TO:
CEPF – Confederation of European Forest Owners
Copa-Cogeca – European Farmers and Agri Cooperatives
E.L.O – European Landowners’ Organization
EUSTAFOR – European State Forest Association
FECOF - European Federation of Forest-owning Communities
UEF – Union of European Foresters
USSE – Union of Foresters of Southern Europe.

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Dear Madam, Dear Sir,

On behalf of Commissioner Sinkevičius, I would like to thank you for your email of 11 April 2023 and the recommendations on the Nature Restoration Law. I have shared the document with my staff who are involved in the ongoing negotiations with the Member States in the European Council and with the European Parliament.

The Nature Restoration Law is one of the key priorities under the European Green Deal and the EU Biodiversity Strategy to 2030. The proposal responds to calls, from both Council and Parliament, for an ambitious legislative proposal with legally binding restoration targets for a range of ecosystems, including forests – a proposal that should respond to the biodiversity and climate crisis we are facing.

The proposal is also in line with international commitments such as the Global Biodiversity Framework adopted in Montreal in December 2022, which includes ambitious goals and targets to protect and restore nature. The Nature Restoration Law will be essential to enable Member States to meet the restoration target they committed to in Montreal - but only if we uphold the level of ambition of the NRL.

The Commission proposal gives a large degree of flexibility to Member States to accommodate national specificities in the context of the National Restoration Plans. This means they will also be able to choose the most cost-effective measures and priorities, according to local conditions and practices. The Nature Restoration Law sets targets but does not impose which measures have to be taken, where, or how to restore ecosystems.

The proposal also foresees that stakeholders should be given opportunities to participate in the preparation of National Restoration Plans. In particular, the plans will need to address the potential needs of local communities and specific stakeholder groups, including foresters and landowners.
Regarding your recommendation to be pragmatic on non-deterioration, I can assure you that the “non-deterioration” obligation in our proposal is the most cost-effective approach to increase the share of restored ecosystems in the EU: it would not make sense to invest in the restoration of ecosystems (including with public money) in one place while in other places, we let them deteriorate or even disappear. Non-deterioration is essential to the objectives of the proposal, i.e. to increase the share of restored ecosystems in the EU by 2030 and by 2050. To allow for the necessary flexibility, the proposal includes exceptions, e.g. for projects of overriding public interest or in case of force majeure.

On forest monitoring, the indicators in the Commission’s proposal have been carefully selected for their relevance for biodiversity, but also because for these indicators, established monitoring methods and processes are in place or soon will be. The process of indicator selection was grounded on extensive work carried out over several years as part of work on Mapping and Assessment of Ecosystems and their Services as led by the Commission and the UN System of Environmental and Economic Accounting. Both have been developing methodologies and indicators to assess the condition of all ecosystems.

To cover the financial needs, a range of funding options are available, including EU funding instruments, national sources, as well private financing. As regards the EU level funding, this can come from for example: the Programme for the Environment and Climate Action (LIFE), the European Agricultural Fund for Rural Development (EAFRD), the European Agricultural Guarantee fund (EAGF), the European Regional Development Fund (ERDF), the Cohesion Fund and the Just Transition Fund, as well as Horizon Europe, and the European Solidarity Corps. The Recovery and Resilience Facility (RRF) is a further source of funding for the protection and restoration of biodiversity and ecosystems. In addition, a range of EU, national and private initiatives are available to stimulate private financing, such as the InvestEU Programme, which offers opportunities for public and private blended finance, and carbon farming as a green business model.

We should not only consider the costs, but also the benefits of restoring biodiversity in forests. Forests with high biodiversity are less vulnerable to the effects of climate change and natural disasters such as drought and forest fires. High quality wood-production is compatible with such forests, as demonstrated by approaches such as continuous cover forestry and other close to nature forestry approaches. Science has shown that closer to nature forest management approaches are economically profitable and more sustainable than the more intensive forest management based on even-aged, monospecific forests and clearcutting practices.

Furthermore, forests that are richer in biodiversity and more resilient, provide higher stability in timber production, while also providing a wider range and better quality of ecosystem services beyond timber provision. These other services beyond timber production include for example carbon sequestration, flood control, water purification and recreation. This is where the added value lies: in capitalising on these services beyond timber production alone.
As the key guardians of our land, foresters play a vital role in preserving the EU’s biodiversity. Therefore, it is important to work together to support the adoption and implementation of the Nature Restoration Law and the transition to fully environment-friendly practices, while ensuring that they continue to thrive.

Meanwhile, I remain available for further exchanges.

Yours faithfully,

Humberto DELGADO ROSA