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Cepi feedback for roadmap on the new EU strategy for forests

Cepi encourages the European Commission to timely publish a new Forest Strategy that covers the entire forest and forest-based sector and promotes the many services forests provide. This would be an important contribution to the priorities of the European Green Deal and the international commitments of the EU. The upcoming strategy needs to look beyond forests and forestry (as well as beyond forest sink and biodiversity). Only in this way would it reflect the reality of the entire forest-based value chain in a comprehensive and proportionate manner. This is crucial in order to avoid unfair loopholes in other sectors' decarbonisation requirements¹ and in order to strongly reduce use of fossil resources.

The roadmap does not highlight sufficiently that products made of renewable forest-based raw materials replace carbon-intensive fossil-based products in various sectors. Forests and forest-based products provide readily available and efficient solutions to climate change mitigation and adaptation and, by doing so, contribute to the targets set in the Green Deal.

There are more synergies between sustainable forest management and benefits from resulting products and services than occasional and local tradeoffs in forests. Sustainable forest management is a long-term engagement reinforced by EU and national forest and nature legislation as well as voluntary systems and certification (i.e. FSC and PEFC). Sustainable forest management is also the best way to address the different and growing expectations on forests to deliver on a variety of societal challenges.

Forest specific measures contributing to the objectives of the Green Deal must be developed by the Standing Forestry Committee with a mandate from the EU Forest Strategy. This would reflect the complex competence division between the EU and the Member States and the subsidiarity principle. Member States are competent on forest policy, while the EU has the competence in sectorial policies in the field of e.g. environment and energy. The mandate for the Standing Forestry Committee should include the development of guidelines on afforestation and reforestation as well as closer to nature forestry. Other forest ecosystem relevant initiatives announced in the EU Biodiversity Strategy, such as aims to define, map and monitor the old growth forests, should be directed to further elaboration of the EU Forest Strategy in order to take into account the Council

¹ <https://www.cepi.org/article-the-eu-forest-based-value-chain-a-strategic-resource-for-a-sustainable-future/>

Conclusions² request to create well-managed protected areas and reflect evidence and science-based information.

Forests and the forest-based sector provide tangible solutions to climate change mitigation and adaptation³. Climate change is weakening the resilience of forest ecosystems, causing emerging amounts of natural disturbances such as forest fires, pests, drought, erosion and floods. Disturbances vary locally thus the solutions need to be adapted to by local measures, which in sum contribute to the Green Deal objectives.

The development of the non-end use specific sustainability approach by Member States' forestry experts should be continued with a mandate from the Forest Strategy.

The European risk-based approach and sustainability criteria for forest management adopted in the recast of the Renewable Energy Directive should be established as a sustainability system for forest biomass, independent of the end-use. The Strategy should give a mandate to the Standing Forestry Committee to establish it. The approach should then be used in different sectorial policies that include sustainability criteria for forestry to enhance consistence across different policies. The EU Forest Strategy should guide relevant EU policies in applying the system, as appropriate. This two-step approach to minimise the risk of using unsustainable forest biomass respects national characteristics and the complex competence division of Member States and the EU as it comes to forests and forestry. The latter was also requested by the European Parliament in its resolution on the European Forest Strategy – the Way Forward⁴

Consequently, the new EU Forest Strategy should encourage the European Commission to conduct fitness checks of the EU legislations. Consequently, contradicting policies hindering the development of the sector would be reviewed and possibly revised. This is crucial in order to enhance overall consistence and coherence of forest-related EU policies.

The 2050 climate neutrality target requires an ambitious shift towards wood-based circular economy and the continuous flow of forest-based raw materials, in particular wood from sustainably-managed forests. Sustainable forest management remains the core principle to enhance overall sustainability and has a direct contribution to sustainable development. There is an untapped potential to further enhance and increase sustainable domestic wood mobilisation via active and timely forest management. This would benefit the climate without hampering the environmental sustainability of forests in and outside the Union. Cepi would welcome the initiatives that aim at increasing forest cover in Europe alongside enhanced support for sustainable and active forest management. Maximising this potential also creates social benefits, which are urgently needed to level out the increasing inequalities between cities and the countryside as well as between countries.

² [Conclusions on Biodiversity – the need for urgent action](#)

³ Holmgren, P. (2020): [Climate effects of the forest-based sector in the European Union](#)

⁴ European Parliament [Resolution of 8 October on the European Forest Strategy – the Way Forward \(2019/2157\(INI\)\)](#)

The forest sector stakeholders need to be at the core of the Strategy with a strong bottom-up approach. In the long-term, fostered cooperation on forestry could be enhanced via the establishment of e.g. pilot projects or preparatory actions to further develop existing networks such as the Standing Forestry Committee and Civil Dialogue Group on Forestry and Cork. These pilots or actions would improve knowledge on the possible impacts of strategic decisions affecting forests and the forest-based sector.

For further information, please see Cepi's position paper entitled "enhancing the EU forest policy framework through a stronger EU forest strategy post-2020" at: <https://www.cepi.org/enhancing-the-eu-forest-policy-framework-through-a-stronger-eu-forest-strategy-post-2020/>