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Hr Humberto Delgado Rosa  
DG Environment  
Avenue d'Auderghem 19  
Oudergemselaan 19  
1040 • Bruxelles / Brussel • Belgium

Dear Mr. Rosa,

We are writing to you to bring to your attention some recent and very concerning developments in the Swedish implementation of the landmark Nature Restoration Law (hereafter NRL) and the Swedish reporting under the Habitats Directive.

The provisions on re-establishment of natural habitats of community interest and the non-deterioration provisions in Articles 4 and 5 are in many ways the backbone of the Nature Restoration Law. Complete and loyal implementation of those provisions in all member states is crucial to ensure that the EU can deliver on its commitments under the Kunming-Montreal Global Biodiversity Framework.

As you may know, the Swedish government has been in staunch opposition to the NRL throughout the legislative process, leading up to the adoption of the law last summer. By abandoning science-based reporting of favorable reference area and even aiming to manipulate the basic criteria for identifying two of the forest habitats of most concern in Sweden, the Swedish government is attempting to blatantly undermine the implementation of the Nature Restoration Law.

Furthermore, the Swedish government has notified the Commission that Sweden intends to apply the derogation in Article 4.13, disregarding the fact that the Swedish competent authorities have clearly indicated that the conditions set out in Article 4.13 are not met. The government is very candid when it comes to the underlying purpose; it means to ensure that the NRL does not threaten business as usual in the Swedish forestry sector.

Please find attached a memorandum outlining the details of this issue, with further references to underlying reports and memorandums from Swedish expert authorities that shed further light on the discrepancies between ecological and legal requirements in the NRL and the nature directives on the one hand, and the direction taken by the Swedish government on the other. We urge you to consider the facts and circumstances outlined in the memorandum, and to ensure that your team proactively engages in a critical dialogue with the Swedish government regarding the Swedish implementation of the NRL. Once the draft national restoration plan is submitted, time to adapt and make corrections based on your observations will be limited.

We intend to continue reviewing the preparation of a draft national restoration plan for Sweden. Our experts are at your and your team's disposal should you have any questions related to the Swedish implementation of the NRL.

Sincerely,



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A handwritten signature in blue ink, appearing to read "Karin Lexén".

Karin Lexén  
General Secretary,  
Swedish Society for Nature  
Conservation

A handwritten signature in blue ink, appearing to read "Kjell Carlsson".

Kjell Carlsson  
President  
BirdLife Sweden

A handwritten signature in blue ink, appearing to read "Gustaf Lind".

Gustaf Lind  
General Secretary,  
World Wildlife Fund Sweden

A handwritten signature in blue ink, appearing to read "Regan McEnroe".

Regan McEnroe  
President  
Nature and Youth Sweden



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## Background

The provision on re-establishment of natural habitats of community interest in Article 4(4) and Article 5(4) of the NRL is a key component of the Nature Restoration Law. To ensure that the purpose of Article 4 and 5 (to achieve favorable conservation status for protected habitat types) is achieved, favorable reference areas (FRAs) must be based on the best available scientific evidence. This is also reflected in the definition of favorable reference area in article 3(8) of the NRL, where it is clearly stated that the FRA for a habitat type must reflect the ecological requirements of the habitat and its typical species.

## Politicized reporting under Article 17 of the Habitats directive

Sweden has been a forerunner in reporting Favorable reference areas (FRAs) using a reference-based methodology, where scientifically based threshold values for habitat loss have been taken as a starting point for establishing FRAs for habitats with large historical losses in area. However, in the last two years, the Swedish preparations for reporting under Article 17 of the Habitats directive in 2025 have become increasingly politicized.

In March 2023, the Swedish Environmental protection agency (EPA) was assigned by the Swedish government<sup>1</sup> to review and revise favorable reference areas for habitats listed in the Habitats Directive. The stated rationale for the revision was that the NRL introduces new requirements to reach favorable reference areas for all habitats, and that this increases the need for comparability between member states.

In November 2023, the government altered the instructions for the review, stating that for habitats dependent on traditional management regimes, consideration must be given to what is “considered to be economically feasible”<sup>2</sup>.

The result of the review conducted by the EPA was published in March 2024<sup>3</sup>.

