



Romina Pourmokhtari
Minister for Climate and the Environment
The Government Offices
SE-103 33 Stockholm
Sweden

Brussels, 20 December 2022

Subject: BirdLife Europe and BirdLife Sweden priorities for the Swedish Presidency of the Council of the EU

Dear Minister,

In the light of the upcoming presidency of Sweden in the Council of the EU, BirdLife Europe and its Swedish Partner, BirdLife Sweden, would like to share our priorities in the area of environment and climate with focus on biodiversity, which is at the heart of our work.

Building on the momentum from the just concluded COP15 of the Convention for Biological Diversity (CBD) and with the Commission's proposal for the Nature Restoration Regulation in the co-decision process, the Swedish Presidency is well placed to make significant progress in the area of biodiversity conservation in the EU. The priorities for the Swedish Presidency for the Environment rightly highlight that the ongoing climate crisis and biodiversity loss are existential problems that must be resolved together. According to science, large-scale nature restoration is one of the vital solutions that help to reverse biodiversity decline and improve our resilience against climate change impacts. Nature restoration can also give a significant contribution to climate mitigation by turning carbon sources into sinks. Also citizens (98% in Sweden, 95% in EU28) agree that looking after nature is essential in tackling climate change.¹ In addition, the scope and robustness of the EU Framework for the monitoring of forests and strategic plans and the EU framework for certification of carbon removals, that will be also discussed under the Swedish Presidency, will be critical both from a climate and biodiversity perspective.

NATURE RESTORATION REGULATION

The publication of the Commission's proposal for the Nature Restoration Regulation in June 2022 represents a huge milestone and is a true opportunity to put the EU's degraded ecosystems on a path to recovery. Building on the progress made by the Czech Presidency, Sweden will have a critical role in keeping the positive tone of the negotiations in the Council. The Commission's proposal should be seen as a starting point, which Member States need to endorse. To unlock the full potential of the law, and in the light of the urgency and the crucial turning point that this decade provides, the proposal needs to be strengthened in the following ways:

¹ [Eurobarometer: Attitudes of Europeans towards Biodiversity. 2019](#)

- The overarching objective, to put in place effective and area-based restoration measures on at least 20% of the EU's land and at least 20% of the EU's sea area by 2030, must be strengthened by ensuring that all Member States contribute in a fair and accountable way. This will ensure a level playing field where all countries contribute equally and will enhance flexibility for Member States.
- The timeline to reach 100% of the restoration measures needs to be brought forward to be in line with the above-mentioned urgency. It takes time for all the benefits of nature restoration measures to fully materialise and action therefore needs to be taken earlier, by 2040 the latest, in order for nature restoration to contribute to the 2050 climate neutrality targets.
- The proposal must be made implementable also in the marine environment by introducing a mechanism harmonizing it with the Common Fisheries Policy (CFP), in particular to clarify and strengthen its articulation with the development of Joint Recommendations (article 11 CFP). Under the current text, uncooperative Member States could prevent vital restoration work in neighboring countries, a problem Sweden itself has already encountered. Clear time limits for adoption of Joint Recommendations for the purpose of marine restoration, and a possibility for Member States to proceed unilaterally in the face of obstructive behaviour, are crucial.
- To ensure effective implementation of the Regulation, the legal proposal should open the path to explore and establish dedicated funding for nature restoration pursuant to the mid-term review of the Multiannual Financial Framework.

EU FRAMEWORK FOR FOREST MONITORING AND STRATEGIC PLANS

Robust, harmonized, timely and reliable data on the status and trends of forests are critical for their conservation and management. The proposal for the EU Framework for forest monitoring and strategic plans, to be revealed under the Swedish Presidency by the Commission has a potential to provide a necessary legal basis for the EU-wide forest monitoring system, that would replace current patchy and not harmonized national systems, without overriding national competences for forest management. Next to the information related to wood production, the new system must provide information on the health of forests (including impacts of climate change), forest biodiversity, other ecosystem services, forest carbon stocks and flows. The forest monitoring framework should have clear links with EU Biodiversity strategy, EU Forest strategy, upcoming Nature Restoration Regulation, reporting under Article 17 of Habitats Directive and other EU wide processes where forest data are needed. It is important that appropriate data are comparable across the EU, collected at least annually and provided in a timely manner and with a high level of granularity. This should be of specific interest to the Swedish forest industry and land-owner organizations, which often argue for an equal reporting system for forests and protected areas. Modern information technologies should be used to provide easy access to the data which should be open, except for sensitive data.

We welcome Sweden's intention to organize a ministerial workshop on this issue, as it could provide an effective platform for gathering views from scientists and other stakeholders and inform the inter-

institutional negotiations on the future EU Framework. We would be happy to contribute to the event with BirdLife's expertise on forest monitoring and conservation, should that fit the event programme.

EU FRAMEWORK FOR CERTIFICATION OF CARBON REMOVALS

At the end of November, the Commission adopted a proposal for a first EU-wide voluntary framework to certify carbon removals with the aim to contribute to the EU's climate, environmental and zero-pollution goals. If this framework is to truly contribute to the stated goals, the co-legislators, including the Council lead by the Swedish Presidency must improve the proposal on several fronts:

- There should be clear hierarchy for dealing with GHG emissions: Avoid -> Reduce -> Remove
- Carbon offsetting should not be realized in voluntary carbon markets as such a system makes a significant contribution to delaying the actual avoidance and reduction of emissions and raises significant risks, for example of land grabs.
- Carbon removals cannot compensate for emission reduction, especially for industrial livestock, and it should be clearly forbidden to reward emission reductions in agriculture with money intended to finance carbon removals.
- Biodiversity protection and restoration needs to be firmly anchored in the certification framework.

Dear Minister, we would be very happy to offer our support to you and your colleagues during this challenging period and work with you towards progress in the above-mentioned areas. The BirdLife Partnership in Europe has a representative in each EU member state and beyond. Hence through BirdLife Sweden, our network, or directly with our regional office in Brussels, you can always count on us.

Yours faithfully,



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