

## **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 Kemeru 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**

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**To the Directorate-General for Environment, Directorate D**

**European Commission**

**1049 Bruxelles/Brussel Belgium,**

**CC:** EC Coordinating spokesperson **Vivian Loonela:** [vivian.loonela@ec.europa.eu](mailto:vivian.loonela@ec.europa.eu) and

The European Commission Representation in Latvia: [comm-rep-latvia@ec.europa.eu](mailto:comm-rep-latvia@ec.europa.eu)

November 17, 2021

### ***On the current official Position of the Republic of Latvia on EU Forest Strategy***

The Environmental Advisory Council, as the main social partner to the Ministry of Environmental Protection and Regional Development of the Republic of Latvia, consisting of 20 elected national environmental NGOs as well as other professional organizations, herewith express its support to the European Union (EU) Forest Strategy and concerns regarding current official Position of the Republic of Latvia about this Strategy.

The EU Forest ecosystems are vitally important to maintain biodiversity, mitigate climate change and ensure people's welfare in EU member states and whole region. However, in many EU member states forest management has been intensive until now and intensity is still growing. As a result, other ecosystems, including the sensitive inland waters, are also even more affected.

Remaining areas of natural forests in the EU are critically small. Outside them, forest management is being conducted in various degree of intensity. In forests ostensibly protected by the EU environmental protection laws and regulations and legal framework of the member states, biological diversity is still declining together with the ability of forests to absorb and store carbon from the atmosphere, as well as provide other crucial services like erosion control, water retention and purification, provision of landscapes and recreation resources.

This situation is evident also in Latvia, having one of the smallest coverages of Natura 2000 areas in the EU, and forest habitats of EU importance are in an unfavorable conservation status according to the Habitats Directive Article 17 report (Report 2013-2019). Nonetheless, forest habitats listed in Annex I of the Habitats Directive are continuously being threatened by timber harvesting in privately as well as State owned forest areas and even within Natura 2000 sites. During the past decade, society in various regions increasingly stressed about the intensity of timber harvesting by clear-felling threatening recreational, natural and other common values.

The volume of timber harvested has reached a highest amount in the past 100 years. At the same time, during the past five years, the forest sector has actively tried to amend the legal framework in order to allow even more intensive harvesting of timber.

The Latvian Environmental Advisory Council believes that the EU Forest Strategy is a step towards sustainable forest management. This can be achieved by implementing it within the framework of the European Green Deal, in close synergy with the EU Biological Diversity Strategy, as well as ensuring the health and resilience of Europe's forests, and adopting strict governance mechanisms and responsibility in EU member states in the implementation of the EU Forest Strategy.

We expect the implementation of the EU Forest Strategy in the member states shall contribute the following objectives:

- facilitate the fastest possible transition to biodiversity-friendly and climate adaptive forest management, e.g., an increase in the volume of dead wood and old trees in forests, provision of mixed-species and multi-aged stands, an increase in the proportion of old-growth forests within the landscape, as well as maintenance of functional transition zones with other ecosystems.

- ensure strengthening and enforcement of a sustainable forest management system, setting regionally specific and environmentally sound definitions and principles of sustainable forestry, assessment criteria, as well as indicators and thresholds related to the health of ecosystems, biological diversity and climate change, which must be included in the future legislation regarding EU forest planning and oversight.

- facilitate the development of compensation and other support systems, including educational and advisory services, for forest owners and managers regarding provision of ecosystem services and the use of EU and national funds for that.

- develop a strict and transparent governance system of forests in EU member states and formation of the EU experts' group with broad representation of stakeholders, including NGOs and civic society, in order to discuss the EU forest initiatives.

- facilitate protection of all primary and old-growth high conservation value forests,

- in forest ecosystems, which are not primary or old-growth forests, facilitate management of 30% of forest area with the priority goal of environmental protection, including strict protection of at least 10% of most valuable forests.

- introduce the principles of landscape ecology in forest management planning.

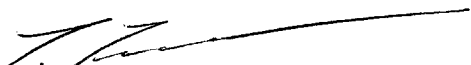
- encourage the provision of legally binding targets and instruments for ecosystem restoration, incorporating clear and measurable goals for forest ecosystem restoration.

- maintain the bio-economic development, not violating the EU climate and biodiversity goals, and does not result in more intensive timber harvesting.

**Based on the scale and dramatic impact of biodiversity loss and climate crisis as well as the failure of traditional forest management practices in solving these problems so far, we would like to stress that environmental NGO of Latvia strongly support the EU Forest Strategy and shall not fully agree with the current official Position of the Republic of Latvia on this Strategy.**

We believe that in the interests of Latvia is to support and implement the EU Forest Strategy for 2030 drawn by the European Commission, and emphasize that the turn towards environmentally friendly, multi-function and sustainable forest management in the European Union is crucially important.

On behalf of the Environmental Advisory Council signatories,

A handwritten signature in black ink, consisting of a series of fluid, connected strokes that form the name 'Juris Jātņieks'.

**Juris Jātņieks,**

Chairman of the Environmental Advisory Council