

Subject: **EUSTAFAFOR Response to the Open Letter of 26 March 2026**

Dear Mr Kun and Signatory Organisations,

We acknowledge the receipt of your open letter<sup>1</sup> regarding the management of Europe's public forests. EUSTAFAFOR and its members appreciate the engagement of civil society in a debate on forests. With this letter, we would like to address specific comments and concerns raised by you and other undersigned organisations.

We carefully reviewed your comments on EUSTAFAFOR's statements. We consider that some of the points seem to have been taken out of context or do not fully reflect our positions. In several instances, your analysis appears to rely on interpretation rather than on a complete consideration of the available information, or on prior clarification with EUSTAFAFOR or its members. For example, regarding satellite data, EUSTAFAFOR, in fact, has supported its use in combination with *in situ* observations, with the aim of improving accuracy and data quality. Similarly, on EUDR, EUSTAFAFOR members remain fully committed and ready to implement this regulation. We believe that a more balanced and comprehensive assessment of the information you have cited would have contributed to a more accurate and constructive assessment.

### Clarifying the Multifunctional Role of State Forests

While the letter focuses primarily on environmental aspects, EUSTAFAFOR members are mandated by their governments to balance and deliver on all three inseparable pillars of Sustainable Forest Management (SFM): ecological, economic, and social. In this regard, it is worth recalling that these mandates are defined by democratically elected governments, reflecting a broad range of societal priorities and public interests. As such, EUSTAFAFOR members operate within policy frameworks established by national legislation in which the SFM dimensions have been accordingly considered and balanced through a democratic decision-making process. This includes:

- **High-quality Stewardship:** EUSTAFAFOR members manage forests for the greater good according to high standards, based on legally required forest management plans that are subject to rigorous scrutiny by relevant state authorities. Furthermore, while not mandatory, state forests are often subject to independent third-party certification systems (e.g., FSC, PEFC) that, if needed, can serve as robust complementary evidence of sustainability.
- **Diverse Services:** State forest organisations implement SFM principles to deliver a full spectrum of benefits, including recreation, nature conservation, carbon sequestration, and the production of biomass essential for the green transition. The non-wood services are offered to European societies through free access to state forests.
- **Shared Responsibility:** A central message of the positions and statement<sup>2</sup> you refer to is that while state forests are committed to all these goals, they cannot be expected to shoulder the full burden

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<sup>1</sup> Zoltan Kun, [Open letter to EUSTAFAFOR](#), 26 March 2026

<sup>2</sup> [EUSTAFAFOR's call for balanced and sound land protection approaches](#), 18 March 2025

of all forest-related targets alone. This is particularly relevant given that state forests constitute only approximately 30% of forests in the EU and around 40% in the pan-European region. On the other hand, the scale of our existing conservation efforts demonstrates our leadership in protecting Europe's natural heritage: Out of 55.5 million hectares managed by our members, over 17 million hectares are protected under national nature conservation laws, and another 11 million hectares are designated as Natura 2000 sites, which state forests remain fully committed to manage with the high professional standards. Approximately 11 million hectares of state forests have been designated as protective forests to prevent soil and wind erosion, protect groundwater sources and surface water flows, various infrastructure, and provide recreation and well-being to all Europeans. We believe that these numbers present an unprecedented scale of state forests' contribution to the political and societal demands of today.

### **Clarification on Implementation Dialogues and Regulatory Practicality**

On the points surrounding the Nature Restoration Regulation (NRR) and the Birds Directive, the reasoning raised in your letter appear to reflect a subjective interpretation of a complex issue. Whilst some Member States are currently drafting their National Restoration Plans (NRPs), EUSTAFOR has highlighted the immense technical and economic challenges of applying Article 4 targets to vast areas outside of the Natura 2000 network. This is not to make the regulation "meaningless," but a necessary discussion step on feasibility. We would also like to point out that Article 12 and its obligations exist to address all forests, also those utilised for forestry operations. For instance, in Finland alone, the estimated annual decrease in forest sector added value due to Article 4 is projected to be between 370 million and 1.8 billion euros<sup>3</sup> - a staggering cost that must be considered alongside other ambitious climate and biodiversity commitments. Financing of NRR is increasingly seen as a critical challenge, with concerns from Member States that the Commission's assessment may underestimate the existing funding gap<sup>4</sup>.

