

Business call for the EU to include “other wooded lands” to protect nature in the EU’s regulation for deforestation-free commodities

To EU Ministers, Members of Parliament and the Commission

We write to you as a group of companies to express our support for the inclusion of other wooded lands into the upcoming EU regulation on deforestation-free products.

We welcome and acknowledge the work being done by the EU on a regulation to curb the use of forest-risk commodities, and we welcome efforts to create an ambitious yet enforceable law.

However, **we strongly believe that the EU should not limit its ambition to protect forests, but seek to prevent conversion of other wooded ecosystems.** We are in the midst of a climate and biodiversity crisis and the protection of ecosystems is needed to mitigate and adapt to this crisis. Furthermore, adding “other wooded lands” would make it easier for companies to implement and allow for a level playing field.

Adding “other wooded” lands will make the regulation easier for companies to adhere to and will create a level playing field. Companies will not have to distinguish between different types of forest and wooded ecosystems in their due diligence process, which will allow for a more equal market for all companies and create less confusion when implementing. In addition, companies that are already trying to protect all types of ecosystems by sourcing responsibly will not be disadvantaged by the regulation.

Adding “other wooded lands” would make the regulation easier to implement. In areas such as the Cerrado, Brazil, it will be difficult, if not impossible, to apply the current regulation as it is i.e. some areas of the Cerrado could be categorized as forest depending on the season and fall outside during other seasons. None of the existing monitoring systems are able to differentiate between forest and non-forest in the Cerrado biome and thus it will become difficult for operators sourcing from the Cerrado or similar forest-mosaic landscapes such as African savannah areas to adhere with the regulation. This would most likely be the case in other areas globally as well and will make it difficult for the competent authorities to determine compliance with the regulation¹.

It is possible to monitor conversion of other wooded lands as proven by Observatorio de Clima and the Accountability Framework Initiative. In Brazil the civil society initiative MapBiomass is monitoring all land use and land cover changes in a 30m x 30m pixel on the entire Brazilian territory and other observation programmes like Copernicus are also able to track conversion of other types of land². Companies will be able to use these tools to implement the regulation and to limit conversion of forest and other wooded lands in Brazil and other countries.

The effect of our demand on other ecosystems is already known. Thus, there is no need to wait two years for a review to conclude what is fully understood today. Immediate

¹ AFI briefing on the deforestation regulation

² Policy brief by Observatorio de Clima:

<https://www.oc.eco.br/wp-content/uploads/2022/10/Wooded-land-policy-brief.pdf>

action is needed. Already, 57 percent of the Cerrado has been lost³, and the pressure on non-forest ecosystems such as the Cerrado will only increase if the EU does not ensure their protection in this new regulation.

The Parliament has proposed to include FAO's definition of "other wooded lands" into the regulation, which would strengthen the scope of the regulation and expand the protection of important ecosystems to cover more forest-mosaic landscapes such as the Cerrado and the Caatinga in Brazil, as well as the Gran Chaco. **Currently, this is the most ambitious proposal on the table and we therefore encourage you to add "other wooded lands" to the final text.**

By including "other wood lands" under the scope of the regulation 82 percent of the Cerrado will be protected⁴. The Cerrado is at the frontier of commodity-driven ecosystem destruction linked to the EU market. The majority of EU soy and beef imports originate from the Cerrado and it is therefore crucial that the EU ensures the protection of this biodiverse wooded savannah. Similarly, adding other wooded lands to the regulation will ensure that 93 percent of the Caatinga white forest in Northern Brazil is protected as compared to only 11 percent under the forest definition. It will also protect African savannah forest-mosaic landscapes at risk of conversion as well as forest-mosaic landscapes in Asia.

The EU needs to take responsibility for its imports and exports and lead the way globally. Extending the scope of the regulation to cover "other wooded lands" would ensure a stronger protection of crucial ecosystems globally and make the regulation more implementable for companies and competent authorities alike. **Adding "other wooded lands" to the regulation will benefit not just the climate and nature, but also companies** and consumers supporting the #Together4Forests campaign.

We remain at your disposal for any questions you may have.

Yours sincerely,

ECOSIA



Triodos  Bank

 Ahold Delhaize

³ Mongabay: <https://rainforests.mongabay.com/cerrado/>

⁴ Trase study:

<https://www.greens-efa.eu/en/article/study/proposed-eu-regulation-on-deforestation-and-forest-degradation>



a coalition of companies committed to the use of raw materials sustainable, traceable and respectful of natural ecosystems.



Signatories:

Ecosia

Patagonia

Ahold Delhaize

Triodos Bank

Toms

Intratuin Netherlands

Alliance for the Preservation of Forests (a coalition of companies committed to the use of raw materials sustainable, traceable and respectful of natural ecosystems.)

Lidl Stiftung & Co. KG

Van Selfie

Centraal Bureau Levensmiddelenhandel

Aldi Süd

Aldi Nord

EDEKA Zentrale Stiftung & Co. KG

Kaufland

REWE

Waardenburg Ecology

BUDNI Handels- und Service GmbH & Co

S Group

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