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DIRECTORATE-GENERAL
ENVIRONMENT
Directorate D – Biodiversity
The Director

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Subject: Your open letter on the Green Deal

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Dear Mr Rosenstatter,

On behalf of Commission President von der Leyen, I would like to thank you for your letter of 14 February on the Green Deal. She asked me to reply on her behalf.

We very much welcome your broad support to the overall objectives of the European Green Deal, our transformative agenda for the EU to become a modern and competitive economy that is resilient to external shocks and that enables people to live in a fair and prosperous life in a healthy environment.

Under the Green Deal, forests are at the heart of the EU Biodiversity Strategy¹ as reflected in the EU Forest Strategy⁽²⁾ and other proposals. The Forest Strategy promotes the forest-based bioeconomy hand in hand with achieving the protection targets for EU forests, preserving carbon stocks while increasing EU carbon sinks, enhancing forest resilience and disaster risk prevention and maximising the provision of multiple forest services to society.

Deforestation and forest degradation are among the main drivers of climate change and biodiversity loss, the two key environmental challenges of our time. The EU Regulation on Deforestation and forest degradation⁽³⁾ aims to eliminate deforestation driven by the EU consumption and production of certain agricultural and industrial commodities and will apply even-handedly to commodities produced inside or outside the EU. We see encouraging signs of steps in all sectors and in many countries of alignment with EUDR requirements, and intensive work is ongoing everywhere including enhanced support

⁽¹⁾ [COM\(2020\) 380 final](#)

⁽²⁾ [COM\(2021\) 572 final](#)

⁽³⁾ [OJ L 150, 9.6.2023, p. 206–247](#)

from the EU and its Member States. We should now focus on getting everyone ready and use the nine months that remain in the best possible way.

The EU's ecosystems, notably forests, are confronted with negative trends. The EU carbon sinks are declining and natural ecosystems are in bad conservation status. To reach the binding climate neutrality objective by 2050, we absolutely need to reverse these trends: climate neutrality will not be possible without a substantial increase of carbon sinks, to remove greenhouse gases emissions from hard-to-abate sectors (e.g. cement, steel, aviation, maritime transport, agriculture). Austrian carbon sinks are also following a declining trend in the last years ⁽⁴⁾. Scientific evidence indicates that one of the reasons of those European negative trends are the increasing socio-economic pressures on (forest) biomass, including for energy use.

The Renewable Energy Directive (RED) is a key tool to ensure that the European Union meets the new energy challenges, in respect of its international commitments, while ensuring consistency with the need to promote healthy and biodiverse ecosystems. Bioenergy, which represents ca. 60% of our renewable energy consumption, will continue to play a key role to reach our energy, climate and environmental targets, but only if biomass is sourced sustainably.

Therefore, the recent revision of the RED aims to support the shift towards clean energy sources while maintaining checks and balances to ensure sustainability and future proofing of investments in renewables. In the case of forest biomass, the RED reinforces its sustainability criteria for energy use. It further includes an obligation on Member States to apply the cascading principle with a focus on their support schemes – whereby woody biomass, if subsidized, must be used where it has the highest economic and environmental added value. The revised RED also includes provisions to minimise harmful practices (like large clear-cuts or the conversion of forests into plantations) and to ensure the consistency between renewable energy production and carbon removal targets.

The transposition deadline of the revised RED is set on 21 May 2025. By then, Member States will have to transpose the rules into national legislation. The Commission currently holds discussions with the Member States with the aim to exchange information and support them in the implementation of the revised Directive.

With respect to the Taxonomy Regulation, criteria for classifying a number of different forestry activities as environmentally sustainable ('green') are set out in the Climate Delegated Act ((EU) 2021/2139) of the Taxonomy Regulation. The nuclear and gas activities addressed by the complementary Delegated Act ((EU) 2022/1214) are classed as 'transitional' activities and are subject to demanding conditions and safeguards including strict 'do no significant harm' criteria.

The role of forest owners is crucial in providing necessary renewable raw materials to operators in the forest-based value chain and the wider economy. Their contribution is equally crucial for the growth of carbon sinks and stocks and halting biodiversity loss in forests. Multifunctionality brings opportunities but also demands to consider more than the maximisation of wood production. The Bioeconomy strategy ⁽⁵⁾ supports the circular and sustainable bioeconomy, and highlights that the bioeconomy contributes to several EU priorities, including climate action, the modernisation of the industrial base, and

⁽⁴⁾ <https://climate-energy.eea.europa.eu/topics/climate-change-mitigation/land-and-forests/data>

⁽⁵⁾ [COM\(2018\) 673 final](#)

biodiversity. Again, this requires that forests' extent and condition are at least maintained, and even restored. Science shows that more biodiverse forests are more multifunctional, productive and deliver more ecosystem services, as those needed for climate mitigation and adaptation.

All EU legislation is based on quality checked and detailed impact assessments that analyse the expected economic, social and environmental impacts of the different policy options, including the consideration of cumulative effects. A particular focus in this process is given to assessing the administrative and regulatory burden for the industry and public administrations to reduce it as much as possible. These impact assessments include public consultations, open to all citizens and organisations. For example, almost 1.2 million citizens and organisations reacted to the EU Deforestation Regulation's public consultation, and ca. 40,000 to the Renewable Energy Directive revision.

The Commission services remain open to listen to any feedback on the impacts of its policies and policy instruments. The Commission's high-level Dialogue with Stakeholders in the Forest Sector earlier this year was a key opportunity to exchange views on the best ways forward in unlocking the potential of the forest-based sector.

Yours faithfully,

Humberto DELGADO ROSA