To: Agriculture Ministers of EU Member States  
Cc: Executive Vice-President for the European Green Deal and Commissioners for Agriculture and for Environment, and the Chairs of the European Parliament Agriculture and Environment Committees

Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 23 January 2024

Brussels, 18th January 2024

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share with you our views on some of the issues on the agenda of the forthcoming EU Agriculture and Fisheries Council on 23rd January 2024. We have structured the letter according to our understanding of the Council Agenda, mainly focusing on your deliberations within our expertise and priorities. I invite you to take our concerns into account during the final official level preparations, as well as at the meeting itself. I would welcome an opportunity to discuss our input and recommendations in a meeting with you in the margins of the Council meeting on 23rd January 2024.

Policy dialogue on the future of agriculture in Europe

The recently announced Strategic Dialogue on the future of EU agriculture offers a crucial opportunity for food system actors and stakeholders to gather and exchange, building a strong consensus on the transition to healthy and sustainable agri-food systems. In the current context of politically driven and polarising pushback against the all-important commitments made by the Commission under the EU Green Deal, it is absolutely key that the political debate and agenda around food policy remain geared towards achieving social, environmental and economic sustainability across the agri-food system.

EEB therefore calls upon the Agriculture and Fisheries Council to support a Strategic Dialogue that:

• Does not derail or replace work on the proposals announced in the Farm to Fork Strategy, including the legislative framework on Sustainable Food Systems and the revision of the EU animal welfare legislation;
• Keeps a clear focus on the transformation of the food system as a whole, not just looking at the agriculture sector in isolation, in full alignment with the transition process set forth by the Farm to Fork Strategy and the legislative initiatives announced in it;
• Is science-based and as such takes as starting point the scientific consensus on the need to transform the EU's food system to bring it within planetary boundaries;
• Is transparent and inclusive, involving all relevant stakeholders equally and meaningfully.

Regulation on a monitoring framework for resilient European forests

Forests are essential for our health and wellbeing, and the health of the planet. They are rich in biodiversity and are hugely important to tackle climate crisis. We welcome the proposal from the European Commission for a Regulation on a monitoring framework for resilient European forests (Forest Monitoring Law) as we believe it is needed to strengthen forest protection and restoration across the EU as well as to enhance sustainable forest management. Improving the monitoring and effective planning on forests in the EU will certainly help to ensure resilient forest ecosystems.

EEB therefore calls upon the Agriculture and Fisheries Council to:
• Collaborate closely with the Environment Council that should lead the negotiations on this file, since the key element of the proposal is to have a better understanding of the environmental state of Europe's forests for harmonised information across the EU27.

• Make strategic planning mandatory. Sustainability of forestry is achieved through a healthy interaction between environmental, social and economic indicators, hence the added value of strategic planning that needs to be mandatory;

• Recognise the cost-benefit for forested countries of tracking the health of forest ecosystems. Countries with a large forestry sector and existing monitoring systems can benefit from harmonized and remote sensing-based monitoring in a way that reduces the costs for monitoring;

• Ensure data sharing for robust remote sensing. Robust remote sensing relies on exchange of data between Member States and GIS practitioners to use information from ground sampling, destructive sampling and other monitoring measures to put context to what we see in satellite imagery;

• Prioritise a strong participatory process for development of methodologies and analysis of data quality. Encourage the participation of biodiversity experts, use of citizen science and stakeholder consultations to develop and analyse data under the monitoring framework. Data should be made publicly available;

• Identify and measure outcomes that serve the objectives of the European Green Deal and the EU Forest and Biodiversity Strategies, including mapping and protection of primary and old-growth forests and assessing forest resilience against climate change;

• Improve social and economic indicators (including wood traceability) in order inter alia to protect guardians of the forest: Indigenous and local communities fighting environmental crime are at risk of losing their livelihoods and even their lives to identify illegal or destructive logging activities. It is key to track extent, locations, and other useful information regarding illegal forest activities such as hunting and fishing (e.g. protected species), logging & subsequent trade (e.g. from strictly protected areas or degraded forests), etc. to provide support to communities on the front lines;

• Improve systematic monitoring of non-wood resources that are important for the forest-based bioeconomy, including ecotourism: Non-wood products offer a significant value to the economy and rely on resilient forests. There is, however, a need for recognition of the value of regulatory services the resilient forests provide: micro-climate regulation, air purification, protective functions, hydrological regulation (rain capture & generation, filtration, flood control, etc) provision, biodiversity regulating functions, health benefits, etc. These services must be properly valued to accurately reflect the costs borne by forester, citizens and governments of degradation of these ecosystems.

Habitats Directive and Large Carnivore Populations
The European Commission President has recently tabled the proposal for a Council Decision to adapt the protection status of the wolf under the international Bern Convention on the Conservation of European Wildlife and Natural Habitats. However, the in-depth analysis on the status of the wolf in the EU that accompanied the proposal provides no scientific evidence to justify the lowering of the protection status of the wolf. Moreover, in November 2022, the EU rejected the proposal to downgrade the protection status of the wolf under the Bern Convention, arguing the wolf had not reached a favourable conservation status in most EU Member States. There is no evidence that the situation changed since then.

EEB therefore calls upon the Agriculture and Fisheries Council to:

• Support the Environment Council in its deliberations on the file recognising that Environment Council is the sole competent body to lead the negotiations on the Council Decision giving a mandate to the Commission to act towards a Multilateral Environmental Agreement that EU and Member States are a party to;

• Insist that the Environment Council bases its decisions on scientific evidence that the wolf has not reached a favourable conservation status in most EU Member States and lowering the protection status of the wolf is not justified and will be counterproductive for EU's efforts to achieve co-existence with the wolves;

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• Continue to take action to achieve the favourable conservation status of the wolf and its coexistence with socio-economic activities. Use available EU funding opportunities to invest in prevention and compensation measures based on examples of good practice\(^1\).

Thank you in advance for your consideration of these points which will help address the climate, biodiversity and pollution crises in the EU, help drive sustainable agriculture and forestry and give citizens confidence that their leaders are taking decisions based on scientific evidence to create the basis for a better future for them.

Yours sincerely,

Patrick ten Brink,
Secretary General of the European Environmental Bureau

\(^1\) Commission notice Guidance document on the strict protection of animal species of Community interest under the Habitats Directive