

5 December 2025

Vice-President Virkkunen  
High Representative Kallas  
Commissioner Dombrovskis  
Commissioner Kubilius  
Commissioner Roswall  
Commissioner Jørgensen  
Commissioner Hansen  
Commissioner Várhelyi  
European Commission

### **Letter of Nordic and Baltic farmers on simplification omnibus packages**

Nordic and Baltic Farmers and Forest Owners Organizations call for real simplification, better regulation and legal certainty for the agricultural and forestry sectors in the upcoming omnibus initiatives.

We need genuine simplification to ensure a viable future for European farmers, agri-cooperatives and forest owners. The upcoming omnibus packages must reduce administrative burdens at the farm-level, streamline regulatory rules to enable long-term planning, and reduce uncertainties across all aspects, including legal frameworks. The Commission must urgently reduce existing burdens and prevent new ones from emerging to enhance competitiveness and resilience in our sectors. We need to produce more, not less, to reach EU goals on climate and competitiveness. Simplification at the farm level and for private forest owners is key for the EU to deliver real competitiveness for our sectors.

The European farming sector has published detailed and targeted simplification proposals in Copa-Cogeca paper 31.7.2025 on Health and Food Safety, Environment and Cross-cutting (horizontal) matters.

Nordic and Baltic Farmers and Forest Owners' Organisations support the abovementioned Copa-Cogeca proposals and would especially highlight the following proposals to be included in the omnibus packages and related initiatives:

- **Plant protection products (PPP): approvals, mutual recognition and precision technologies**

We support faster procedures for the approval/ certification of new PPP's as long as the PPPs arriving to the market are safe, effective and affordable (irrespective of their nature) together with the implementation of the principle of no more ban on existing PPPs without viable -safe, effective, and affordable- alternatives.

A more efficient and predictable mutual recognition system is needed, especially between Member States with similar climatic and agronomic conditions and comparable pest and disease pressures. Support for minor uses should be strengthened, alongside with clear and harmonised rules for seed treatments and data protection.

Precision technologies, including drone-based applications, should be enabled under proportionate, harmonised EU rules that promote innovation and improve environmental performance.

- **Nature Restoration Regulation:**

The Nature Restoration Regulation (Regulation (EU) 2024/1991) should be re-opened and amended to achieve a practical level of ambition in relation to the targets, on the one hand, and to streamline the implementation of the Regulation in terms of ensuring an equitable uptake of voluntary measures that will not threaten food production, resources, hydric security or strategic sectors within the EU. Critically, the deadline for the Nature Restoration Plans (NRP) must be delayed by 1 year. It is necessary to allow Member States to undertake thorough stakeholder consultation and develop plans that work with farmers and forest owners, rather than rushed top-down exercises.

The Commission's report to the European Parliament and Council on Nature Restoration Law (NRL) implementation, financing, and funding needs, due by August 2026, will be a critical milestone. Ensuring adequate financial resources is essential for making the Regulation workable.

A screening of disproportionate and contradictory legal effects on permits and land use decisions should be conducted, particularly in relation to the Habitats Directive. In the application of the Regulation, a fundamental question remains unresolved due to the need for proper conditions for investments to be established. In fact, without the necessary resources, the Regulation will be impossible to implement in practice.

- **Habitats Directive**

Implementation of Habitats and Birds Directives Under the Habitats Directive (Directive 92/43/EEC), assessment methodologies for conservation status have been criticized for methodological biases. Due to these shortcomings, the reports submitted every six years on the implementation of the Directive often do not reflect the actual condition of habitats. Peer-reviewed international literature<sup>1</sup> indicates that current methods can portray well-managed habitats in an unduly negative light. We therefore call on the Commission to review and improve habitat assessment methodologies so that they accurately reflect real conditions and management practices, recognizing the contribution of active, sustainable forest and land management to conservation outcomes.

For both the Habitats Directive and the Birds Directive, practical implementation must be clarified and made proportionate. Recent legal interpretations in the EU have shown that unclear definitions of terms such as "deliberate disturbance" during the bird nesting season can lead to disproportionate restrictions not only for forestry but also for agricultural land management. A broad interpretation of disturbance risks limits essential farming and forestry activities for long periods of the year, creating significant legal and economic uncertainty. In some Member States, this could lead to operational standstills during peak vegetation periods.

The omnibus must ensure updated, science-based and economically reasonable implementation rules that balance species protection with the continuity of sustainable land management.

