

Brussels, 2 July 2021

Honourable President Von der Leyen,
Executive Vice President Dombrovskis,
Commissioner McGuinness,

We are aware of the leaked version of the upcoming EU Forest Strategy and have familiarised ourselves with it. Although understanding that it is not yet a final version, we find it imperative to point out its shortcomings and to call out the one-sided viewpoint applied urgently.

First of all, the leaked strategy undermines sustainable forest management (SFM) practices and downplays the role of substituting fossil materials by renewable wood-based products. It does not treat the economic, social and environmental aspects and multifunctional role of forests in a balanced manner. Instead, it focuses disproportionately on the environmental side, promotes passive forestry and risks causing unwanted industrial relocation outside of Europe and therefore loss of competitiveness in the EU.

The over-emphasis on protected areas is a short-sided approach, which leaves forests more vulnerable to damages and decreases carbon sinks in the long-term. Healthy forests need to be actively looked after and managed. The leaked strategy does not acknowledge pragmatic integration of nature conservation as part of SFM and therefore increases administrative and financial burdens to forest owners. The leaked text gives other sectors less of an incentive to minimise their emissions and damages the active management of forests, which is crucial for the transition to a circular bio-economy and carbon neutrality.

The definition of SFM has been internationally agreed as part of the pan-European FOREST EUROPE process, which should clearly be acknowledged. We call on the Commission to recognise the holistic approach of sustainability, taking into account equally the economic, social and environmental aspects of the forest-based value chain and ensuring the continuity of the multifunctional and multidimensional role played by forests in achieving green growth and the EU's climate and environmental goals.

The TFEU makes no reference to a common EU forest policy, and the competence on forests lies with the Member States. This was also stated in the Parliament's own initiative report The European Forest Strategy - The Way Forward and in the Council conclusions on the new EU Forest Strategy. It is unacceptable for the Commission to propose a common EU forest policy where it would regulate forest governance, planning, education and management, including specific silvicultural practises such as clear-cutting without a treaty change for which unanimity is needed.

Forests in the EU are characterised by great diversity in aspects from ownership to size, structure, biodiversity, resilience, function and challenges. We disapprove that the leaked strategy does not respect the subsidiarity principle. Forest-related issues can not be solved by one-size-fits-all approach, and they should be addressed at a local level.

The types of products that the forest industry should produce should not be regulated at EU level. Additionally, there is no added value achieved for the cascading principle to be inserted into EU legislation. By aiming to define the products that can be produced, the strategy closes its eyes to different forest conditions, real consumer needs and hinders innovation instead of fostering it and artificially runs down the production of everyday products such as paper and packaging that should afterwards be recycled. The leaked EU Forest Strategy fails to recognise the principle of using all parts of the tree for different products, which is a resource-efficient way to create value and to contribute to the bio-economy following the goals and values of the Green Deal. Stepping up circular bio-economy through viable forest-based industries is essential to achieving a low-carbon society. We call on the Commission to place more focus on innovations, research and development.

The industry has developed globally recognised forest certification schemes over time, which draw from market-based methods. Creating a completely new EU-based scheme risks confusing the markets and consumers, and has a danger of wasting resources on duplicating already existing standards. Instead, forest owners should be encouraged to join the existing schemes.

Additionally, we oppose the fact that the leaked version not only places the strategy in a subordinate position in relation to the Biodiversity Strategy instead of giving it a self-standing and independent role, but it also boldly ignores the clear positions of the co-legislators - the Parliament adopted its position in October 2020, and the Council Conclusions were adopted in November 2020.

We firmly ask you to reconsider the content of the leaked draft on the new EU Forest Strategy before the publication of the final version, in order to align it with the democratically adopted positions of the Parliament and the Council.

Yours sincerely,

Manfred Weber, EPP Group Chairman

Siegfried Mureşan, EPP Group Vice Chairman

Herbert Dorfmann, EPP Co-ordinator, Committee on Agriculture and Rural Development

Petri Sarvamaa, EP Rapporteur for the Report “The European Forest Strategy - the way forward”

Norbert Lins, EP Chair of Committee on Agriculture and Rural Development