## Revised favorable reference areas for grassland habitats

In line with the instructions from the government to apply economic considerations when determining FRAs for habitats dependent on traditional management regimes, the EPA developed four model-based alternative calculations for favorable reference areas for grassland habitats. In three out of four alternatives, consideration was given to the current presence of active farms with grazing animals and the present density of grassland habitats. In these calculations, landscapes with low densities of grassland habitats (below 0,5%, 1% and 2% respectively) were entirely excluded from the calculation of the FRA. The underlying assumption of this approach is that it is not economically and ecologically feasible to re-establish grassland habitats in areas with low current density of grasslands and absence of active farms with grazing animals. This means that in areas with low densities of either

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<sup>1</sup> Swedish Government 2023. Regleringsbrev för Naturvårdsverket [Ändringsbeslut 2023-03-02 Myndighet Naturvårdsverket](#)

<sup>2</sup> Swedish Government 2023. Regleringsbrev för Naturvårdsverket [Ändringsbeslut 2023-11-30 Myndighet Naturvårdsverket](#)

<sup>3</sup> Naturvårdsverket 2024. Översyn av referensarealer för naturtyper [Översyn av referensarealer för naturtyper](#)



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grassland habitats or active cattle farms, restoration efforts will be limited to often isolated existing habitat areas that are not in good condition.

In their report, the EPA assessed that revised reference areas for grassland habitats should be in a range between 4 600 – 7 300 km<sup>2</sup>. This range corresponds to values derived from two alternatives with a threshold value for current density of grassland habitat types in the range 1-2% and corresponds to only 17-33% of the area reported as FRA in 2019. According to the EPA, the revised range represents “varying degrees of feasibility and likelihood of long-term preservation of the habitats and their typical species”, and notes that “to significantly improve the status of habitat types and species, the restored areas need to be in the upper part of the range”. Furthermore, the EPA clearly indicates that there are large uncertainties regarding estimated area requirements both overall and for individual grassland habitat types.

Notably, two senior officers in the EPA announced their dissenting opinions in a separate memorandum<sup>4</sup> published as an appendix to the report, stating that the reference values proposed by the EPA for grassland habitats were based on an incorrect interpretation of the Habitats Directive, the EU guidance on Article 17 reporting and the definition of FRA in the Nature Restoration Law. Their opinion was that the FRAs proposed by the EPA “are not based on the best available scientific evidence and cannot be considered sufficient to achieve favorable conservation status for traditional grassland habitats”.

We consider the approach taken by the EPA when determining FRAs for grassland habitats to be highly questionable, from both a legal and ecological perspective. In the definition of FRA in the NRL, a key component is that the FRA should “ensure the long-term viability of the habitat type and its species, and all its significant ecological variations *in its natural range*”. Excluding a large share of the country, often areas with the most severe historical losses of grassland habitats, based on low current density of grassland habitats, does not represent the best available scientific knowledge. On the contrary, there is sound scientific evidence that the need for re-establishment of habitats is often even more pressing in areas with fragmented and sparse occurrences of such habitats. The genetic diversity of specialized grassland species often follows geographical patterns, which means that certain genotypes will only be found in areas that the EPA proposes to exclude from efforts to reestablish grassland habitats.

## Revised favorable reference areas for forest habitats

For forest habitats, the EPA and the Swedish Forest Agency (SFA) used a similar reference-based methodology as was used in the last reporting cycle in 2019. In total, reference areas for 23 out of a total of 30 forest habitats present in Sweden were slightly adjusted in relation to the latest Article 17 reporting in 2019. The sum of the revised reference areas amounted to approximately 90,500 km<sup>2</sup>, which is approximately 4,400 km<sup>2</sup> higher than the values reported by Sweden in 2019. The main reason why several revised FRAs were larger than in the latest reporting was the use of a refined method and data for estimating historical areas. At the same time, current values for several forest habitats were revised based on new data. Based on the revised FRAs proposed by the EPA, the difference between the proposed summarized reference area and the current area (which forms the basis for the restoration requirements in Article 4(4) of the EU Nature Restoration Law) would be 25,700 km<sup>2</sup>, compared to approximately 25,100 km<sup>2</sup> at the time of the last reporting in 2019.

