Public consultation on a new EU forest strategy

Fields marked with * are mandatory.

Introduction

The Commission’s December 2019 Communication on the European Green Deal set out an ambitious vision of the EU becoming a sustainable, climate-neutral economy by 2050. It also announced that, building on the EU’s 2030 biodiversity strategy, the Commission would prepare a new EU forest strategy covering the whole forest cycle and promoting the many services that forests provide. The key objectives of the strategy would be effective afforestation and forest preservation and restoration in the EU, to help increase the absorption of CO2, reduce the incidence and extent of forest fires and other risks, and promote the bioeconomy in ways that fully uphold ecological principles and are conducive to biodiversity.

The EU forest strategy will enable the forest sector to contribute to the new Commission priority of building a new growth model through the European Green Deal, including support for rural areas. Many EU policies are relevant to forests, so there is a need for a comprehensive strategy to ensure a consistent approach.

The strategy will also help the EU to meet its international commitments and will form the basis of a clearly established, consistent and holistic approach on forests, allowing stronger EU leadership internationally (in the context of the UN 2030 sustainability agenda, the Paris Agreement, the Convention on Biological Diversity and the Convention to Combat Desertification). The 2019 Communication on Stepping up EU action to protect and restore the world’s forests established a framework for the EU’s global action; this must be properly and consistently reflected in the formulation of domestic policies.

Through this public consultation, we invite citizens and organisations to contribute to the preparation of the new EU forest strategy and share their views on potential objectives and actions.

The consultation seeks stakeholders’ input on challenges and opportunities as regards our forests, in particular in relation to the climate, biodiversity, rural areas and socio-economic welfare, disaster risk management, EU support instruments, forest-based industry, the EU’s global leadership and its target of planting 3 billion trees by 2030.

The consultation will focus on EU territory, thereby complementing the results of the Eurobarometer survey on the current role and benefits of the EU’s forests and the activities set out in the Communication on Stepping up EU action to protect and restore the world’s forests.

Other public consultations are taking place in parallel on ‘land use, land-use change and forestry — review of EU rules’ and the new EU soil strategy.
Guidance on the questionnaire

This consultation consists of some introductory questions as regards your profile, followed by a questionnaire in two parts. Please note that you can choose to fill in only the first part and are not obliged to respond to all questions in the questionnaire.

The first part of the questionnaire is aimed at gathering views and information from all citizens and organisations interested in the new forest strategy and European forests.

The second part also targets all citizens and organisations, but contains more detailed questions by area. This part is completely optional and you may choose not to answer it at all or only selected sections.

At the end of the questionnaire, you are invited to provide any additional comments, documents and position papers, expand on relevant issues not covered by the questions and give any general feedback you may have on the survey itself.

About you

* Language of my contribution
  - Bulgarian
  - Croatian
  - Czech
  - Danish
  - Dutch
  - English
  - Estonian
  - Finnish
  - French
  - German
  - Greek
  - Hungarian
  - Irish
  - Italian
  - Latvian
  - Lithuanian
  - Maltese
  - Polish
  - Portuguese
  - Romanian
I am giving my contribution as
- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

First name

Meri

Surname

Siljama

Email (this won't be published)

m.siljama@cepi.org

Organisation name

Confederation of European Paper Industries (Cepi)

Organisation size
- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum
Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

72279144480-58

* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, ‘business association, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.

Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected.

*Please indicate the sector(s) in which you are active as an individual or an organisation:

*between 1 and 3 choices

- [ ] agriculture and/or agricultural commodities
- [ ] biodiversity and/or environment
- [ ] climate change
- [ ] disaster risk management
- [ ] energy
- [ ] tree nursery
- [x] forestry
- [ ] hunting
- [x] forest-based industry
- [ ] other industry (e.g. construction)
- [ ] forest certification
- [ ] health
- [ ] tourism
- [ ] IT and digitalisation
- [ ] human and/or labour rights
- [ ] investment and finance
- [ ] media and communication
- [ ] urban/or other land planning and development
other (please specify in the comments box below)

comments

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.

• Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

● Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

● Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

✓ I agree with the personal data protection provisions
PART 1

Your views on potential objectives and actions of the new EU forest strategy

In its roadmap on the new EU forest strategy, the Commission set out a number of specific potential objectives and actions which the strategy could address. This section aims to obtain quantitative feedback on these objectives and actions, in order to determine public preferences and additional suggestions.

Please rate the relative importance of the following objectives and actions for the new EU forest strategy:

To nurture the forests that we have the new EU forest strategy should …

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<tr>
<td>…enhance forest protection and restoration to meet the EU biodiversity and climate objectives, and reduce the loss of forest coverage, while strictly protecting all remaining EU primary and old-growth forests</td>
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<td>…preserve stocks and increase the EU carbon sinks in forests, their soils and harvested wood products</td>
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<td>…enhance prevention of disaster risk events and of damages, and secure forest resilience to incidence and extent of fires and other natural hazards, and secure forest health with a view to changing climatic conditions and environmental degradation</td>
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<td>…support restoration of damaged areas and degraded ecosystems, taking into account projected climate conditions</td>
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<td>…ensure the sustainable management of all EU forests, maximising the provision of their multiple functions while enhancing their productive capacity</td>
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<td>other (please specify in the comments box below)</td>
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It would be crucial that the new EU forest strategy provides guidance to the other forest-related provisions in different EU policies, ensuring consistent and holistic approach to forests and their management. This would contribute to the enhancement of active and sustainable forest management in the EU and promote the further development of the circular bioeconomy. It would also contribute to the provision of stable and predictable policy framework for the much needed investments in the sector.

The strategy should continue the halted establishment of a non-end-use sustainability approach as regards forests. It would be essential that demonstration of sustainable forest management in the EU would be the same for different outlets such as for bioenergy, financial instruments or sustainable forest fibre-based products. The approach should be developed under the umbrella of the strategy and as completed it should be embedded in the different policy frameworks to ensure consistency of these policies as it comes to forests and their management. The approach should respect the complex competence division of forest management between the member states and the EU and highlight the importance of subsidiarity.

In addition, in order to tap into full potential of forests, the strategy should encompass the entire forest-based value chain and strive balance and seek synergies between economic, ecologic and social functions. Economic importance of forests should not be overlooked in the framework of climate and biodiversity policies. As regards climate benefits of forests and the forest-based sector, CO2 sequestration, carbon storage in forest-based products and substitution of fossil-based raw materials and energy should be equally emphasised. Solid focus on the sink function bears a risk that decarbonisation efforts in sectors outside forests will be weakened. Moreover, due to the uncertainties in carbon accounting and reporting in the LULUCF sector, climate change mitigation efforts should not only rely on the sink which is vulnerable to e.g. natural disturbances.

Furthermore, to genuinely build the future EU forest strategy inline with wider biodiversity and climate ambitions of the EU. All forest-ecosystem related provisions should be continued to be discussed and finalised under the EU forest strategy. Important guidelines on biodiversity friendly afforestation and reforestation as well as closer to nature forestry, are clearly linked to forests and their management and therefore should be further developed under the respective strategy.

To plan for the forests of the future, the new EU forest strategy should foster…

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<td><strong>…afforestation and tree planting by setting out a roadmap for planting at least three billion additional trees in the EU by 2030, as announced in the Biodiversity Strategy for 2030, in full respect of ecological principles, contributing to climate neutrality, the circular economy and biodiversity</strong></td>
<td>![very important]</td>
<td>![important]</td>
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<tr>
<td><strong>…adaptation of forests to climate change and strengthening their resilience to face future challenges, including through enhanced conservation and use of the genetic diversity of trees</strong></td>
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- new training, skills and jobs that reflects the multiple functions of forests
- rural development, including local enterprises and value chains, tapping on forests’ multiple functions
- innovative forest-based services and products with low environmental impact, replacing carbon-intensive counterparts
- a strong research and innovation agenda to improve our knowledge of forests and to optimise their composition, structure, management and use, including for the bioeconomy

other (please specify in the comments box below)

**comments**

Adaptation of forest to climate change is highly important, however it should be done through active and sustainable forest management instead of through enhanced conservation. Adaptation through conservation bears a risk of spreading e.g. pests, insect outbreaks.

