

Stockholm Declaration

European Landowners and Managers call on the EU to rethink the Nature Restoration Regulation [COM (2022) 304 final] and Sustainable Use of Plant Protection Regulation [COM (2022) 305 final].

We, landowners and managers of farmland and forests from across Europe, are the custodians of our rural land and natural resources, and we are at the forefront of the effects of climate change. Therefore, we fully subscribe to the goals of climate neutrality and the safeguarding of ecosystems. As a daily activity, we aim to combine the production of food, timber and other resources in a sustainable way, with the protection of our environment, and with our responsibility as employers and entrepreneurs in rural areas.

Against this backdrop, we consider the proposals for the EU Nature Restoration Law and the Sustainable Use Regulation, in their current form, as impractical and hard to understand in relation to the aims of carbon neutrality and green growth proposed by the EU Green Deal. **Specifically, we believe that the EU Nature Restoration Law and the Sustainable Use Regulation does:**

.... not offer adequate solutions to the irreversible changes caused by climate change

Climate change is changing our ecosystems and challenges how we manage our natural resources. If we only keep restoring to the situation of decades ago, at least the last 70 years as mentioned in the proposal, we will actively contribute to biodiversity loss. Resilient ecosystems imply that we adapt to the new normal, to the more frequent extreme weather events that bring uncertainty and difficulties that we are not yet totally measuring. If we are serious about having healthy ecosystems, we need to move beyond protection and restoration alone and focus on adaptation and resilience.

... imperil rural businesses and weaken competitiveness

Landowners and managers are important employers in rural areas. In Europe, 9.2 million jobs are provided by agriculture and half a million people are employed in forestry and logging activities (2018)¹. Similarly, many regional supply chains depend on our ability to manage our land for sustainable production. Through its restrictions, the Nature Restoration Law and the Sustainable Use Regulation threaten our businesses and therefore millions of jobs in rural areas.

...leaves unresolved financing issues

The nature restoration proposal, in particular, leaves unanswered the question of financing. Without adequate compensation and incentives, the measures will have an immediate negative impact on land managers, as the real costs surpass the potential benefits. To ensure long-term fair financial compensation, voluntary contract-based schemes are needed, together with the proper valuation of ecosystem services.

...disregard Europe's diverse landscapes

Considering the heterogeneity of European landscapes, we need more bottom-up approaches instead of a European "one size fits all" solution. Both files pretend to establish a master plan for nature in Europe where there is none. It is important that both principles of subsidiarity and

¹ Agriculture, forestry and fishery statistics- 2020 edition Eurostat

proportionality are respected.

... compromise food and energy security

In our view, it is a fundamental mistake simply to restrict European production of food and renewable raw materials. We need to reduce food waste and the emissions intensity of food produced, as well as address the questions of diet. Production restrictions applied on their own jeopardise European security of supply in a time of serious market disruptions and unpredictable global supply chains. They also weaken our ability to contribute to food and energy affordability. While food availability, at the moment, is not at stake in the EU, food affordability for low-income households is increasingly a concern. Furthermore, EU agricultural production will be impacted by the EU's strategic dependences on a number of key inputs².

... can lead to negative impacts on biodiversity and the relocation of EU environmental footprint

While some species need protected areas to thrive, there are many species whose preferred habitats are man-made and managed habitats, like sustainably managed forests. The restriction of production³, when not accompanied by more efficient use, inevitably leads to relocations of production to parts of the world that do not have the same environmental standards, thus leading to carbon leakage and to the export of environmental problems. In addition, restrictions in the production of renewable raw materials lead to substitution by more energy-intensive materials, with a bigger environmental footprint. Here we note that a Carbon Border Adjustment Mechanism is not yet in place.

... undermine the trust of practitioners

A top-down approach is likely to impede the willingness to cooperate on the part of landowners. Landowners and managers of farmland and forests from across Europe have shown their support for the implementation of the Natura 2000 network on the condition that social and economic activities can be combined with ecological objectives. During the last 30 years, the social and economic component of this agreement was/is systematically undermined. The EU Nature Restoration Law will add to this negative feeling, likely frustrating the goals stated in the EU nature policies.

Therefore, we call on the European Commission, the European Council and the European Parliament to rethink the EU Nature Restoration Law and the Sustainable Use Regulation to better address climate challenges and better balance sustainable production and biodiversity protection, where unintended negative consequences are well thought through.

This declaration was adopted by representatives of Landowners in different European Countries, in Stockholm on the 30th of November 2022:

Signed by



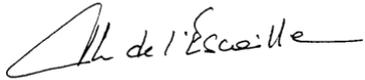
Pierre-Olivier Drège, Vice-President Foundation Sommer (FR)

² <https://epthintank.eu/2022/05/20/future-shocks-2022-safeguarding-eu-and-global-food-security/>

³ according to calculations by the German state-funded Thünen Institute, implementing the goals set out in the EU Biodiversity Strategy, which the Nature Restoration Law aims to achieve, would reduce German timber production by up to 48 percent



Max Freiherr von Elverfeldt, Vorsitzender der Familienbetriebe Land und Forst



Thierry de l'Escaille, Secretary General of the European Landowners' Organization



Constantin Kinsky, Vice President & Board member
SVOL - Czech Association of Municipal, Private and Church Forest Owners



Gabriel Lodaes, Aproca Spain



Gunnar Palme
President Swedish Landowners Federation



Roel Robbertsen, Chairman, Dutch Federation for Private Landownership

A handwritten signature in black ink, consisting of a large capital 'B' followed by a series of connected loops and a long horizontal stroke at the end.

Bertrand Servois, Président, Union de la Coopération Forestière Française