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<sup>4</sup> See Appendix 1 (Bilaga 2 till Beslut om Redovisning av RU Översyn av referensarealer för livsmiljötyper.pdf)



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We consider the FRAs for forest habitats proposed by the EPA and the SFA to be based on the best available scientific knowledge, and in line with the guidance on reporting under Article 17 of the Habitats directive, and in line with the definition of FRA in article 3(8) of the NRL.

## Instructions for reporting under Article 17 of the Habitats directive

According to the current guidelines<sup>5</sup> on concepts and definitions related to the reporting period 2019-2024 Favorable reference values (FRVs) should be set on the basis of ecological considerations using the best available knowledge and scientific expertise. FRVs should also be set taking into account the precautionary principle and include a safety margin for uncertainty as well as the current situation and assessment of deficiencies (i.e. any pressures/problems) and historical trends.

In December of 2024, the appropriation directions<sup>6</sup> for the EPA included detailed instructions on reporting of FRAs for forest habitats, stating that FRA should be reported “based on the area in 1995, when the Habitats directive entered into force in Sweden”. Furthermore, The Swedish EPA was instructed to report FRAs as “unknown” for all habitat types dependent on traditional management and where the current area is considered to be lower than the FRA. Neither the government nor the competent authorities have presented any analysis or justification of using estimated values from 1995 as the FRA for forest habitats, or any reasons for reporting FRA for grasslands as “unknown”.

It is important to note that if re-establishment of forest habitats under Article 4(4) in the NRL is based on the estimations of the forest habitat area in 1995, Sweden would not be obliged to re-establish any forest habitats whatsoever, since the estimated area in 1995 is 4000 km<sup>2</sup> less than the revised current area<sup>7</sup>. Using an FRA that is lower than the current value is in obvious conflict with the legal definition of FRA in article 3(8) of the NRL, which clearly says that the FRA “is composed of the *current area of the habitat* type and, if that area is not sufficient for the long-term viability of the habitat type and its typical species or typical species composition, *the additional area necessary* for the re-establishment of the habitat type”.

The Swedish government has been blatantly clear when it comes to its motives in directing the reporting. According to a press release<sup>8</sup> the purpose of the instructions is to “contribute to improved Swedish competitiveness and reduced regulatory burden”. It is of course possible to base the Swedish national restoration plan on FRAs that differ from those reported in 2025 under Article 17 of the Habitats directive. However, the SFA has clearly indicated<sup>9</sup> that the Swedish government has

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<sup>5</sup> DG Environment. 2023. Reporting under Article 17 of the Habitats Directive: Guidelines on concepts and definitions – Article 17 of Directive 92/43/EEC, Reporting period 2019-2024. Brussels. Pp 104 [Guidelines Art 17.pdf](#)

<sup>6</sup> Swedish Government 2025. Regleringsbrev för Naturvårdsverket [Ändringsbeslut 2025-01-30 Myndighet Naturvårdsverket](#)

<sup>7</sup> The reported increase in forest habitat area since 1995 is to a large degree a statistical artefact. For the purposes of reporting under the Habitats directive, forest habitat areas have been estimated based on data from the Swedish national forest inventory. This inventory uses very crude criteria for classifying forest habitat types, mainly based on stand age. Stand age alone is a poor criterion for identifying forest habitats, since old growth boreal forests naturally have an uneven age structure due to disturbances related to fire, floods, insect outbreaks or storms. This means that the methodology used for assessing current area of forest habitats in Sweden misses many areas that have been lost to clearcutting since 1995.

<sup>8</sup> Swedish government 2025 [Regeringen ger rapporterings- och analysuppdrag om gynnsam referensareal för art- och habitatdirektivets naturtyper - Regeringen.se](#)

<sup>9</sup> Email communication from The Swedish Forest Agency, 2025.04.30



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instructed the director generals of the EPA and SFA to use the areas from 1995 as FRAs when developing the draft National restoration plan.

An argument often repeated by the Swedish Government and the Swedish forestry sector is that revising FRAs is necessary to align the Swedish reporting and level of ambition in NRL implementation with that of other EU countries. We note that only a handful of EU countries have reported numerical values for FRAs so far, and that the new legal definition of FRA in the NRL means that *all* countries need to base their FRAs on the best available scientific knowledge on the ecological requirements of the habitats and their typical species.

