The European Commission is set to release its new forest strategy on 20 July, and the European industrial forestry lobby is pushing hard for it to focus on their narrow short-term financial interests. The undersigned organisations call on the Commission to stand strong and ensure the Strategy signals a shift towards nature protection and action to tackle the climate crisis.

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**European forests are in a dire state**

Increased harvesting and clear cuts mean that Europe’s forests are absorbing 15 per cent less carbon dioxide than they were 20 years ago. And things are getting worse. Healthy biodiverse forests are being replaced by monocultures: an area larger than Greece (14.5 million hectares) is now covered by tree-plantations. If current management practices continue, by 2050 the EU forest sink will be halved.

But it’s not just nature that’s suffering. The extractive forestry industry is harming small businesses and communities, undermining diversified and sustainable rural development and threatening Indigenous Sámi peoples’ livelihoods.

The Forest Strategy could curtail such destruction and even turn it around, but the forest industry lobby seems intent on ensuring that this doesn’t happen.

Following the leak of the draft forest strategy, their fierce lobbying has seen them go as far as arguing that action on forests could fuel anti-EU rhetoric and nationalism!

But in reality, recent polls have shown that European citizens are desperate to see an end to their forests being clear-cut or killed due to mismanagement and the climate crisis.

The lack of transparency over how forest management decisions are made has also spurred controversy and protests in many Member States (see examples below). Time and again the EU has pledged to be climate leaders and yet industrialised forest management is destroying biodiversity and reducing our ability to reach EU and global climate goals.

The Commission therefore needs to shape a forest policy that will work for nature, the climate and communities.

The Forest Strategy is the key opportunity to do this. The Commission could use it to open up EU decision-making on forests so that EU citizens feel more involved. It must place biodiversity at its core, and include clear binding targets to assess progress towards greater sustainability.

To ensure the Forest Strategy helps achieve the EU’s international commitments it should:

- Include new initiatives to end bad industry practices and address the drivers of logging: The Strategy cannot incentivise intensive forest management and increased harvesting in the name of the bio-economy and at the same time achieve climate and biodiversity objectives.
A focus on differentiating harvested wood products will do nothing to solve market failures like allowing green subsidies to encourage harmful forest bioenergy.

- **Set binding targets to restore biodiversity in managed forests with positive incentives for forest owners to deliver on clear ecological benchmarks**: Many certification schemes do not focus on addressing the root of unsustainable practices. They are not strong enough to counterbalance weak forest laws and poor governance, hence the need for binding targets. The Strategy should promote close-to-nature management, not limit biodiversity goals to protected areas.

- **Mandate EU-wide Forest Management Plans with common indicators and reporting standards**: If the EU had comparable information across EU forests they would be able to monitor progress towards forest restoration goals. The EU presently receives a snapshot of degradation in protected areas, but the Strategy should require Member States to send in the wider data that they are already compiling but not yet sharing.

- **Use satellite data to produce annual dashboards on EU forestry**: Expert working groups, including EU Member State representatives are developing criteria on less intensive forest management and mapping and protecting old-growth forests. These could be stronger if informed by frequent monitoring using real-time data and cross-referencing with data from the ground.

- **Create an EU expert group with broad stakeholder representation to discuss EU forest initiatives**: The expert group should include Member State representatives from relevant ministries, civil society, Indigenous Peoples (European and national), academics and forestry actors. There should be an open space for civil society to raise concerns and Member State dialogues to debate EU forest policy.

- **Revise the Renewable Energy Directive (RED) and the Land Use, Land Use Change and Forestry (LULUCF) Regulation**: The Strategy also needs to pay close attention to other EU policies that in its current form have adverse climate and biodiversity impacts. The EU should also consider new legislation to establish EU binding restoration targets.

**On behalf of the undersigned,**

Hannah Mowat, Campaigns Coordinator, Fern
The Forest Strategy must support people, nature and the climate, and not bow to industry pressure.

negative impact on forest species, particularly clear-cutting, therefore have a strong into tree plantations. conversion of natural forest with a long continuity forest species are declining because of the Centre, who state: "Three out of four red-listed the EU: report, the condition of boreal forests is the worst in EU Member States' environmental quality objective shows a negative trend for forests. Based on the EU Member States' report, the condition of boreal forests is the worst in the EU: only 2% is in favourable conservation status! About 2000 forest species are red-listed in Sweden, according to the Swedish Species Information Centre, who state: "Three out of four red-listed forest species are declining because of the conversion of natural forest with a long continuity into tree plantations. Swedish forestry methods, in particular clear-cutting, therefore have a strong negative impact on forest species."