To manage existing and new forests, it will be important for the new EU forest strategy to...

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<th><em>...have a strong and inclusive governance framework engaging all relevant parties</em></th>
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| *...foster a stronger coordination between national forest policies and the European Green Deal’s objectives* |  |  |  |  |  |

| *...improve and harmonise the monitoring of forests to demonstrate the effective contribution of sustainably managed forests to the EU objectives, and of the supply and demand of forest services* |  |  |  |  |  |

| *...secure financing, including for research, enhancing the use of EU and national budget, as well as private funds, ensuring a consistent approach among* |  |  |  |  |  |
Keeping in mind the complex competence division on forests and forestry, and likelihood that the EU policy initiatives impacting forests and the forest-based sector are projected to increase in the near future, increased policy coordination via the new EU forest strategy is a must. It is therefore crucial that the increased EU policy coordination is ensured by a strategy that secures a balanced and holistic approach to forests, guided by the principle of sustainable forest management (Forest Europe, H1 resolution).

As regards carbon farming it would be vital to fully understand the concept and its consequences for forests and the forest-based sector. Therefore research and innovation play a key role as well as impact assessments of any possible policy measures. Possible measures for payments of ecosystem services should focus on incentivise CO2 sequestration without hampering wood availability. Otherwise the there is a risk that the overall climate benefits of forests and the forest-based sector remain unreached. For further information, please see at https://www.cepi.org/cepi-study-climate-effects-of-the-forest-based-sector-in-the-european-union/

### PART 2

**Optional questions on various forest aspects** (you may choose not to answer all of them)
### THREATS AND CHALLENGES FOR EU FORESTS

**Q1** Please rate the following threats and challenges for forests in Europe

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<th>Threat/Challenge</th>
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<th>Slightly Important</th>
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<td>Current levels of natural disasters and extreme events (e.g. forest fires, droughts, storms)</td>
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<td>Projected risks for forests due to climate change (e.g. natural disasters and extreme events, and slow onset effects such as shifts in bioclimatic zones, precipitation, soil erosion)</td>
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<td>Pests and diseases affecting trees</td>
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<td>Vulnerability of monospecific plantations and stands</td>
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<td>Loss of biodiversity and of high conservation value forests, and ecosystem degradation</td>
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<td>Invasive alien species (invasive alien species’ means a species introduced outside its natural range that might survive and subsequently reproduce, whose introduction or spread has been found to threaten or adversely impact biodiversity and related ecosystem services)</td>
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<td>Forest loss (i.e. deforestation) and forest fragmentation due to infrastructure development, urbanisation, etc.</td>
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<td>Lack of, or poor, management planning failing to take account of all services that forests provide</td>
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<td>Un Sustainable forest management practices (e.g. large-scale clear cuts, harvesting damage, soil compaction, excessive use of pesticides/herbicides)</td>
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<td>Illegal logging</td>
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<td>Unbalanced local game populations, causing damage to forests</td>
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</table>
Climate change is the biggest threat for forests in Europe. In addition, scattered and uncoordinated EU policy framework is also causing challenges for forests in Europe. Forest-related provisions in other sector's legislations should ensure consistent approach to the sustainable use of natural resources in Europe. Sustainable forest management should strive balance between all functions (economic, social and ecological) of forests as defined in Helsinki Resolution of the FOREST EUROPE process. Moreover, restrictive approach to forest management might lead to unintended consequences to the other parts of the world. The recent working paper of Thünen Institute entitled "Assessment of possible leakage effects of implementing EU COM proposals for the EU Biodiversity Strategy on forestry and forests in non-EU countries" must be taken into account when developing the new EU forest strategy. The strategy cannot only focus on the impacts of the actions within and outside Europe. For further information, please refer to https://literatur.thuenen.de/digbib_extern/dn062850.pdf

Moreover, forest management is addressed via different EU and national legislations and voluntary systems in place. These frameworks ensure sustainability of forestry in the EU and tools such as EU Timber Regulation efficiently prohibits the entry of illigal wood in the EU markets.

FORESTS FOR SOCIAL AND ECONOMIC WELFARE IN RURAL AREAS

Many people depend on forests for their livelihoods, and many forest owners/managers, rural communities and farmers get part of their income from forests.

