

**To:**

*Executive Vice President Frans TIMMERMANS*

**Cc:**

*Executive Vice President Margrethe VESTAGER*

*Executive Vice President Valdis DOMBROVSKIS*

*Commissioner Thierry BRETON*

*Commissioner Ylva JOHANSSON*

*Commissioner Virginijus SINKEVICIUS*

*Commissioner Jutta URPILAINEN*

*Commissioner Janusz WOJCIECHOWSKI*

*Commissioner Kadri SIMSON*

**Subject: The importance of nature restoration targets for EU forests**

Dear Executive Vice President Frans Timmermans,

On behalf of environmental and social justice organisations in Sweden, Finland, Estonia and Europe more broadly, we are writing to stress the importance of restoring forests in the upcoming Nature Restoration Law. This is the only way to successfully fight climate change and biodiversity loss.

The reasons for this are clear: European Forests are a large and crucial ecosystem, covering 40 per cent of European Union (EU) land. But overlogging means that they are more vulnerable to climate change and that their ability to absorb carbon dioxide is deteriorating fast.

The European Environment Agency's (EEA) State of Nature in the EU report (2020) and its forest-related data both show that even forests meant to be protected under the Habitats Directive are in poor condition:

1. Only 14 per cent are in good ecological condition - only 13 per cent of EU forests' conservation status is improving (26 per cent are deteriorating).
2. Boreal forests are in the worst ecological state - only 2 per cent have a favorable conservation status.
3. Five of the six most significant threats to forest habitats are linked to forestry. Removal of dead and dying trees including debris is the most harmful intervention, while clear-cutting is the third most negative intervention.

The recent Intergovernmental Panel on Climate Change (IPCC) Working Group II report highlighted that healthy ecosystems are more resilient to climate change and provide life-critical services. The report states that it is necessary to protect and restore 30-50 per cent of ecosystems to enable them to adapt to ongoing warming.<sup>1</sup> Restoring degraded ecosystems such as forests will also accelerate progress towards sustainable development, and enable them to store and remove carbon from the atmosphere. This is in line with commitments already made in the EU Biodiversity Strategy.

We were therefore stupefied that Finland, Sweden and Estonia's forest industries requested that forest ecosystems be excluded from the new Nature Restoration Law. This would undermine climate targets and commitments in the EU Biodiversity Strategy. Whilst governments and citizens around the world look to solve the biodiversity and climate crises, it seems that the forest industry has only one concern: maintaining access to large quantities of cheap biomass, whatever the cost to forests, communities, nature and the climate.

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1. <https://www.ipcc.ch/report/ar6/wg2/>

As members of civil society from these countries and beyond, we would like to highlight the problematic forestry practices already underway in Finland, Sweden and Estonia. Although they claim to practice Sustainable Forest Management (SFM), there are examples of daily clearcuts that negatively impact biodiversity, soil, nutrient cycles and the climate. These industrialized forestry practices also cause social and economic harm. For example, in 2020, Forest Europe revealed a clear decrease in the forest sector's workforce between 2000 and 2015:

- Estonia 12 per cent decrease
- Finland 31 per cent decrease
- Sweden 25 per cent decrease

These reductions are partly due to mechanisation. In contrast, restoring forest ecosystems and scaling up close to nature forestry practices, thus enhancing ecosystem services (carbon retention, tourism, etc.), would create new job opportunities especially in economically marginal areas where rural depopulation is a serious challenge. **This requires going beyond current indicators** such as increase in tree cover and forest increment, as these are not able to measure whether forests are being properly restored.

The EU must not prioritise short term industry gain over long term ecological, social and economic benefits. EU policies should address the planetary and social crises we face and not fall for unsubstantiated industry claims. We therefore call on you to publish the **Nature Restoration Law** without delay and to **include ambitious restoration targets with clear indicators to improve the ecosystem resilience of our forests in the EU.**

Sincerely,

**The signatory NGOs:**

