



**To:**  
**Deputy Permanent Representatives in the European Union**

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**Member State Representatives in the Council Working Party on Forestry**  
**Member State Representatives in the Council Working Party on Environment**

Brussels, 23 June 2020

**Subject: Forest-based sector stakeholders seeking Member States' decisions ahead of the CGBN sub-working group on Forests and Nature**

Dear Deputy Permanent Representative,

Ahead of the meeting of the Commission's sub-working group on Forests and Nature of the Co-ordination Group for Biodiversity and Nature (CGBN) on 30 June and 1 July 2020, we, the stakeholders of the European forest-based sector, would like to reiterate the need for a balanced approach in all EU policies related to forests.

The Commission's path in implementing the EU Green Deal planned for the period 2020-2021 raises a number of questions and concerns originating from the way forests have been addressed in the EU Biodiversity Strategy for 2030, the announced delay of the new EU Forest Strategy, as well as the recent interpretation provided by European Commission representatives, concerning the question of competence over forests and forestry in the EU.

With the hope of engaging in a necessary discussion and reaching an urgent resolution at the upcoming meeting of the CGBN sub-working group on Forests and Nature, the undersigned stakeholders wish to address the EU Member States (MS) in seeking their guidance and conclusive decisions on the following issues:

**1. Clarification of the question of competence over forestry in the EU**

The EU has many different types of forest ecosystems with a large bio-geo-climatic diversity. For this reason, their management has always been subject to Member States' competence through national or regional legislation. Moreover, for those EU policies which impact forests and fall under shared competences, the principle of subsidiarity applies. Therefore, the recent statements of Commission representatives on competence over forestry create legal uncertainty and risk hampering the formulation of forest policies at Member State level.

As stakeholders, we would very much welcome clear guidance on how Member States (MS) wish to conclude this discussion with the Commission. Our request has become even more important following the publication of the Biodiversity Strategy for 2030 and ahead of substantive discussions on its main forest-related objectives and targets to take place in the CGBN sub-working group on Forests and Nature. We notice that the Commission seems to already be working on the implementation of its Biodiversity Strategy for 2030 without waiting for the responses from the Council and European Parliament.

## **2. Confirmation of the Mandate for the CGBN sub-Working Group: Its scope, timeline and governance**

Ahead of the 2<sup>nd</sup> meeting of this sub-working group, it is essential that Member States fully agree on its mandate and objectives. During the first meeting, the MS, stakeholders and various EU Commission Directorates raised many questions regarding the mandate and the topics. It seems, however, that some of these concerns were not taken into account in the revised version. Furthermore, in light of the publication of the EU Biodiversity Strategy for 2030, the position of the MS is needed so that the sub-working group remains focused on aspects of biodiversity and nature conservation and does not expand to general forest management issues.

## **3. The Future EU Forest Strategy and its content have become an urgent issue**

We are convinced that a robust EU Forest Strategy (EU FS) post-2020 is needed to unlock the full potential of sustainably managed and multifunctional forests, their products, and services, in reaching the objectives of the UN Sustainable Development Goals, the EU Green Deal and the EU recovery plan from COVID-19. The EU FS should remain the main policy tool to integrate European forests, forestry and the forest-based sector into all other policy areas. The Standing Forestry Committee (SFC) is, and should continue to be, the leading committee on all related issues linked to forestry and Sustainable Forest Management (SFM).

We call on EU Member States to actively engage with the Commission and stakeholders, without delay, ahead of the publication of the new EU FS, in order to develop a holistic, multi-dimensional and inclusive Strategy that will ensure an effective coordination of the EU instruments related to forest management (e.g. enhancement of sustainable silvicultural practices, climate change adaptation, biological diversity and genetic resilience, risk management, forest restoration, afforestation and reforestation, forest information, monitoring and reporting, ecosystem services, research, etc.), and will effectively work out comprehensive and holistic forest-relevant input to all other policy areas both inside the EU (e.g. rural development, bio-based circular economy, industrial policy, climate, biological diversity, human health and well-being, taxonomy, timber legality and trade, international forestry agreements, research and development) and where the EU acts internationally (at pan-European and UN levels).

## **4. The forestry targets of the EU Biodiversity Strategy for 2030 must be focused and realistic**

SFM ensures that the conservation of biodiversity is encompassed within management activities. As forest caretakers, we are highly concerned about how the vision of forest management will be further developed at EU level as it would deviate from the commitment to sustainability and multifunctionality. If additional policy instruments are proposed, they must be scientifically sound and based on internationally agreed definitions. We caution that a one-size-fits-all approach is not suitable due to the many forest specificities and heterogeneous conditions existing across Europe.

It is essential to assess the impact of any measurable targets for ecosystems and biodiversity on all three pillars of sustainable development and, specifically, on the adaptation of forests to changing climatic conditions as well as the role of forests in climate change mitigation and the EU's climate neutrality objectives. The introduction of targets for establishing more protected and strictly protected areas will hamper adaptation measures and will decrease the area available for sustainable wood production in the EU and lead to counterproductive climate mitigation processes such as the so-called "harvest leakage effect" (i.e. stricter limitations within the EU resulting in increased imports of non-EU timber with unknown effects on forest ecosystems outside of the EU). While the emphasis should be placed on the enhancement of monitoring and measuring systems, rather than on setting stricter targets, all future targets should be flexible enough to take into consideration the diverse biogeographical, socio-cultural and financial conditions of each Member State, as well as the yet unforeseen effects of climate change.

We believe that the EU Nature Restoration Plan should be built on existing EU nature legislation, which the recent fitness check concluded to be fit for purpose. Before any new legislation is considered in this respect, and in order to better meet biodiversity conservation targets, gaps in the implementation of existing nature legislation on already-designated sites should first be identified. Any new EU-wide restoration action will require a well-defined and clear baseline and must rely on detailed planning and identification of focus areas at Member State level.

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In conclusion, we are convinced that European multifunctional forests and forest-based products are at the core of the EU Green Deal agenda. Sustainable Forest Management fulfils multiple objectives and provides various products and services to society. With its variety of practices adapted to local circumstances, it is best suited to enhance prospects for all ecosystem services that forests can provide, including biodiversity and nature, climate, human health and well-being as well as the bio-based circular economy.

We call on the Member States to shape the future forest-related policies at EU level within realistic, implementable, yet visionary goals, and to ensure that the future EU Forest Strategy and the structures it sets out at EU level serve as the main framework to address all aspects related to forest management, keeping in mind that any future EU policies that impact the sustainable management of the EU's forests will affect the members of our organisations directly as they are, in fact, the ones who will ultimately be required to put them into practice.

Sincerely yours,



Jean-Marc Jossart, Secretary General  
Bioenergy Europe



Jérôme Roche, Secretary-General  
European Organisation of Agricultural, Rural and  
Forestry Contractors (CEETTAR)



Patrizio Antonicoli, Secretary General  
European Confederation of the  
Woodworking Industries (CEI-Bois)



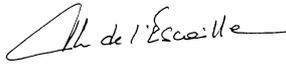
Fanny-Pomme Langue, Secretary-General  
Confederation of European Forest Owners (CEPF)



Jori Ringman, Director General  
Confederation of European Paper  
Industries (CEPI)



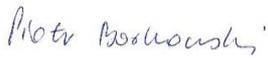
Pekka Pesonen, Secretary-General  
European Farmers and European Agri-  
Cooperatives (Copa and Cogeca)



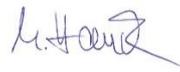
Thierry de l'Escaille, Secretary-General  
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Silvia Melegari, Secretary General  
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Piotr Borkowski, Executive Director  
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