Q2 What should be done, in your opinion, to ensure that forests continue to provide rural communities with livelihoods and income?
| expand the economic and social opportunities that forests offer to rural communities |   |   |   |   |   |
| provide financial incentives for forest adaptation to climate change, and for strengthening forest resilience and carbon sequestration |   |   |   |   |   |
| provide financial incentives for forest biodiversity protection and forest restoration, e.g. payments for ecosystem services [e.g. water cleaning, floods and landslide protection, soil erosion control, cooling of cities] |   |   |   |   |   |
| support for post-disaster forest recovery |   |   |   |   |   |
| promote skilled jobs and better training for local populations |   |   |   |   |   |
| enhance advisory services and support for exchanges of good practice /knowledge and for lifelong learning |   |   |   |   |   |
| reward the communities that implement sustainable forest management and publicise successful stories (e.g. through logos, prizes…) |   |   |   |   |   |
| support the local and sustainable sourcing of forest wood and non-wood raw materials (e.g. cork) |   |   |   |   |   |
| expand opportunities for income creation through non-wood forest products and services [e.g. mushrooms, berries, games, cultural services focusing on leisure, health, recreation, education, spiritual well-being] |   |   |   |   |   |
| support innovative and local forest cooperatives, SMEs and industries (fostering access to markets and value chains with wood and non-wood added-value products and services) |   |   |   |   |   |
| foster and promote cooperation and knowledge exchange among forest owners |   |   |   |   |   |
| support the digitalisation of forest management and use (including planning, implementation, monitoring and evaluation) |   |   |   |   |   |
invest in infrastructure to support sustainable forest management, disaster prevention and management, and forest protection, and exploit the economic and social opportunities of forests for rural areas

courage dialogue between different stakeholders on forest issues

other (please specify in the comments box below)

Foster the links between the new EU forest strategy and the EU bioeconomy strategy to attract investments in Europe. Cepi has just published a study on the pulp and paper industry biorefineries in Europe. The study carefully registers wood-based biorefineries in Europe, providing estimates about investments, turnover, added value and jobs which are vital in keeping rural areas vibrant. The study demonstrates the role of the bioeconomy in making the European Green Deal climate ambition happen, but also identifies the value of new bio-based products coming on the market. These insights also emphasize the opportunities to expand the valorisation of wood even further, thus contributing to the Cepi 2050 ambition of 50% more added value. For further information, please refer to: https://www.cepi.org/wp-content/uploads/2021/01/20-3362_BioRefineries_20210125_V2.pdf

In addition, possible regulatory framework for certification of carbon removals should not have unintended consequences on wood availability which is a prerequisite for the further development of the circular bioeconomy in Europe.

FORESTS FOR CLIMATE AND BIODIVERSITY

While the EU’s forests are very important for biodiversity conservation and mitigating climate change through carbon sequestration, climate change is also putting them under increasing pressure. They must be managed sustainably, improved in terms of both quality and quantity, and proactively adapted to projected climate change, in order to make an effective contribution to achieving the EU’s climate and biodiversity objectives.

Q3 What specific actions and measures should the EU forest strategy promote to enhance forest biodiversity, adapt forests to climate change, and strengthen carbon sequestration?

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<tr>
<td>increase the EU forest area through afforestation and reforestation taking into account ecological and climate change related aspects</td>
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<td>Help individual forest owners and managers to identify and manage their climate change related risks, including financial risks</td>
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<td>Restore damaged and degraded forests</td>
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<td>Increase the area of forests protected for biodiversity conservation and restoration</td>
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<td>Manage protected forests more effectively, so that they achieve their nature conservation objectives</td>
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<td>Increase the proportion of diverse, uneven-aged and mixed-species forests</td>
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<td>Enhance the genetic diversity of forests and trees</td>
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<td>Give preference to native tree species and provenances and/or species that are better suited to future climatic conditions</td>
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<td>Protect forest soils and prevent soil degradation, in particular on carbon-rich soils [e.g. limit machinery use in harvesting operations, establish different skidding tracks, maintain forest cover on erosion-prone soils and run-off pathways, leave harvesting residues on site, avoid whole-tree harvesting]</td>
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<td>Increase the use of biodiversity-friendly forestry practices [e.g. increased deadwood, habitat trees, reduce the use of pesticides and fertilisers]</td>
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<td>Promote long-term wood products and uses, replacing more carbon-intensive materials [e.g. construction, renovation, consumer products]</td>
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<td>Take measures to align wood demand and consumption with forests' sustainable production capacity</td>
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<td>Provide foresters and other stakeholders with better advice, information, tools and applications for forest protection, restoration and adaptation</td>
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improve forest monitoring at local level to improve the tracking of carbon stocks and biodiversity