Annex of national examples

In Poland wood extraction is expanding. The volume of harvested wood doubled over the last 3 decades and is predicted to continue increasing. Logging has been encroaching in old growth forests of Bialowieza and the Carpathians. As a consequence, forestry is both the strongest pressure and the biggest threat for Natura 2000 forest habitats in Poland, 28% of which are reported to deteriorate and 48% to be in unfavourable status - well below an already poor EU average. Institutional and civil control of forestry is virtually non-existent. Around 10% of public forests are managed without management plans, millions of cubic meters of wood are harvested without supervision every year. The society has never been so involved in forest conservation issues. 250 anti logging campaigns have been mapped in the whole country, 75% of the society supports the idea of expanding non-intervention zones in Polish forests and 84% wants expansion of the area of Bialowieza National Park. Meanwhile, since 20 years no national parks have been created in Poland. What is more, civil participation in making decisions on management of public forests is virtually non-existent. Decisions approving Forest Management Plans can not be referred to court, contradicting Aarhus convention and EU regulations. Public consultations of management plans are fictional, remarks postulating pro environmental modifications of forest management are virtually always rejected.

In Estonia, citizens are in the streets demanding transparency of government plans to log forests. In Sweden about 39% of the sensitive biologically-important habitats were negatively affected by harvesting during 2014-2017. According to official reporting under the EU Habitats Directive, 14 of 15 forest biotopes in Sweden do not have a favorable conservation status, and the Swedish Forest Agency's annual review of the environmental quality objective shows a negative trend for forests. Based on the EU Member States' report, the condition of boreal forests is the worst in the EU: only 2% is in favourable conservation status! About 2000 forest species are red-listed in Sweden, according to the Swedish Species Information Centre, who state: "Three out of four red-listed forest species are declining because of the conversion of natural forest with a long continuity into tree plantations. Swedish forestry methods, in particular clear-cutting, therefore have a strong negative impact on forest species."

During the past 60 years a total of 70 per cent of the reindeer-lichen, necessary for the survival of the reindeer, is already lost in Sápmi, the land of the indigenous Sámi people. The Sámi people are publicly sounding the alarm, stating that clear-cuts of old-growth forest needs to end. Sápmi (boreal forests) has surpassed its clear-cutting limit.

Historically, forestry has provided important employment opportunities in Sweden, but today the forest products industry equals only 2.2 % of Sweden's GDP.

In Sweden they already log almost 100% of the net annual (accessible i.e outside of the protected areas) biomass growth, regardless, there is a push for an increase in logging and cutting will take place regardless of the tree age. This makes climate change worse, not better. Given today's slow rate of protection and rapid rate of logging in Sweden, virtually all unprotected natural forests will be lost in approximately 9 years - mostly in favour of climate-damaging biofuels and disposable forest products: 80 per cent of the biomass taken out of the ecosystem is turned into bioenergy, biofuels and short-lived products.

In France, forest policy is at the crossroads as the agriculture policy was in 1950-60. In many rural areas, like Burgundy, Dordogne or Massif Central, clear-cutting of semi-natural stands followed by plantation of douglas fir or maritime pine monoculture is modifying the landscape and impoverishing biodiversity. Not only do these practices undermine forest resilience but also it is fuelling strong and growing conflicts with the local population. One common observation we share with the wood and forest industry is that five years ago, almost no citizens care about the forest policy but now, the multiplication of local contestations, a growing debate at the French parliament and a strong interest of french media for these conflicts, is making forest a political issue. The trend to reduce the age of harvesting of trees, the shift from management of complex ecosystem to trees monocultures, the focus on tree planting instead of natural regeneration, and moreover the instrumentalisation of climate change to push this intensification of forestry, the closure of many small and medium sawmill, the huge development of energy uses of wood is creating also a loss of sense for many foresters and wood transformers.

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As the commission draft proposes, we believe placing biodiversity at the core of the EU forest strategy, with clear binding targets, has the power to not only reduce social conflicts, respect our international commitment but also to build a common vision that reconciles citizens and the wood and forest sector.

In Portugal, excluding the Mediterranean forest area of cork oak forest, the timber production area is characterized by clear cuts and the production of low-value goods with rapid release of sequestered carbon (pellets, paper, agglomerates). The use of timber in long-term applications is less representative, although there is potential. Between 1992 and 2018, according to an OECD report, Portugal was the fourth country, the second at the level of the European Union, that recorded the most loss of natural and semi-natural areas. Part of the loss of native forests is due to the conversion to eucalyptus plantations without much control by the State. Portugal has the largest relative area of eucalyptus plantations in the world, with two thirds of them being abandoned and increasingly involved in forest fires. Portugal is, every year, among the three countries of the European Union that registers the largest burnt area, assuming special prominence in the first position, as occurred in 2016, 2017 and 2018.