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BELGIUM

Joint Letter of Ministers responsible for Forestry of Austria, Czech Republic, Estonia, Finland, Germany, Hungary, Latvia, Poland, Romania and Slovakia on the EU Forest Strategy post-2020

Vienna, 02 July 2021

Dear Executive Vice-President Timmermans,

We are deeply concerned about the draft EU Forest Strategy that is currently circulating. It significantly lacks an understanding of the multi-functional role of forests and the forest-based sector, it ignores the competence of Member States and it ignores the Commissions' own key objective towards Green Growth while **reducing forests primarily to environmental considerations**, and not taking into account socio-economic aspects. **This is unacceptable.**

Based on the EU Treaties, we reiterate that the **responsibility for forests lies with the Member States** and that all forest-related initiatives at EU-level must respect the **principle of subsidiarity and proportionality** as well as the **Member States' competences** in this field.

The strategy needs to be developed in close cooperation with the EU Member States, as laid out in the Commission's Communication on Better Regulation and respecting the principles of good governance. **The Council's Conclusions and the European Parliament's report** on the EU Forest Strategy give **clear political guidelines.**

However, **the Commission did not involve Member States** in the elaboration of the strategy. Neither was there a discussion at the **Standing Forestry Committee** (the main forum for discussing all forest-related issues, ensuring coordination and coherence of forest-related

policies at EU level), nor was any substantial information actively given by the Commission at Council level.

Looking at the current draft, it is clear that the views of principal EU institutions, the European Parliament and the Council, have been largely ignored. Instead, a **technocratic, one-size-fits-all and top-down** approach has been chosen by the Commission.

- **We urge the Commission to respect the competences on forest related matters.**
- **We urge the Commission to follow the Council Conclusions** on the EU Forest Strategy post-2020 that give political guidance for protecting forests and enhancing their resilience and ecosystem services while at the same time ensuring the competitiveness and sustainability of the EU's forest-based sector.
- **The Commission needs to acknowledge the variety of European forests** and the practical aspects of Sustainable Forest Management as well as differences in natural, socio-economic and cultural conditions across Member States.
- We do not see the **multiple functions** of forests and the role of **Sustainable Forest Management, that were in the center of the current strategy**, sufficiently reflected in the overall approach, leading to **major imbalances** within the three pillars of sustainability. The widely and internationally agreed, holistic and dynamic concept of **Sustainable Forest Management** which is largely entrenched in and implemented through national legislations, **must be at the core of the new strategy**.
- The supporting Ministers responsible for Forests **request the Commission to follow the Green Growth agenda and oppose the intention of solely reducing forests to environmental considerations**. We need to acknowledge that already today our sustainably managed European forests make an important contribution, not only to our environmental and climate goals, but **contribute significantly to socio-economic as well as rural development**.
- **We strongly oppose a legislative proposal on EU Forest Planning and Monitoring**. Such a tool would bring **unprecedented administrative burden** to Member States and operators, while the reasoning, purpose and added value remains unknown. We especially reject the Commission's intention to setting EU indicators and thresholds and new forest certification scheme for Sustainable Forest Management and to **regulate in detail individual issues and practices** for all Member States and forest owners and managers.
- Regarding the **bioeconomy**, the draft strategy simply misses the **holistic contribution** that wood products have, to **substitute fossil-based products and fuels as well as its** unique contribution to move to a greener and more circular economy. As such, it fully

overlooks the climatic and socio-economic benefits and the full potential of resource efficiency that forests could have for the bioeconomy.

- In view of the above, we urge the Commission to take into account the **Bratislava Ministerial Declaration** “The Future We Want: The Forests We Need”, **signed by the EU and supported by both Commissioners, Janusz Wojciechowski and Virginijus Sinkevičius**, at the Eighth Forest Europe Ministerial Conference.

The Forest Strategy is supposed to build a coherent framework for both EU forest-related policies and national forest policies of the individual Member States. We expect from the Commission a Strategy that supports Member States’ forest strategies and initiatives as well as the forest-based sector and forest owners and managers to continue delivering the multiple functions our forests provide as prerequisite to contribute to the objectives of the EU Green Deal.

The Commission should rely on the extensive expertise and motivation of Member States, forest owners and forest managers who are committed to Sustainable Forest Management as a well-established, dynamic concept. For centuries, these people/citizens have shaped our traditional cultural landscapes. The strategy should motivate all people working for forests and aim at integrating their experience and knowledge, which is key for safeguarding them in the future.

We urge the Commission to revise the draft and to reflect the views of Member States and the Parliament. In the light of the above-mentioned, postponing the publication of the strategy would give sufficient time to properly involve Member States.

Yours sincerely

