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Cepi's response to the public consultation on EU Biodiversity policy initiatives

A [public consultation](#) on EU Biodiversity policy initiatives, opened by the European Commission, allowed relevant stakeholders to evaluate the EU Biodiversity Strategy to 2020 as well as provide feedback on the development of legally binding EU Nature Restoration Targets; a key commitment of the EU Biodiversity Strategy 2030.

Cepi used this opportunity to provide answers to the questionnaire and to share its views. Our input can be summarised as follows:

Cepi acknowledges that the EU Biodiversity Strategy to 2020 was successful in demonstrating that sustainable forest management considers as well as enhances prospects for biodiversity in managed forest land and plays a critical role in biodiversity in forest ecosystems. Voluntary tools and programs have shown to be working in enhancing biodiversity in forest ecosystems. Furthermore, national forest and nature legislation and voluntary systems such as forest certification ensure that forest ecosystems are not in a critical condition.

However, one of the shortcomings in the implementation of the strategy concerns insufficient emphasis on the importance of non-binding EU tools to consider local characteristics of forest ecosystems.

Additionally, certain issues should be addressed regarding the EU Nature Restoration Targets, which serve as an integral part of the EU Nature Restoration Plan, under the Biodiversity Strategy 2030.

The scope of the policy should be limited to areas degraded by natural disturbances

The scope of restoring degraded ecosystems should be limited to nature restoration in areas degraded by natural disturbances, when it comes to managed forest land, as this would facilitate the recovery of resilient forest ecosystems. Having a specific restoration target for forests would otherwise lead to unwanted consequences regarding positive developments in forest resources in terms of quantity and long-term quality.

EU Restoration initiative should utilise the expertise of the Standing Forest Committee (SFC)

Making use of the expertise of the SFC as well as developing the approach under the auspices of the upcoming EU Forest Strategy would be crucial to ensuring an enabling policy framework for healthy forests and a viable and an innovative forest-based sector. The further development of a circular bioeconomy is dependent on both active and sustainable forest management. Sustainable sourcing can be seen through voluntary tools such as FSC and PEFC certification schemes.

Local specificities and geoclimatic conditions need to be considered

As mentioned before, with regard to the EU Biodiversity Strategy to 2020; local specificities and geoclimatic conditions need to be taken into account due to varying forest resources, ownership structures as well as conditions across Member States.

For further information, please refer to: Ulrich Leberle Raw Materials Director at u.leberle@cepi.org

Cepi is the European association representing the paper industry. We offer a wide range of renewable and recyclable wood-based fibre solutions to EU citizens: from packaging to textile, hygiene and tissue products, printing and graphic papers as well as speciality papers, but also bio-chemicals for food and pharmaceuticals, bio-composites and bioenergy. We are a responsible industry: 92% of our raw materials are sourced in Europe and certified as sustainable, 91% of the water we use is returned in good condition to the environment. We are the world champion in recycling at the rate of 72%. At the forefront of the decarbonisation and industrial transformation of our economy, we embrace digitalisation and bring 20 billion value addition to the European economy and €5.5 billion investments annually. Through its 18 national associations, Cepi gathers 500 companies operating 895 mills across Europe and directly employing more than 180,000 people.
