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DIRECTORATE-GENERAL
ENVIRONMENT
Directorate D – Biodiversity
ENV.D.2 – Natural Capital & Ecosystem Health

Brussels, 22 April 2026

Subject: Implementation of the Nature Restoration Regulation and forest management in Germany

Dear Petitioner,

Thank you for your letter to Commissioner Roswall and/or Commissioner Hansen, concerning the Nature Restoration Regulation (NRR) ⁽¹⁾ and forest management in Germany. The Commissioners have asked me to reply on their behalf.

The Commission takes the concerns expressed by forest owners regarding the future of forests in the EU, including German forests, very seriously. Forest managers and owners play an essential role in maintaining and restoring healthy ecosystems and ensuring that forests can provide their full range of economic, environmental and social benefits. The NRR supports sustainable use of forests, and its flexible approach allows to put in place solutions tailored to the local situation. Climate change considerations are also fully embedded in the set-up of the NRR, and notably, the contribution of nature restoration to climate mitigation and adaptation is one of its main objectives.

Let me first react to your concern regarding forest ecosystems and their management. There are several NRR targets that concern forests: first, there are targets that relate to the biodiverse and valuable habitat types of European concern listed in Annex I of the NRR, which are the same habitat types listed in the Habitats Directive. These habitat types cover around 16% of the German forest area, and a significant part is located within protected areas. For these habitats, the NRR requires Member States to put in place the restoration measures necessary to contribute to the recovery of their good condition and area over time. In doing so, the NRR also provides a range of opportunities to take climate change into account in their conservation and management. While their management should be respectful of nature conservation objectives, natural dynamics, such as those induced by climate change, can be integrated through the implementation of the Regulation. This may include the assisted migration of habitat types or nature-near forestry approaches.

As for the forest areas not included in the Annex I habitats (about 84% of German forests), the NRR requires improvements in certain indicators at national level with a degree of flexibility for indicator selection. Measures to achieve these improvements shall enhance

⁽¹⁾ Regulation (EU) 2024/1991 - <https://eur-lex.europa.eu/eli/reg/2024/1991/oj/eng>

the biodiversity and resilience of forest ecosystems, while leaving Member States flexibility as to where and how these improvements are achieved.

You call for the adoption of a ‘stop-the-clock’ mechanism and a review of the NRR. The Commission adopted an environment simplification package ⁽²⁾ on 10 December 2025, without reopening the NRR. After assessing the suggestions received in the Call for Evidence ⁽³⁾, the Commission did not put forward legislative changes where existing legal framework already provides substantial flexibility, progressive implementation over time and scope for practical flexibilities in implementation that do not require legal amendments. That is the case of the NRR, whose implementation is at an early stage, and which includes a staged planning approach, revisions of national restoration plans over time and considerable room to reflect national and regional circumstances in the design of restoration measures.

Member States can mobilise necessary funds from public and private sources, including the Common Agricultural Policy funds, regional funds, the LIFE Programme, Horizon Europe and the European Maritime, Fisheries and Aquaculture Fund. In the future, the Commission has proposed that funding for restoration is made available through National and Regional Partnership Plans under the Multiannual Financial Framework 2028-2034, alongside the EU Competitiveness Fund.

We are fully aware that implementing a comprehensive new piece of legislation like the NRR presents challenges for authorities and stakeholders. As set out in the Communication on Simplifying for Sustainable Competitiveness ⁽⁴⁾, the Commission has intensified its support to Member States and regional authorities in the preparations of draft national restoration plans. In that context, we remain ready to discuss practical issues that foresters, farmers and other stakeholders may encounter, with a view to identify suitable implementation solutions in their specific context.

Forest owners, managers and their representative organisations have a crucial role to play in the preparation of national restoration plans. Your active engagement in national consultations will help ensure that restoration measures are realistic, effective and aligned with the long-term resilience, productivity and sustainability of German forests.

Thank you again for taking the time to share your views.

Yours sincerely,

Bettina Doeser
Head of Unit

⁽²⁾ https://environment.ec.europa.eu/publications/simplification-administrative-burdens-environmental-legislation_en

⁽³⁾ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14794-Simplification-of-administrative-burden-in-environmental-legislation_en

⁽⁴⁾ COM(2025)980 - <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM:2025:980:FIN>