

- Der Präsident -

- Der Vorsitzende -

Claudia Olazabal
Head of Unit
Directorate General Environment, Directorate D.1
European Commission
1049 Bruxelles/Brüssel
Belgien

Berlin, 27. Oktober 2021

Dear Ms Olazabal,

Thank you for your letter of October 2021 in which you lay out the goals of the EU Forest Strategy.

We expressly welcome the fact that in your letter you emphasise that fundamental rights and the subsidiarity principle have been given consideration. From the point of view of private forest owners both aspects are of great significance: sustainable management of multifunctional forests are only possible if the rights and interests of the owners are strengthened and the diverse structures of forests in the EU are respected.

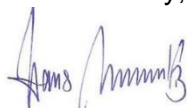
You also mention that the EU forest strategy is not intended to result in a leakage of the production of forestry products to countries outside the EU. However, this is precisely the danger we see in other strategies and initiatives within the EU Green Deal.

The renowned Thünen Institute, for instance, found in a recent study that the EU biodiversity strategy will lead to a decrease in timber production and to leakage effects ([Thünen Working Paper 159a](#)). The findings of the study are clear: it comes to the conclusion that implementing additional protection measures in the EU would further increase the discrepancy between EU protection measures and protection measures in non-EU countries. The reason is that in non-EU countries there is more net deforestation, smaller proportions of forest areas are placed under protection, and less money is spent on the conservation of biodiversity than in EU countries. The goal to enhance biodiversity globally would thus be thwarted. Furthermore, the effect on climate protection would be detrimental as the use of regional timber would decrease in Europe and be replaced by imported timber.

We therefore would like to ask you how, in the framework of the various strategies and projects of the EU Green Deal, the EU Commission intends to prevent leakage effects that lead to a weakening of domestic agriculture and forestry without contributing to our climate and biodiversity goals.

We look forward to receiving your response.

Yours sincerely,



Hans-Georg v. der Marwitz



Max Freiherr von Elverfeldt