### **Legal Certainty and the Birds Directive**

EUSTAFOR's comments on the Birds Directive "stress test" and subsequent guidance are rooted entirely in the need for legal certainty for forest practitioners. State forests are committed to preserving bird populations, and these considerations are an essential part of the planning and implementation of forestry activities. Our advocacy seeks a framework that protects biodiversity without creating a permanent, across-the-board moratorium on sustainable forestry activities.

### **Addressing Misinterpretations of Technical Positions**

A cursory analysis of your claims suggests that several points have been taken out of context or lack factual grounding:

- a) **Clarification on the EU Deforestation Regulation (EUDR)** – Regarding the claim that EUSTAFOR worked to "stop" the EU Deforestation Regulation, it is important to note that the reference cited is outdated, and both the policy discussions and debates have evolved since<sup>5</sup>. At that time, our

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<sup>3</sup> Metsäbiotalouden Tiedepaneeli report, "[Impacts of habitat restoration on the forest sector](#)", March 2025

<sup>4</sup> Contexte, "[Restauration de la nature: ce que contient le rapport de la Commission sur les financements](#)", 10 March 2026

<sup>5</sup> Joint Statement | [European primary producers are asking for practical solutions and postponement of the EUDR](#), 25 March 2024

primary message, shared by many actors across the sector, was that while fully supporting the objectives of the regulation, the necessary implementation tools, such as the IT systems and benchmarking frameworks, were not yet fit for purpose. The need for additional time to ensure a functional rollout has since proven to be a correct assessment of the technical landscape. Since then, EUSTAFOR members have been working rigorously to ensure full compliance, and they stand ready to implement the regulation today.

- b) Mapping of primary and old-growth forests** – On the assertion that EUSTAFOR seeks to "prevent" the mapping of primary and old-growth forests, the interpretation in your letter is based on a selective reading of a sentence fragment, which results in a misinterpretation of EUSTAFOR's position. The original text of our position specifically addresses technical risks of data duplication and the shift from measurable units to mere localisation. The original text of our position states<sup>6</sup>:

*"There is a risk of increased complexity and duplication of data measurement and reporting if the new system does not respect existing inventory systems. Related to this, two indicators refer to providing localisation instead of a measurable unit (localisation of forest habitats under Natura 2000 and localisation of Old-Growth Forests). Thus, reporting on these two indicators may be burdensome, especially for large forest managers and, even more importantly, would not allow for observation of trends over time."*

- c) Public forests contributing to EU targets for an increase in protected areas** – As regards the claim that EUSTAFOR seeks to avoid public forest contributions to EU protection targets, this is factually incorrect and ignores our extensive previous engagement on this exact topic. We are surprised to see this raised again, as the reference cited is a statement to which your organisations already reacted. We subsequently provided a detailed reply<sup>7</sup> and have since held constructive in-person meetings with some of your colleagues to clarify our position. To reiterate what was shared in our reply and during those exchanges:

*"As noted in our position, state forests already contribute significantly to biodiversity conservation, climate mitigation, and the socio-economic stability of rural regions in proportions which are not represented by any other land use or ownership model. Given that the EU land protection targets apply to the entire land territory - not exclusively to forests - it is neither proportionate nor effective to expect state-owned forests alone to bear the primary responsibility for achieving these objectives. This is the central message of our letter: a call for a more balanced, science-based, and equitable approach to land protection across all ownership types as well as habitat categories."*

