



Naturskyddsföreningen

22 September 2025

President of the European Commission

Ursula von der Leyen



**FÄLT BIO
LOGERNA**

In response to the letter from the Prime Ministers
of Finland and Sweden, dated 15 September 2025

On behalf of Suomen luonnonsuojeluliitto (The Finnish Association for Nature Conservation), Naturskyddsföreningen (The Swedish Society for Nature Conservation), Luontoliitto (The Finnish Nature Association) and Fältbiologerna (Nature and Youth Sweden) we respond to the letter issued by Prime Ministers Petteri Orpo (FI) and Ulf Kristersson (SE) and emphasize the importance of protecting and strengthening land use sector carbon sinks.

For Member States to achieve climate targets, including the EU's goals for 2030 and 2050, as well as national climate neutrality targets, emissions must be reduced and forest carbon sinks strengthened.

In Finland land use sector sinks have turned into net sources of emissions. Data released earlier this year showed that Finnish forests have become a net emission source. According to preliminary data Finland's land use sector net emissions amounted to 13.5 Mt CO₂-eq in 2024. The sector currently needs additional measures of up to 34 Mt CO₂-eq to achieve the national climate neutrality target by 2035. Finland is also at risk of failing to meet its EU LULUCF obligations.

Sweden has seen similar declines in the forest carbon sink. The net removal by forestry and forest products has decreased from more than 60 Mt CO₂-eq/year annually during 1990-2010 to 39 Mt CO₂-eq/year in 2022. The Swedish government estimates that they will miss the LULUCF-target by 63-71 CO₂-eq for 2021-2025 and 53-79 CO₂-eq for 2026-2030. The combined effect of reforms proposed in 2025 is estimated to increase the uptake with 0.16 CO₂-eq to 2030. Logging intensity had a general upward trend and reached all-time peaks in 2021-2022, despite a declining trend in forest growth since 2012.

This outcome has been entirely foreseeable. Researchers, environmental organisations and other experts have repeatedly warned that logging at current levels in Finland and Sweden reduces forest carbon sinks. Numerous corrective measures have been proposed, yet they have not been implemented. Instead, the Finnish and Swedish Governments are working actively to weaken the LULUCF Regulation. This is not a passive failure caused by circumstances. Land use sector sinks have been undermined through political choices which are contrary to given scientific advice and the EU's and national climate targets.

The consequences of those political choices are now visible. They must urgently be addressed. Diminished forest carbon sinks in Finland and Sweden jeopardize not only

national climate targets but also the EU-wide climate strategy and the credibility of the European Green Deal. The tools to achieve this already exist, including the LULUCF Regulation.

As prime ministers Kristersson and Orpo point out, Swedish and Finnish forests have already been impacted by climate change. This is set to worsen if climate targets are not met and, additionally, if forest management methods are not changed. The land use sector has a very important role to play in mitigating climate change.

Suggesting that any EU Member States should be awarded an exemption from the LULUCF Regulation on the grounds that it is too stringent for maintaining economic competitiveness in land use sectors is neither realistic from a climate perspective, nor from a legal perspective, wherein all Member States must act in union to achieve a sustainable future.

We urge the Commission to uphold a strong LULUCF framework and to ensure measures that focus on emissions reductions and strengthening forest resilience and carbon sinks. This is the only credible path to tackling the climate crisis.

Respectfully,

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