

To: Guðmundur Ingi Guðbrandsson
Minister for the Environment and Natural Resources
Ministry for the Environment and Natural Resources
Skuggasundi 1 – 3, 101 Reykjavík

Subject: Adverse biodiversity impacts of the draft Icelandic nation-wide plan for forestry

17 June 2021, Cambridge

Dear Minister,

We, the undersigned representatives of BirdLife International and its national partners from countries which share migratory waterbirds breeding in Iceland, write to you to express our strong concern regarding the draft national Forestry Plan currently being considered by your Ministry. In its current form, it risks causing serious damage to a number of the breeding waterbird populations shared by our nations.

We strongly believe that the current draft of the forest plan is in breach of Iceland's commitments under the Biodiversity Convention (CBD), Ramsar Convention, Bern Convention and African-Eurasian Migratory Waterbird Agreement (AEWA), because of its seriously adverse effects on several of Iceland's globally important waterbird populations. In particular, it fails to take into account the 2016 recommendations of AEWA and the Bern Convention (BC) regarding afforestation policy, in the ways outlined in the attached review.

BirdLife recognises the benefits that afforestation can bring, but trees need to be the right – usually native – species, planted in the right places. The waterbird populations that breed in the Icelandic lowlands are second only to Russia in their international importance to the East Atlantic Flyway. Together with your breeding seabirds, these are probably Iceland's greatest contribution to the planet's biodiversity natural heritage. Research in Iceland and beyond shows that planting of the wrong trees in the wrong places can have disproportionately large impacts on breeding waterbird populations due to displacement and increased predation.

Iceland has a very important responsibility and role to play in the conservation of your outstandingly important breeding migratory waterbird populations, not only in your own country, but also in several other countries, which host these birds during the non-breeding months after they have left your shores. The Icelandic Forestry Plan in its current form would undermine the conservation actions that many countries are taking for your birds, for example when they are congregated at Important Bird Areas further south in Europe and Africa.

Iceland is renowned globally as a natural paradise and an environmental frontrunner, attracting tourists accordingly to experience its wide-open landscapes. The current draft Forestry Plan would undermine this unique selling point.

The BirdLife Partnership strongly urges that the draft Icelandic National Forestry Plan is revised in line with the recommendations of AEWA and the Bern Convention, with implementation properly enforced to ensure compliance with Iceland's international commitments on biodiversity conservation and restoration.

Yours sincerely,



Patricia Zurita
Chief Executive Officer
BirdLife International

Co-signatories from:

#	Name, Title, Organization	Signature
1.	Phillipe Funcken Director General Natagora BirdLife in Belgium	
2.	Kjetil Aa.Solbakken Secretary General Norsk Ornitologisk Forening (NOF) BirdLife in Norway	
3.	Mark Anderson Chief Executive Officer BirdLife South Africa BirdLife in South Africa	
4.	Mamadou Diawara Executive Director Guinée Ecologie Republic of Guinea	
5.	Danilo Selvaggi Chief Executive Officer Lega Italiana Protezione Uccelli (LIPU) BirdLife in Italy	
6.	Julia Pierini Chief Executive Officer BirdLife Zimbabwe BirdLife in Zimbabwe	
7.	Idrissa Jean-Yves Zeba Chief Executive Officer NATURAMA BirdLife in Burkina Faso	

8. Keith Bensusan
General Secretary
Gibraltar Ornithological and Natural History Society
BirdLife in Gibraltar

9. Beccy Speight
Chief Executive Officer
Royal Society for the Protection of Birds (RSPB)
BirdLife in the UK

10. Niall Hatch
Officer in Charge
BirdWatch Ireland
BirdLife in Ireland

11. Claudia Feltrup-Azafaf
Executive Director
Association Les Amis des Oiseaux (AAO)
BirdLife in Tunisia

12. Raffael Ayé
Director
SVS/BirdLife Switzerland
BirdLife in Switzerland

13. Sheku Kamara
Executive Director
Conservation Society of Sierra Leone (CSSL)
BirdLife in Sierra Leone

14. Dr. Damijan Denac
Chief Executive Officer
Društvo Za Opazovanje In Proučevanje Ptice Slovenije
(DOPPS)
BirdLife in Slovenia

15. Kaarel Võhandu
Chief Executive Officer
Estonian Ornithological Society BirdLife in Estonia



16. Francisco Gomes Wambar
Chief Executive Officer
Organização para a Defesa e Desenvolvimento das Zonas
Húmidas na Guiné-Bissau (ODZH)
Guinea-Bissau



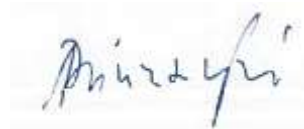
17. Fred Wouters
Chief Executive Officer
Vogelbescherming Nederland
BirdLife in the Netherlands



18. Sigrid Andersen
Chief Executive Officer
Dansk Ornitologisk Forening (DOF)
BirdLife in Denmark



19. Alexandre Vintchevski
Chief Executive Officer
APB
BirdLife in Belarus



20. Narcisse Tehe
Executive Director
SOS-Forêts
BirdLife in Côte d'Ivoire



21. Dr Jaime Garcia Moreno,
Chair BirdLife East Atlantic Flyway Initiative Task Force
Vogelbescherming Nederland
BirdLife in the Netherlands



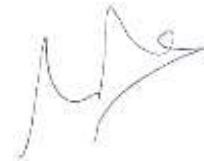
22. Dr Khadija Bourass
Executive Director
Groupe de Recherche pour la Protection des Oiseaux au
Maroc (GREPOM)
BirdLife in Morocco



23. Eric Lartey
Executive Director
Ghana Wildlife Society
BirdLife in Ghana



24. Asunción Ruiz Guijosa
Chief Executive Officer
SEO BirdLife
BirdLife in Spain



25. Dr Muhtari Aminu-Kano
Director General/Chief Executive Officer
Nigerian Conservation Foundation
BirdLife in Nigeria



26. Dr Domingos Leitão
Executive Director
Sociedade Portuguesa para o Estudo das Aves (SPEA)
BirdLife in Portugal



27. Zdeněk Vermouzek
Director
Czech Society for Ornithology (CSO)
BirdLife in Czech Republic



28. Miroslav Demko
Director
Slovak Ornithological Society (SOS)
BirdLife in Slovakia



29. Motshereganyi Kootsositse
Chief Executive Officer
BirdLife Botswana
BirdLife in Botswana



30. Izabela Wilczyńska-Gadi
Chief Executive Officer
Ogólnopolskie Towarzystwo Ochrony Ptaków (OTOP)
BirdLife in Poland

Izabela Gadi

31. Viesturs Kerus
Chief Executive Officer
Latvian Ornithological Society (LOB)
BirdLife in Latvia

Viesturs Kerus

32. Mouhamadou Aliou Bah
Executive Director
Nature-Communautés-Développement (NCD)
Senegal

Mouhamadou Aliou Bah

33. Imakando Crispin Sinyama Board Chair
BirdWatch Zambia
BirdLife in Zambia

Imakando Crispin Sinyama

34. Iamin Jobaate
Executive Director
West African Bird Study Association (WABSA)
The Gambia



35. Aki Arkiomaa
Chief Executive Officer
BirdLife Finland
BirdLife in Finland

Aki Arkiomaa

36. Mark Sultana
Chief Executive Officer
Birdlife Malta
BirdLife in Malta

Mark Sultana

37. Djibril Diallo
Directeur Exécutif
Nature Mauritanie
BirdLife in Mauritania



38. Lotta Berg
Chief Executive Officer
BirdLife Sverige
BirdLife in Sweden