

Open letter to EUSTAFOR

26th March 2026, Győr, Hungary

To: Mr. Juha S. Niemelä, President
Mr. Georg Schöppl, Vice President
Members of the Executive Committee

Cc Mr. Piotr Borkowski, Executive Director

Dear President, Vice President, and Members of EUSTAFOR's Executive Committee,

We are a group of NGOs that share an interest in protecting and restoring the EU's natural forests. We write because we have observed that EUSTAFOR consistently lobbies to undermine EU environmental policies that are crucial for preserving natural heritage in our public forests, and we wish to ask for a change in direction.

EUSTAFOR defines itself as the representative of state forest management organisations in the EU, but its activities do not represent the public interest, nor the opinions of many of the staff it represents. While the European public prioritises preservation and restoration of forest carbon stocks, biodiversity, and forest recreation above harvesting,¹ EUSTAFOR repeatedly lobbies to weaken environmental policies and promote wood provision above other values.

For example, a LinkedIn post² recently reported on EUSTAFOR's efforts to persuade the European Commission to:

1. **Make the Nature Restoration Regulation meaningless for the vast majority of forests**, by applying it solely to areas that are already protected.
2. **Weaken the Birds Directive, so it doesn't "lock-up" the forest sector.**³
3. **Change how the European Environment Agency reports on forest condition, in order to present a rosier picture** – despite having opposed much of the harmonised monitoring the EC tried to introduce in its proposed Forest Monitoring Law (below).

This is just the latest example of damaging lobbying. EUSTAFOR has consistently teamed up with the intensive forestry sector, among other things arguing to:

4. **Delay the EU Deforestation Regulation**⁴ – successfully stopping a law coming into effect that is intended to reduce global deforestation and degradation.

¹ **1)** Ranacher et al (2020). *Public perceptions of forestry and the forest-based bioeconomy in the European Union*.

<https://efi.int/publications-bank/public-perceptions-forestry-and-forest-based-bioeconomy-european-union>, **2)** EFI https://efi.int/forestquestions/q3_en, **3)** Stratton et al. (2024), *Societal Expectations towards and Perceptions of Europe's Forests*. https://eufore.eu/wp-content/uploads/2024/10/EUFORE_D2.1_final_resubmitted-version.pdf

² https://www.linkedin.com/posts/eustafor_today-i-hosted-a-roundtable-with-christophe-activity-7430241598153699329-RaR-/?utm_source=social_share_send&utm_medium=member_desktop_web&rcm=ACoAAAJNKQBIXWYmTud8UD8qlQ2GWgDY1v29_A

³ The reality is that birds are already being willfully harmed. In Finland, there has been an increasing trend of logging during bird nesting season (and this trend is also being observed elsewhere). Pappila (2019), Summer loggings and bird protection: On regulation and derogations. *Rev Eur Comp Int Environ Law* **28**, 210–216, <https://onlinelibrary.wiley.com/doi/10.1111/reel.12271>.

⁴ CEPF, Copa-Cogeca, European Landowners' Organization & EUSTAFOR (2024). Joint Statement | European primary producers are asking for practical solutions and postponement of the EUDR. <https://www.cepf-eu.org/news-media/joint-statement-european-primary-producers-are-asking-practical-solutions-and>

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5. **Prevent mapping the EU's last primary and old-growth forests**, which is a necessary step towards protecting them.⁵ EUSTAFOR considers such mapping “*burdensome, especially for large forest managers*”.⁶
6. **Avoid public forests contributing to EU targets for an increase in protected areas**,⁷ despite public forests constituting 40% of the EU's forests.
7. **Weaken carbon sink targets** in the LULUCF regulation.⁸ EUSTAFOR claims that climate change disturbances make it impossible to meet the targets, when in fact 82% of disturbances are related to logging, and logging is increasing.⁹
8. **Turn the EU Forest Strategy into a forestry strategy**,¹⁰ complaining about the EC's promotion of closer-to-nature forestry.¹¹
9. **Weaken the proposal for an EU Forest Monitoring Law**, arguing against the use of satellite data and against transparency regarding the condition of public forests.¹²

Like many state foresters themselves, state forest organisations should make decisions as caretakers of our common heritage and should promote environmental legislation, not undermine it. EUSTAFOR has previously recognised “*challenges to the license to operate due to a growing lack of acceptance of the harvesting process*”.¹³ As the public increasingly comprehends how the forestry lobby is working against their interests, EUSTAFOR can expect to see increasing pushback.

Ethical principles for managing public forests include the following:

- Public forests are public assets and should thus serve citizens by maintaining a full spectrum of ecosystem services. They should not be managed solely or even predominantly for wood provision.
- Public forests can contribute significantly to the EU Biodiversity Strategy's targets for increasing the extent of protected areas. Public forest organisations should demonstrate leadership in implementing the Nature Restoration Regulation.

