

4th of April, 2022

To:

Executive Vice President Frans TIMMERMANS

Deputy Director General Patrick Childs

WWF Sweden, Swedish Society for Nature Conservation (SSNC), Birdlife Sweden on EU processes and forests

Dear Mr Timmermans and Mr Childs

First let us express our thanks to you for coming to Sweden to consult with stakeholders. We see it as vital that a dialogue and development of policy is transparent, allowing a range of perspectives and opinions to be heard and considered.

Sweden is no different than the rest of the world when it comes to the situation for biodiversity and ecosystems. The 2020 species assessment in Sweden showed that 10 percent of all assessed species are categorized as threatened, primarily due to unsustainable land-use caused by intensive forestry and loss of permanent semi-natural grasslands in the agricultural landscape. Sweden is covered by nearly 70 percent forests, which play an important role in mitigating climate change by absorbing and storing carbon and providing materials that could be used to substitute fossil products.

Combatting the nature and climate crises requires a holistic approach. The European Green Deal has the ambition of targeting these challenges and many more in an integrated way. Removing certain sectors, for instance forestry, on the grounds of the subsidiary principle would thus substantially weaken the ability to reach the goals of the Green Deal.

The state of forests in Sweden is alarming. Even if there has been some positive development since the beginning of 1990s, we still face considerable sustainability challenges such as:

- More than 95% of harvesting operations are performed with clear-cutting
- Inadequate retention in managed forests
- Old-growth forests and other high conservation value forests are being logged on a regular basis
- Intensive forest management such as use of invasive exotic tree species, soil scarification, manipulation of ground water through ditching and fertilization
- Lack of consistent monitoring and evaluation of the environmental performance of forest operations
- Decreased local employment in forest management and industry
- Increased conflicts between forest companies and local communities including Sami villages
- Decreased profitability in forest management and harvesting amongst private forest owners

We conclude that continuing with business-as-usual is not an option, or we will fail in meeting both national objectives and international commitments regarding biodiversity and climate. For instance, Sweden is still failing to fully implement the EU Birds and Habitats Directives.



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Despite concerted efforts over the past decades, the ecological state of Swedish forests is deteriorating. This is further amplified by an industrial demand for forest biomass higher than Swedish forests sustainably can deliver. We also see increasing industry and political expectations for more biofuels from the forest in the wake of the war in Ukraine, something that could have serious negative impacts on biodiversity and the climate. Swedish forests face low resilience in a rapidly changing climate in addition to decreased profitability amongst primary producers. Inevitably this calls for a paradigm shift in forest management, but Swedish forest policy is currently inadequate to take up these challenges. Done wisely, this could be an opportunity for the sector. As you are aware however, the industry and governmental representatives, nationally as well as on EU-level, are strongly opposing any efforts in this direction. This not only risks ecosystem health, but also long-term profitability of the sector and the reputation of Sweden as one of the leading countries on sustainability worldwide.

Transitioning forestry into new management practices based on close to nature forestry is both urgent and necessary. In this regard, we are highly supportive of the ambitions expressed in the new EU forest strategy, and as science-based organizations, WWF, SSNC and Birdlife Sweden, suggest that such a shift should be based on scientific evidence and will most likely require innovation. Claims that such a shift is impossible are not credible. What needs to be addressed, however, are warranted concerns about repercussions on quantity and quality of different forest outputs, profitability for some of the actors in the value-chain, perverse incentives such as subsidies of fossil-based products, and the lack of remuneration mechanisms for the generation of common goods etc.

Specifically, to preserve biodiversity, the multifunctionality and resilience of European forests, our organizations are of the opinion that the EU-policies need to have binding frameworks based on scientific objective evidence that require member states to:

- Strictly protect all primary and old growth forests (OGF)
- Implement close to nature forestry (CNF)
- Restore degraded forest ecosystems, with binding restoration targets for forests integrated in the upcoming Nature Restoration Law
- Create incentives for nature-based solutions to improve biodiversity and protect ecosystem carbon integrity
- Develop reliable and transparent national systems of monitoring, evaluation and reporting of forest biodiversity and health, as foreseen in the new legislative proposal on EU Forest Observation, Reporting and Data Collection
- Carry out transparent multi stakeholder science-based processes when member states address and develop EU policy compliance

Given the above, we welcome a development where the European Commission presents member states with a framework combined with incentives to improve forest protection and forest management through its biodiversity and climate policies. Even though EU's biodiversity- and forest strategy are not binding policies they enable to frame and integrate crucial areas of action including binding policies.



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In addition, biodiverse and resilient forests have the potential to increase net removals of carbon dioxide from the atmosphere for long-term storage. Therefore, the European Commission's proposal to increase the carbon sink in Sweden within the LULUCF directive is welcome. We believe that with a rapid expansion of nature restoration and forestry practices, the European carbon sink can be even higher than the proposed target.

Finally, Europe cannot exchange fossil emissions with biogenic emissions, and we urge the European Commission to end incentives for burning trees for energy in the renewable energy directive (RED). Member States should only be able to subsidize the use of feedstocks that deliver significant, near-term emissions reductions compared to fossil fuels and do not harm biodiversity. We also urge the Commission not to allow any greenwashing in the EU taxonomy. The EU taxonomy should only endorse sustainable activities in line with our demands in this letter.

In conclusion, we encourage the Commission to continue the ambitious path set out in the draft forest strategy and to fully develop the potential of carbon storage by forest ecosystems, based on science. Ecosystems see no national boundaries. We believe that only by addressing the nature and climate crisis holistically will we be able to adequately address these challenges.

With best regards

Peter Westman, deputy CEO, WWF Sweden

Johanna Sandahl, Chair, The Swedish Society for Nature Conservation

Lotta Berg, Chair, Birdlife Sweden

PS Please also find attached recent NGO response on the Nordic forest industry letter to the EU commission promoting the exclusion of forests in a proposed EU restoration law.

