

Dear Member of the European Parliament Committee on the Environment, Public Health and Food Safety,

Six months ago, the Glasgow Leaders' Declaration on Forests and Land Use rightly drew attention to the critical role of forests in enabling the world to meet the climate commitments set out in the Paris Agreement, and also its broader sustainable development goals. Leaders of 141 countries committed to 'halt and reverse forest loss and land degradation by 2030'.

Public attention often focuses on deforestation, the wholesale clearance of forests for urbanisation, infrastructure development, mining or – most commonly – agriculture. **It is our belief that, alongside deforestation, the extent of forest degradation is just as critical an issue.**

By forest degradation we refer to changes within a forest that significantly and negatively affect its species composition, structure or function, and reduce the forest's capacity to absorb carbon, and deliver other ecosystem services, support biodiversity and supply forest products. Forests can be degraded as a result of logging operations, wood fuel extraction, shifting agriculture, grazing or fires. In all of these cases the forest retains a capacity to regrow, but these activities typically reduce carbon stocks, biodiversity, and ecosystem functions faster than they naturally recover.

Although the data is uncertain, a 2015 study suggested that carbon emissions from forest degradation were equivalent to a quarter of those from deforestation in the decade 2001–10, increasing to one third of those from deforestation in the period 2011–15 (with substantial variation across countries.)¹ Given that forest loss currently accounts for roughly 8 billion tonnes of carbon dioxide emissions per year, forest degradation therefore contributes about 2.5 billion tonnes, roughly equivalent to 5 per cent of global greenhouse gas emissions.²

As well as contributing to climate change, forest degradation can also be a precursor to outright deforestation: the construction of roads for logging or mining activities, for example, makes it easier for people to gain access to forests and subsequently convert them completely, most commonly to agriculture. Forest degradation can also contribute to disruptions of water cycles and increased soil erosion.

These issues are central to the current debates over the proposed EU regulation on deforestation. The regulation includes forest degradation in its definition of 'deforestation free' – one of the criteria that the designated products must meet to be placed on the EU market. It defines forest degradation as:

'harvesting operations that are not sustainable and cause a reduction or loss of the biological or economic productivity and complexity of forest ecosystems, resulting in the long-term reduction of the overall supply of benefits from forest, which includes wood, biodiversity and other products or services.'

It is clear that this definition refers to the extraction of timber from forests (clearance for agriculture is covered by the definition of 'deforestation'). The regulation further defines 'sustainable harvesting operations' as those that minimise negative impacts, including avoiding the degradation of primary forests or their conversion into plantation forests.

We understand that some EU member-state governments are concerned at the inclusion of forest degradation in the regulation, particularly given its potential impact on their national forest industries, and that some may propose removing all references to forest degradation.

¹ Sandro Federici et al, 'New estimates of CO₂ forest emissions and removals: 1990–2015', *Forest Ecology and Management* 352 (2015). See also:

Pearson, T.R.H., Brown, S., Murray, L. et al. Greenhouse gas emissions from tropical forest degradation: an underestimated source. *Carbon Balance Manage* 12, 3 (2017); and Kruid, S, Macedo, M, Gorelik, S., et al Beyond Deforestation: Carbon Emissions From Land Grabbing and Forest Degradation in the Brazilian Amazon , *Frontiers in Forests and Global Change* 4 (2021)

² Harris, N.L., Gibbs, D.A., Baccini, A. et al. Global maps of twenty-first century forest carbon fluxes. *Nat. Clim. Chang.* 11, 234–240 (2021). <https://doi.org/10.1038/s41558-020-00976-6>

We believe this would significantly weaken the ambition behind the regulation. Forest degradation is a significant source of greenhouse gas emissions. Any failure to include degradation in the regulation would run counter to the aims of the Glasgow Leaders' Declaration and undermine the EU's professed desire to see Europe become the first climate-neutral continent by 2050.

Exclusion of degradation in the EU regulation would also gravely weaken the EU's ability to argue for unified global action to protect forests. Most of the commodities and products listed in the regulation are produced in tropical countries and not in the EU. Within the EU, however, forest degradation is relatively more prevalent than "deforestation." Removing degradation from the regulation could therefore hinder the legislation from tackling forest loss on EU soil and create a perception that the EU is evading its own forest-related responsibilities—instead throwing the burden on to developing countries in the tropics.

We believe that it is possible to include a definition of forest degradation within the regulation that both protects forests and preserves the ability of EU timber enterprises to operate sustainably. We therefore call on the European Parliament to retain a strong definition of forest degradation within the regulation.

Yours,

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