We see scientifically based FRAs as the single most important prerequisite for reaching the overall objectives of the NRL. If undue consideration is given to industry interests in determining FRAs, the whole implementation of the NRL, and thus EU commitment to the underlying Kunming-Montreal global biodiversity framework, will be undermined. We therefore call on the European Commission to engage in a critical dialogue with the Swedish Government regarding FRAs for forest and grassland habitats.

## Politicized guidance and criteria for identifying and delineating forest habitats

In addition to radically lowering FRAs, the Swedish government has also taken steps to redefine the Swedish interpretation of two of the forest habitats of most concern in Sweden *Western taiga* (9010) and *Fennoscandian herb-rich forests with Picea abies* (9050).

For over 25 years, national guidance documents with criteria for identifying and delineating habitats of community interest have been used to identify habitats, designate Natura 2000 areas and report areas of such habitats to the Natura 2000 database. The Swedish guidance documents are based on the Interpretation manual of European Union Habitat types<sup>10</sup>, but introduce more detailed criteria and lists of characteristics of the habitats, as well as more comprehensive lists of typical species adapted to national circumstances.

In December of 2024, the appropriation directions<sup>11</sup> for the Swedish EPA included instructions to review and revise the national guidance documents with criteria for identifying and delineating two of the forest habitat types of most concern in Sweden: *Western taiga* (9010)<sup>12</sup> and *Fennoscandian herb-rich forests with Picea abies* (9050)<sup>13</sup>. The assignment is to be completed in February 2026 (same date as the draft NRP).

*Western taiga* includes a variety of old-growth boreal forest types and is by far the most widespread forest habitat in Sweden, with a current area of 25 431 km<sup>2</sup>. The current version of the guidance

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<sup>10</sup> DG Environment 2013. Interpretation Manual of European Union Habitats - EUR28 [Circabc](#)

<sup>11</sup> Swedish Government 2025. Regleringsbrev för Naturvårdsverket [Ändringsbeslut 2025-01-30 Myndighet Naturvårdsverket](#)

<sup>12</sup> Naturvårdsverket 2012. Vägledning för svenska naturtyper i habitatdirektivets bilaga 1 - Taiga [Vägledning sko - Taiga](#)

<sup>13</sup> Naturvårdsverket 2012. Vägledning för svenska naturtyper i habitatdirektivets bilaga 1 – Näringsrika granskogar [Vägledning skog - Näringsrika granskogar](#)



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document<sup>14</sup> was published in 2012 and closely follows the Interpretation Manual of European Union Habitat Types. The guidance document states that old growth boreal forests with their typical structures and functions and little negative human impact constitute *Western taiga*. Furthermore, it states that forests with some negative human impact, but where important structures and functions still exist, may also be classified as *Western taiga*. Lastly, it clarifies that naturally regenerated forests with some management impact, such as a lack of dead wood or older trees, should generally be considered *Western taiga*.

*Fennoscandian herb-rich forests with Picea abies* represents an ecologically as well as economically important habitat type in Sweden, due to its high productivity. According to the current national guidance document, the habitat type constitutes boreal forests that are dominated by Norway spruce (*P. abies*) and occur on basic bedrock, and in southern Sweden, often on humus-rich brown soil. The habitat type is nutrient-rich with varying water supply. The habitat type is often located in low-lying areas, on valley bottoms or on slopes with fine sediment and/or moving groundwater but can also occur on flatter land. According to the guidance document, the forest should be, or, in the relatively near future, be able to become an old-growth forest or resemble an old-growth forest in terms of its characteristics and structure. It may have been affected by, for example, clear-cutting, grazing or natural disturbance, so long as it is currently in a late or relatively late successional stage. Old trees and dead wood should be present, and there should be indications of ecological continuity for the relevant tree species. If natural disturbance processes have affected the area, areas in younger successional stages may also be included.

*Western taiga* and *Fennoscandian herb-rich forests with Picea abies* together include late succession stages of most of the productive boreal forest in Sweden and are therefore the habitat types of most relevance in relation to the non-deterioration provision in articles 4(11) and 4(12). This is clearly the reason why the Swedish government has chosen these two habitat types for review of the guidance document and criteria. The EPA is instructed by the government to conduct the revision with a view to “avoid over implementation” and with consideration given to how the application of the guidelines “affects the competitiveness of Swedish companies with regard to regulatory burden, administrative costs and other compliance costs”.