⁵ The largest expanse of which, in Sweden, has seen logging rates worse than the Amazon many of which are being logged faster than the Amazon: **1)** Ahlström *et al.* (2022), Widespread Unquantified Conversion of Old Boreal Forests to Plantations. *Earth's Future* vol. 10 Preprint at <https://doi.org/10.1029/2022EF003221>; **2)** Ahlström & Canadell (2024), Sweden has vast 'old growth' forests – but they are being chopped down faster than the Amazon. <https://theconversation.com/sweden-has-vast-old-growth-forests-but-they-are-being-chopped-down-faster-than-the-amazon-218753>

⁶ EUSTAFOR (2024). *Position on the EU Forest Monitoring Framework Regulation*. <https://eustafor.eu/uploads/EUSTAFOR-Position-Paper-on-Forest-Monitoring.pdf>

⁷ EUSTAFOR (2025). *Preserving Forests, Jobs, and Local Economy: EUSTAFOR's Call for Balanced and Sound Land Protection Approaches*. <https://eustafor.eu/position-paper-preserving-forests-jobs-and-local-economy-eustafors-call-for-balanced-and-sound-land-protection-approaches/>

⁸ EUSTAFOR (2025). EUSTAFOR statement on the 2040 Climate Target: Reflections on LULUCF, Forest Sinks, and the Bioeconomy, <https://eustafor.eu/uploads/EUSTAFOR-Statement-on-the-2040-Climate-Target-Reflections-on-LULUCF-Forest-Sinks-and-the-Bioeconomy.pdf>

⁹ **1)** Seidl & Senf (2024), Changes in planned and unplanned canopy openings are linked in Europe's forests. *Nat Commun* 15, <https://www.nature.com/articles/s41467-024-49116-0.pdf>; **2)** Turubanova *et al.* (2023), Tree canopy extent and height change in Europe, 2001–2021, quantified using Landsat data archive. *Remote Sens Environ* 298, <https://www.sciencedirect.com/science/article/pii/S0034425723003486?via%3Dihub>, **3)** https://ec.europa.eu/eurostat/databrowser/view/for_remov__custom_19560004/bookmark/table?lang=en&bookmarkId=711fa676-20aa-41ad-a692-f7c4b1a539db&c=1767716092000

¹⁰ CEPF, COPA-COGECA, ELO, EUSTAFOR, FECOF, UEF, USSE (2026), *European Forest Owners and Managers Statement on the Review of the EU Forest Strategy for 2030*.

¹¹ This, despite EUSTAFOR asking the Commission, in 2020, to develop an “*holistic*” strategy that would “*promote close-to-nature silviculture*”. (EUSTAFOR, East & North Finland, ERIAFF Network & Junda de Castilla y León (2020). *Joint Statement: The New EU Forest Strategy Post-2020: European Forests Are Not Part of the Problem, but Part of the Solution!* https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12674-Forests-new-EU-strategy/F1300695_en)

¹² EUSTAFOR (2024). *Position on the EU Forest Monitoring Framework Regulation*. <https://eustafor.eu/uploads/EUSTAFOR-Position-Paper-on-Forest-Monitoring.pdf>

¹³ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12674-Forests-new-EU-strategy/F1300514_en

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- To help meet EU climate targets, improve forest biodiversity, and boost ecosystem services such as flood mitigation, public forest organisations should aim to increase forest carbon stocks and the proportion of natural forests.
- Information on public forest condition should be transparently available.

EUSTAFOR has a responsibility to represent its members; its members have a responsibility to serve the public good; and the public needs, and increasingly demands, resilient and biodiverse forests. It is very worrying that instead, EUSTAFOR prioritises alliances with large private landowners, the pulp and paper industry and the agro-industry lobby. The undersigned civil society organisations call on EUSTAFOR to stop prioritising the interests of the intensive forestry sector, and instead commit to protecting and restoring natural function and ecosystem integrity in the EU's public forests.

Yours sincerely,



Zoltán Kun, President

Great Lakes and Wetlands Association / Nagy Tavak és Vizes Élőhelyek Szövetsége, Hungary

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On behalf of the following signatories

Agent Green	Romania
Alba Natura Civil Alapítvány	Hungary
Association Workshop for All Beings	Poland
Biofuelwatch	United Kingdom
BirdLife Sverige	Sweden
Comité Schone Lucht	Netherlands
Ei pöytä tulevaisuutta	Finland
European Wilderness Society	Austria
Fern	Belgium
Fertő tó Barátai Egyesület	Hungary
Green Impact ETS	Italy
Green Liberty	Latvia
Hnutí DUHA - Friends of the Earth Czech Republic	Czech Republic
Latvian Fund for Nature	Latvia
Latvian Ornithological Society	Latvia
Leefmilieu	Netherlands
My sme les	Slovakia
Nagy Tavak és Vizes Élőhelyek Szövetsége	Hungary
NOAH Friends of the Earth Denmark	Denmark
Partnership for Policy Integrity	US
Protect the Forest	Sweden
reLife Earth	Greece
ROBIN WOOD	Germany
Save Estonia's Forests (Päästame Eesti Metsad)	Estonia
VIDRA Association / Green Squad	Croatia

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