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Finland, together with the other Northern EU countries, has been seen as a progressive force and frontrunner in the fight against climate change and in efforts to build a cleaner future altogether.

However recent forceful interventions by the Finnish government and other Finnish EU politicians in the current negotiations on the EU's key climate and energy policies have damaged this image and cast serious doubt on Finland's climate ambition. These interventions have revealed that when it comes to climate change, Finland has a blind spot: Forests.

In the negotiations over the new **LULUCF regulation** Finland is arguing that carbon emissions from increasing forest logging and even deforestation should be allowed to a large extent without consequences. At the same time Finland is the EU's strongest advocate of using more wood for energy. This has already led to increases in forest logging in the EU and in countries supplying it with wood pellets at a scale that is making forest biomass a climate problem.

As European and international civil society groups defending nature, people's rights and fighting climate change, we see **forests as part of the answer to climate change**. Forests can absorb and keep carbon away from the atmosphere - a role that urgently needs strengthening. Using wood for high value long-lived products can also be part of the solution.

The politics advocated by the Finnish government that incentivize greater wood use for energy, releasing carbon into the atmosphere quickly and politics



















that hide these climate impacts, make forests part of the problem rather than the solution. Politics that prevent forests from absorbing and storing more carbon and that ignore the carbon emissions of bioenergy jeopardize the role of forests in the EU's climate politics.

Even more importantly, the way that Finland and EU treat forests on the climate agenda has a **strong impact at the international level** that should not be ignored. Applying the same rules that Finland is now advocating internationally would effectively endanger implementation of the Paris Agreement. Actions in Europe need to be consistent with actions needed at international level.

We therefore urge the Finnish Government and MEPs from its political parties to take action in support of rapid decarbonization of the EU economy in line with the Paris Agreement, while restoring the positive role of forests and the role of Finland as a progressive force in the EU's climate agenda, and to:

- Strive for EU policies that increase the carbon removal and storage of forests in the future even more than today and keep honest and transparent track of this in the context of the LULUCF regulation
- Limit the use of wood for energy in the context of the Renewable Energy
 Directive in favor of genuinely low carbon renewables such as wind and solar
- Make sure that public subsidies only support wood use in ways that deliver genuine climate benefits

Yours sincerely,

ARA

BirdLife Europe
Carbon Market Watch
Climate Action Network Europe
Denkhaus Bremen
Partnership for Policy Integrity

Southern Environmental Law Center

Rainforest Rescue

Woods Hole Research Center

Biofuelwatch

Fern

ClientEarth

Dogwood Alliance

National Resource Defense Council

Pro Regenwald

The Rainforest Foundation
Transport & Environment
WWF European Policy Office

