In our view, these instructions clearly allude to the potential effects of the non-deterioration requirement on the Swedish forest industry, which currently sources a large share of its timber from the remaining old, unprotected forests with intact ecological continuity<sup>15</sup>, especially in northern Sweden. In the latest evaluation of the progress towards the Swedish national environmental objectives<sup>16</sup>, the main message from the EPA and the SFA was clear: The ongoing loss of old-growth forests is the main driver of biodiversity loss in Swedish boreal forests, and powerful measures are required to stop the current trend. For species linked to long ecological continuity and species that need habitats that are currently uncommon in the forest landscape, the current situation is described as especially problematic. We note that it is the opinion of the competent authorities that such old-growth forests display almost 100% overlap with habitats listed in the Habitats directive and the NRL<sup>17</sup>, and that many such species are listed as typical species in those habitats.

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<sup>15</sup> Ahlström, Anders Canadell, Joseph G, Metcalfe Daniel B. 2022. Widespread Unquantified Conversion of Old Boreal Forest to Plantations. Earth's Future Volume 10, Issue 11. [Widespread Unquantified Conversion of Old Boreal Forests to Plantations - Ahlström - 2022 - Earth's Future - Wiley Online Library](#)

<sup>16</sup> Swedish Forest Administration 2023. Levande skogar – Fördjupad utvärdering 2023 [2022–12. Levande skogar. Fördjupad utvärdering 2023](#)

<sup>17</sup> Naturvårdsverket 2023. Urskogar och naturskogar - sammanställning av underlag och bedömning av arealer- Kunskapsunderlag till miljömålsberedningen [Rapportmall](#)



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It should be noted that Sweden currently lacks a comprehensive inventory of forest habitats outside the Natura 2000 network, which means that the criteria and descriptions in the guidance documents will have a decisive impact on the implementation of the NRL, and particularly the non-deterioration requirement. If Sweden is allowed to redefine listed habitats to allow for business-as-usual (i.e. clearcutting, land-scaring and planting of refined seedlings) in the forestry sector, the non-deterioration requirement in the NRL will to a large degree be rendered ineffective in Swedish forests. We therefore call on the European Commission to urgently engage in critical dialogue with the Swedish Government regarding the criteria for identifying and delineating *Western taiga* and *Fennoscandian herb-rich forests with Picea abies*.



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## Sweden's application of the derogation provided in Article 4(13) of the Nature Restoration Law

In February 2025, The Swedish government notified the European commission of its intention to apply the exemption under Article 4(13) of the EU Nature Restoration Law (NRL). The derogation means that, in the absence of alternatives, the non-deterioration requirement under Article 4(11) and (12) may be applied at biogeographical level instead of at site level.

### Swedish competent authorities' assessments of Sweden's ability to fulfil the conditions for applying the derogation in Article 4(13)

In the autumn of 2024, the Government assigned relevant authorities with the task of investigating the possibilities for Sweden to notify exemptions under Article 4(13) of the NRL. Their opinions were submitted to the Swedish government in the end of January 2025.

The authorities' main considerations and conclusions are presented below.

#### The Swedish Environmental Protection Agency

The Swedish Environmental Protection Agency (EPA) notes that the obligation to monitor under Article 4(13) of the NRL arises immediately when the Member State has notified its intention to apply the exemption<sup>18</sup>. Since there is currently no such monitoring system in place in Sweden, this criterion is not met.

The EPA interprets the article to mean that a prerequisite for a habitat type or species to be notified for exemption is that the Member State has established that there are no alternatives. According to the EPA, Sweden will need to be able to show on objective grounds that alternatives are lacking for each habitat type, habitat for species, and each biogeographical region where the exemption is notified. However, no such analysis is conducted by the EPA.

The EPA interprets Article 4(13) to mean that all requirements in Articles 15(3)(g), 20(1)(j), 21(1) and 21(2b) must be met *at the latest* when the exemption is applied. This means that at the latest when the derogation is applied, the system of compensatory measures must be in place. The EPA assesses that existing Swedish legislation is not sufficient to meet the requirement for a **compensation system** required by Article 15(3)(g).

#### The Swedish Board of Agriculture

The Swedish Board of Agriculture (SBA) makes the assessment<sup>19</sup> that the Member State, in connection with the notification of the derogation, must notify the Commission for which habitat types and for which habitats for species in each biogeographical region it intends to apply the derogation. The SBA notes that this knowledge is probably lacking in Sweden.