- **Maximum Residue Levels (MRLs) and feed security**

Changes to MRLs can have far-reaching consequences for the availability, price, and security of feed imports. For the Nordic and Baltic livestock sectors, predictable access to safe and affordable feed

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<sup>1</sup> Article on EU forest habitats, Mauser, Bou Dagher Kharrat and Muys, "When good forests look bad: methodological biases in EU conservation status reports", URL:

<https://www.sciencedirect.com/science/article/pii/S0006320725006470>

materials is essential to maintaining production stability and competitiveness. Therefore, any MRL adjustments must be based on transparent scientific assessments and proportionate risk management, include adequate transition periods for operators and clear guidance for supply chains and take into account the cumulative effects of multiple regulatory changes on feed availability and livestock competitiveness.

- **Nitrates Directive (Council Directive 91/676/EEC)**

The Nitrates Directive remains important for water protection, but several provisions impose costs and administrative burdens that do not correspond to real environmental risk. At the same time, regulatory barriers hinder the adoption of innovative solutions that could further reduce nutrient losses and improve the efficiency of manure management.

Targeted amendments in the omnibus are therefore necessary, while maintaining the Directive's core objectives.

The Directive should be updated to reflect developments not foreseen at its adoption, including climate-driven changes in water flow and catchment dynamics. Rigid, date-based "calendar farming" rules should be replaced with requirements based on real soil, crop and weather conditions. Flexibility in the nitrogen from animal manure limit should be allowed where supported by agronomic evidence, precision technologies and monitoring. The definition of livestock manure should be modernized to clearly include manure-derived products such as digestate and recovered nitrogen fertilizers (e.g. RENURE), under appropriate environmental safeguards. The regulatory barriers that prevent the use of innovative manure processing and nutrient-recycling technologies should be removed.

We also remind that the following legislation/Initiatives under discussion will have foreseeable impacts on our sectors and should be modified according to the requests from the agriculture and forestry sectors.

- **Deforestation Regulation (EUDR) implementation**

The EUDR (Regulation (EU) 2023/1115) will have significant impacts on forest-rich and export-oriented Member States. We call for the postponement of full implementation and the design of effective and coherent simplification measures, in particular for low-risk countries. The key simplification measures need to include the removal of redundant or overlapping requirements with other legislation, the reduction of unintended administrative burden to improve efficiency, and ensuring that all operators, specifically SMEs, are not disproportionately affected by EUDR reporting requirements.

- **Carbon Border Adjustment Mechanism (CBAM) implementation**

The current design of CBAM (Regulation (EU) 2023/956) risks increasing fertiliser costs and price volatility for EU farmers, undermining food security and competitiveness.

We therefore propose that CBAM implementation should be adjusted to:

- a. Ensure price predictability at the time of import and invoicing.
- b. Suspend CBAM obligations for fertilisers.
- c. Establish a CBAM refund mechanism for EU exporters of agricultural products to protect their position in global markets.
- d. Compensate European farmers with CBAM funds for higher fertiliser costs.

- **Carbon Removal and Carbon Farming Certification (CRCF)**

While we support the development of a credible, transparent EU-wide certification framework, we remain concerned about the current design of the CRCF. Natural forest growth and long-established sustainable practices are often not considered “additional”, structurally disadvantaging forest-rich and peat-rich Member States.

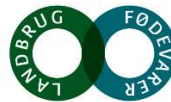
Proposed methodologies risk incentivizing reduced harvesting or land-use constraints, harming the bioeconomy and rural employment. Furthermore, the lack of mature, cost-effective methodologies for organic and drained soils, combined with heavy Monitoring, Reporting and Verification (MRV) and administrative requirements, may exclude many farmers and forest owners from participating.

To ensure fairness and uptake, the CRCF must avoid unintended economic or regional disparities, prevent double-counting with Land Use, Land-Use Change and Forestry (LULUCF) obligations, and provide proportionate, science-based and economically viable rules that work across all climatic zones.

We remain strongly committed to the EU’s climate and biodiversity objectives and to a strong, competitive and sustainable European agriculture and forestry sector. But to achieve this, our sectors need **clear, proportionate and predictable rules**, and genuine simplification that farmers and forest owners can experience in their daily operations.

We rely on your leadership to ensure that the upcoming omnibus initiatives and related legislative processes deliver these outcomes.

Yours sincerely,



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