

Stockholm 28 March 2023

Regulation on Nature Restoration risks jeopardising Sweden's social development and preparedness

Nature restoration is vital for preserving and strengthening biodiversity as well as delivering ecosystem services. Such measures are needed to ensure the resilience of ecosystems and to meet ongoing climate challenges. Sweden is in the midst of a transition to becoming fossil-free and our companies are taking a lead in this work.

In Sweden, healthy and productive ecosystems are a prerequisite for ensuring the continued transition in harmony with nature. Yet at the same time, these efforts must be balanced against other societal interests. As the proposal for the Regulation currently stands, millions of hectares of productive forest land in Sweden risk being taken out of productive use at the same time as agriculture, raw material and energy supplies are being restricted. Indeed, if the wording of the proposal is followed to the letter, several cities would have to be demolished. According to the Swedish Forest Agency, the societal costs are estimated at SEK 175 billion just to redeem forest land. We are therefore concerned that these issues are not addressed. All in all, Sweden's competitiveness, growth, self-sufficiency and climate change adaptation are being impacted.

We, the undersigned, are concerned by recent developments in the negotiations in the Council. We urge the Swedish government to work towards:

- Ensuring Sweden's self-determination in terms of its land use, societal preparedness and societal development. In the current geopolitical situation, it is important that the proposal takes greater account of both Sweden's and the EU's security of supply.
- Avoiding hindering voluntary initiatives and ensuring that Sweden retains control over its own priorities in nature conservation work. Sweden has a tradition of restoring nature through a range of approaches to nature protection and through strong environmental considerations; indeed, many such measures are carried out voluntarily and without state support. Such measures are threatened by the strict non-deterioration requirements within the Regulation. It is important to increase the quality of the areas that are currently protected. The focus should instead be on qualitative measures for selected habitat types, rather than quantitative measures for all areas.
- Setting national reference areas that are comparable to EU-wide guidelines and that Sweden's reference areas are updated according to, for example, the year of entry into force of the Species and Habitats Directive. Information from the Council of Ministers suggests that the negotiations in this area are actually moving in the opposite direction. The Regulation must have a harmonised interpretation throughout the Union. All countries must raise their ambitions, not just those countries that have already been working long and hard to preserve and restore nature.

As the development of society as a whole is affected, it is important that the relevant ministries are aware of the consequences for the proposal based on the latest developments in the negotiations. We are happy to meet to expand upon our reasoning in more detail.

Viveka Beckeman, CEO



Palle Borgström, President



Karin Johansson, Deputy DG



Maria Sunér, CEO



Anders Holmestig, CEO



Mårten Sohlman, CEO



Catharina Elmsäter-Svärd, CEO



Annika Roos, CEO