In addition, the SBA notes that Sweden also needs to meet the requirement that a monitoring system under Article 20(1)(j) or regional environmental monitoring, which can give a more definite opinion on grassland habitat types or bird habitats at the "local level". The SBA's preliminary assessment is that Sweden does not currently have access to monitoring programs and cannot produce such programs

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<sup>18</sup> See Appendix 3

<sup>19</sup> See Appendix 2



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in time to meet the requirement at the time of notification. The SBA notes that extending environmental monitoring to meet the requirements of Article 4(13) would entail a considerable amount of work and possibly entail costs similar to those of applying Articles 4(11) and 4(12) directly.

The SBA notes that it would be difficult to apply the exemption, based on the requirement of a lack of alternatives. The Swedish Board of Agriculture's preliminary assessment is that there are no obstacles to the use of Article 4(11) and (12) and thus considers that it will be difficult to apply Article 4(13).

## The Swedish Forest Agency

The Swedish Forest Agency's (SFA) preliminary interpretation<sup>20</sup> is that forestry in form of clear-cutting with general environmental consideration in a forest area that constitutes a habitat type normally entails a considerable deterioration. This applies to all habitat types and regardless of whether the habitat type area is in good condition or not.

The SFA notes that a compensation system needs to be in place for Article 4(13) to apply. No date is specified for when the compensation system will be in operation, but probably a system of compensation must be in place at the time when compensatory measures need to be put in place.

The SFA, like the other authorities, takes the view that the monitoring under article 20(1) point (j) should start as soon as the notification under Article 4(13) has been submitted to the Commission, i.e. no later than 19 February 2025.

## Our conclusions on the applicability of Article 4(13) in Sweden

All Swedish competent authorities raise serious objections to applying the derogation in Article 4(13) of the NRL. The Swedish Environmental Protection Agency, the Swedish Agency for Marine and Water Management, the Swedish Board of Agriculture and the Swedish Forest Agency have all stated that the basic conditions for applying the exemption are not met by Sweden. Sweden does not meet requirements for monitoring, compensatory measures and reporting. In addition, even though a lack of alternatives is a prerequisite to applying the derogation in article 4(13), neither the government nor the competent authorities have investigated if such alternatives exist.

We share the authorities' objections and concerns. We note that the EU commission, in a letter to the environmental attachés, has clearly stated that the implementation of Article 4(13) should be applied in a focused and restrictive way for each habitat type and each habitat of species<sup>21</sup>. Furthermore, it is the stated view of the Commission that monitoring under Article 20(1) point (j) should be initiated as soon as the notification is submitted.

We find it obvious that Sweden does not meet any of the requirements for applying the derogation. Applying the derogation without having a system for monitoring, compensation measures and reporting entails a considerable risk that the overall purpose of the NRL will be undermined. This means that there is already an imminent risk that Sweden will not meet the requirements for restoration, compensation, monitoring and reporting in the regulation.

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<sup>20</sup> See Appendix 4

<sup>21</sup> European commission 2025. Further clarifications on the notification procedure in accordance with Article 4(13) of Regulation (EU) 2024/1991 on nature restoration and amending Regulation (EU) 2022/869



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If left unchecked, we fear that the application of the derogation would render the non-deterioration requirement ineffective in Sweden. We therefore call on the European Commission to urgently follow up on, and question, the Swedish notification.

If you have any questions, please contact:

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## Appendices:

Documents related to the Swedish implementation of the Nature Restoration Law that are not published on the web:

**Appendix 1:** Naturvårdsverket 2024. Bilaga 2 till Beslut om Redovisning av RU Översyn av referensarealer för livsmiljötyper

**Appendix 2:** Jordbruksverket 2025. Analys av undantaget i artikel 4.13 i naturrestaureringsförordningen

**Appendix 3:** Naturvårdsverket 2025. Svar på beställning angående artikel 4.13 i EU:s förordning om restaurering av natur, om att uppfylla icke-försämringskraven utanför Natura 2000 per biogeografisk region och inte per område

**Appendix 4:** Skogsstyrelsen 2025. PM till Regeringskansliet – underlag avseende artikel 4:13 i EU:s förordning om restaurering av natur