- d) Weakening carbon sink targets** – Considering the allegation that EUSTAFOR is using climate disturbances as an excuse to "weaken" carbon sink targets, we must emphasize that EUSTAFOR argues<sup>8</sup> that the issue is considerably more complex than suggested by your letter - considering individual factors in isolation, and that multiple interacting drivers must be considered when assessing forest carbon dynamics. The study<sup>9</sup> you refer to reflects the attribution of canopy openings to planned harvesting versus natural disturbances and therefore describes disturbance

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<sup>6</sup> EUSTAFOR [Position on the EU Forest Monitoring Framework Regulation](#), 27 March 2024

<sup>7</sup> EUSTAFOR [Response to FERN Letter](#), 19 June 2025

<sup>8</sup> EUSTAFOR [Statement on the 2040 Climate Target: Reflections on LULUCF, Forest Sinks, and the Bioeconomy](#), 27 October 2025

<sup>9</sup> Seidl & Senf, [Changes in planned and unplanned canopy openings are linked in Europe's forests](#). Nat Commun 15, 23 May 2024

types rather than serving as a proxy for drivers of forest carbon sink decline. Furthermore, we want to note that no official data suggests that harvesting is a greater threat to forest resilience than climate change. On the contrary, we invite you to consult the latest *State of Europe's Forests* report (2025) by Forest Europe<sup>10</sup>, which confirms:

*"Climate change is a key factor influencing the health, vitality and resilience of Europe's forests. The increasing frequency and intensity of biotic and abiotic disturbances - including compound or cascading events (e.g., drought followed by pest outbreaks) - are posing greater risks of damage and disrupting forest vitality and resilience."*

Maintaining a non-factual narrative that harvesting is the primary problem may unintentionally understate the role of these broader and interacting drivers, particularly the impacts of climate change, which require urgent and comprehensive attention. In addition, the characterization of increasing logging ignores the most recent data. While utilization rates reached a high point in 2020 (92%), the latest Eurostat figures for 2022 and FRA 2025 (FAOSTAT) data show that this peak has passed, and wood removals are declining. As the report clarifies:

*"The harvest/increment ratio is decreasing again... utilization of increment is mostly below 100%. Therefore, EU forests continue to accumulate standing volume overall and remain clearly within sustainable limits."*

In Central Europe specifically, our members continue to grapple with the actual drivers of instability: droughts, major storms, and bark beetle outbreaks. Our position on LULUCF targets is based on this reality - that climate-driven disturbances make static, top-down targets increasingly difficult to guarantee, despite our continued commitment to sustainable harvest levels.

- e) **The EU Forest Strategy** – Regarding the argument that EUSTAFOR attempts to "turn the EU Forest Strategy into a forestry strategy" or is "complaining" about closer-to-nature forestry, we wish to clarify that our position is based on the need for a unified, rather than a fragmented, approach to forest land use governance.

As stated in our official position<sup>11</sup>:

*"Another challenge the EUFS [EU Forest Strategy] brings is related to the concept of "sustainable forest management" and how it has been framed as not sufficient to meet today's challenges. Originally developed and endorsed by European governments at the pan-European level (FOREST EUROPE), the consensual approach has been disregarded, and instead, the new "closer-to-nature forestry practices" concept was established by the EC. This dichotomous approach cannot result in success when it comes to addressing the complexity of forest management."*

Our concern is not with the practices themselves, but with the disregard for the long-standing, scientifically backed, and government-endorsed framework of Sustainable Forest Management (SFM). We believe that introducing a new, separate concept (closer-to-nature forestry) creates an unnecessary and counterproductive dichotomy. Addressing the climate and biodiversity crises

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<sup>10</sup> Forest Europe, [State of Europe's Forests 2025](#), 27 March 2026

<sup>11</sup> CEPF, COPA-COGECA, ELO, EUSTAFOR, FECOF, UEF, USSE, [European Forest Owners and Managers Statement on the Review of the EU Forest Strategy for 2030](#), 19 September 2022

requires a holistic approach that builds upon existing international consensus rather than abandoning it in favour of oversimplified or uncoordinated new definitions.

