**THE ENVIRONMENTAL ADVISORY COUNCIL**

Association “Baltic Environmental Forum”, Foundation “Latvian Fund for Nature”, Foundation "Environmental Education Foundation" , World Wide Fund for Nature, Latvian Ornithological Society, The Environmental facts, The Kemeri National Park Foundation, The Environmental Protection Club, The Latvian Fishermen's Association, Association “Latvian lakes”, Association “Green Liberty”, Association “Eco-design Competence Center”,” Association “Lake and Swamp Research Center, Association “Latvian Botanical Society”, Latvian Beekeeping Association, Latvian Waste Management Association, Association „Baltic coast”, Association "Zero Waste Latvia",” Association “Latvian Environmental Management Association., Foundation “Teiči Nature Foundation”.

**Rīga, Peldu street 26/28, LV-1494**

May 17, 2022

**European Commission**

**To:  The President of the European Commission**

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***Support to EU Green Deal concerning forest management in Latvia.***

The Environmental Advisory Council, as the main social partner to the Ministry of Environment Protection and Regional Development of the Republic of Latvia, consisting of 20 national environmental NGOs, representing environmental experts, is writing to you to express our concerns on how timber industry lobby groups use Russia’s war in Ukraine to push for stepping back on Green Deal regarding truly sustainable and multi-functional management of forests.

The current issues with forest management are strikingly apparent in Latvia, as approximately half of our country is covered by forest land. In Latvia, forest fragmentation is increasing[[1]](#footnote-1), rate of tree cover loss is the second highest in Europe[[2]](#footnote-2), forest habitats of EU importance are being logged[[3]](#footnote-3) though none of them is in a favorable conservation status[[4]](#footnote-4), carbon sequestration in forests is decreasing[[5]](#footnote-5), roundwood is being ground into pellets and burned[[6]](#footnote-6). There is also widespread public dissatisfaction with forest management in Latvia. And now the war in Ukraine is used as a pretext to push for even more logging and less protection of our forests.

One of the core problems is that forests are still often seen as “timber gardens” and sustainability of their management is based on the centuries-old concept of sustained-yield forestry. This approach is not in line with the modern definition of sustainable forest management[[7]](#footnote-7), which requires much more than even flow of timber. Furthermore, studies have demonstrated that this approach can lead to losses of forest ecosystem services and multi-functionality even if even timber flow is ensured[[8]](#footnote-8).

The last 20 years have shown that we are not capable of dealing with these issues and ensuring sustainable forest management on a national level. Often this is due to ‘a race to the bottom’ with competitors of timber industry from other countries (including EU). Therefore, we need a strong and ambitious Green Deal. That is why we welcomed the EU Biodiversity Strategy, Forest Strategy and the work on Green Taxonomy, all of which are now under threat of watering down.

It is alarming that the timber industry finds even the bare minimum of strictly protecting 10% of forests unacceptable. This level of protection is in line with recommendations of scientists (coupled with a third of the land area managed as multi-use conservation landscapes)[[9]](#footnote-9) and has already for a long time been included in the FSC Forest management certification standards. The resistance against even this low level of protection is a stark indication of the levels of forest exploitation and how values of nature are being threatened by ‘business as usual’.

Wood has been a traditional source of energy in Latvia and it is likely to be one of the main sources for heating also in the near future. However, the drawbacks of burning wood for energy have been well documented[[10]](#footnote-10)[[11]](#footnote-11)[[12]](#footnote-12)[[13]](#footnote-13). Therefore, the war and the need to stop burning fossil fuels should not be used to promote even more burning of wood. We should rather focus on saving energy and developing solar and wind energy as well as other truly sustainable alternatives.

We know that many forest owners in Latvia are supportive of more sustainable forestry and biodiversity-friendly management. We strongly believe that these forest owners should be supported financially as well as guided towards closer-to-nature forestry practices, and that is the reason why they will benefit from Green Deal.

Therefore, we strongly urge you not to bend under the pressure and to stick to the principles and goals of the Green Deal, EU Biodiversity Strategy and Forest Strategy, which, if well-implemented, will promote truly sustainable forestry, including protection of biodiversity and climate change mitigation and adaptation, for the benefit of the citizens of Europe and to serve as an example for the whole world.

On behalf of twenty legal signatories

of The Environmental Advisory Council of Latvia,

Juris Jātnieks,

The Chairman of the Environmental Advisory Council

1. FOREST EUROPE, 2015: State of Europe’s Forests 2015. [↑](#footnote-ref-1)
2. <https://www.globalforestwatch.org/> [↑](#footnote-ref-2)
3. <https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/main-pressures-and-threats> [↑](#footnote-ref-3)
4. <https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/conservation-status-and-trends> [↑](#footnote-ref-4)
5. <https://unfccc.int/documents/271530> [↑](#footnote-ref-5)
6. <https://www.lsm.lv/raksts/zinas/zinu-analize/vides-aktivisti-cel-trauksmi-rietumvalstis-klimata-merku-varda-dedzina-baltijas-mezus.a391579/> [↑](#footnote-ref-6)
7. <https://www.fao.org/forestry/sfm/en/> [↑](#footnote-ref-7)
8. <https://www.sciencedirect.com/science/article/abs/pii/S1389934117303210> [↑](#footnote-ref-8)
9. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3357798/> [↑](#footnote-ref-9)
10. <https://www.nature.com/articles/s41467-018-06175-4> [↑](#footnote-ref-10)
11. <https://www.euro.who.int/en/publications/abstracts/residential-heating-with-wood-and-coal-health-impacts-and-policy-options-in-europe-and-north-america> [↑](#footnote-ref-11)
12. <https://www.nowpublishers.com/article/Details/JFE-0173> [↑](#footnote-ref-12)
13. <https://elfond.ee/biomassreport> [↑](#footnote-ref-13)