](#).

Thank you in advance for your consideration of these points which support the ambitions of the European Green Deal and will help catalyse progress in meeting the environmental and agricultural challenges facing Europe and the planet. This will respond to scientific evidence and also support EU and national legitimacy in the eyes of a public which broadly supports increased action at EU level to protect the environment.

Yours sincerely,



Jeremy Wates  
Secretary General