- f) EU Forest Monitoring Law and Satellite Data** –Concerning your view that EUSTAfor has "weakened" the proposal for an EU Forest Monitoring Law or argued against transparency and the use of satellite data, this is a complete mischaracterization of our position. On the contrary, EUSTAfor has explicitly welcomed an EU role in this area. As stated in our official position<sup>12</sup>:

*"EUSTAfor welcomes an EU role in facilitating the development of innovative forest monitoring systems, both financially and technically. However, the new provisions should not overcome the role of governments in forest policy strategic planning and implementation. Instead, the new instrument should promote and facilitate the cooperation among Member States... with an aim to ensure a holistic approach to forest land use in moving towards EU 2050 climate neutrality ambition. Similarly, data ownership and management ought to be precisely determined, especially as the data collected via satellites will require verification in the field."*

Our stance is not an argument against satellite technology, but an argument for data quality and accuracy. We believe that satellite data is a powerful tool, but it must be integrated with ground-level (*in situ*) verification to be reliable.

- g) Regarding our willingness to be transparent about the state of Europe's public forests** – EUSTAfor has always advocated for a harmonized EU forest monitoring system. To quote the conclusion of the position<sup>13</sup> that you referred to:

*"EUSTAfor sees good reasons for re- establishment of an EU-level forest monitoring to ensure accurate, digitalized, consistent, comparable, timely and accessible data on the state of EU forests, provided that it is well governed by Member States and the Commission together and supported by a wide group of stakeholders of the entire value chain. Such a system must be developed with full respect to the ownership of information, data sensitivity and the need to satisfy societal needs for forest-related information."*

One thing EUSTAfor has been cautious about is the disclosure of locations of the permanent monitoring plots:

*"EUSTAfor advises a cautious approach to forest monitoring data disclosure, including sharing of the locations of permanent monitoring plots. To guarantee the scientific integrity of the latter, it is important that this information is solely available to the institutions competent in the NFIs."*

EUSTAfor's members, not to be confused with the institutions responsible for National Forest Inventories, strive to be transparent about the state of the forests, as well as their own activities. Most of our members publish annual reports with these figures that are available for public access.

Finally, we wish to address your closing remarks regarding the "ethical principles" for managing public forests. EUSTAfor and its members are fully aware of their responsibility to serve the public good.

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<sup>12</sup> EUSTAfor [Position on the EU Forest Monitoring Framework Regulation](#), 27 March 2024

<sup>13</sup> EUSTAfor [Position on the EU Forest Monitoring Framework Regulation](#), 27 March 2024



However, it is important to emphasize once again that the European state forest management organisations are mandated to deliver a vast array of benefits to society that extends far beyond any single interest.

Public forests provide clean air, water filtration, and essential recreation areas for millions of citizens. Simultaneously, they support rural employment, provide the raw materials necessary for a sustainable circular bioeconomy, and provide significant economic input, which is often used for nature conservation and biodiversity. Our mandate is rooted in the fact that state forests cannot serve only one purpose. Sustainable Forest Management is, by definition, the art of balancing these competing needs to ensure the long-term health and productivity of the forest. This mandate has been successfully implemented across the continent for the benefit of the broad public.

We hope that our letter provides sufficient clarification on the points presented in your letter. EUSTAFOR members remain firmly committed to the mission the European governments have entrusted them with, i.e. to manage Europe's state forests according to the principles of sustainability, ensuring they remain resilient, multifunctional, and biodiverse for generations to come. The representatives of environmental non-governmental organisations are always welcome to present their views either through direct contact or at our public events. EUSTAFOR office in Brussels also remains open as a place for a constructive dialogue.

Sincerely yours,

Juha S. Niemelä, President

Georg Schöppl, Vice-President

on behalf of EUSTAFOR's Executive Committee

Brussels, 15 April 2026.