boost research and innovation in best practices for enhancing carbon sequestration, adaptation and forest biodiversity

other (please specify in the comments box below)

comments

- Sustainable forest management ensures long-term stable carbon removals and enhancement of carbon storage in wood-based products;
- Possible regulatory framework for certification of carbon removals should not have unintended consequences on wood availability which is a prerequisite for the further development of the circular bioeconomy in Europe;
- When using renewable raw materials, avoided fossil-based CO2 emissions should be reported in the EU climate policy framework in order to quantify the benefits of phasing out fossil-based raw materials and energy i.e. substitution effect;
- Differences between agriculture and forestry should be carefully addressed in case carbon farming would be extended to forest land;
- Possible initiatives related to rewetting of wetlands and peatlands should be thoroughly impact assessed and overall climate benefits of forests in peatlands should be taken into account. Economic, social and environmental sustainability of these lands should be equally valued besides the climate benefits.
- Restoration of degraded ecosystems by natural disturbances is important and these areas should enhance the managed forest land cover in Europe. It is crucial to take into account the FAO note on degradation which underlines that sustainable forest management including harvesting cannot be considered as activity leading to forest degradation.
- As regards any EU actions and measures, diversity of forest resources in the EU should be taken into account. Actions and measures should be proportioned and e.g. increasement of the proportion of diverse, uneven-aged and mixed-species forests should be done where applicable.
- Protection of forest soils and prevent soil degradation, in particular on carbon-rich soils is important and it is ensured via national legislations and voluntary certification systems in place. Examples in the questionnaire on "limit machinery use" or "avoid whole tree harvesting" are unrealistic.
- The upcoming EU guidelines on closer to nature forestry should be concluded under the umbrella of EU forest strategy to bring the biodiversity and climate ambitions of the EU.
- In addition to the promotion of long-term wood products and uses, also the other wood fibre-based products and uses, replacing more carbon-intensive materials should be promoted to enhance and accelerate the transition towards circular bioeconomy.

EU/NATIONAL SUPPORT AND INSTRUMENTS

Q4 What should be done to facilitate access to, and improve the use of, EU and national funds for forest management and forest-related activities?

E.g. agriculture and rural development, research, LIFE, cohesion and regional development policy, Invest EU, Recovery and Resilience Facility, Union Civil Protection Mechanism Grants etc.
<table>
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<th>Q5</th>
<th>What are the main forest-related challenges facing the forest-based industry sector in your country and/or the EU today?</th>
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</table>

- Comment: CAP funding for forestry measures has not been used as extensively as initially foreseen. It would be beneficial to analyse the reasons behind and make corrective actions as related to e.g. criteria or description of the activity. Enabling conditions are important.

**FOREST-RELATED CHALLENGES FACING FOREST-BASED INDUSTRIES**
Despite the progress made at the pan-European level on the further development of Sustainable Forest Management, the EU policy framework remains often ignorant of the respective progress. Therefore, the forest-based industry considers challenging the lack of consistent approach to sustainability of forestry as it comes to various forest-related EU policies, especially those developed as a part of the European Green Deal. The new forest strategy should continue the halted establishment of a non-end-use sustainability approach as regards forests. It would be essential that demonstration of sustainable forest management in the EU would be the same for different outlets such as for bioenergy, financial instruments or sustainable forest fibre-based products. The approach should be developed under the umbrella of the strategy and as completed it should be embedded in the different policy frameworks to ensure consistence of these policies as it comes to forests and their management. The approach should respect the complex competence division of forest management between the member states and the EU and highlight the importance of subsidiarity.

In addition, different situations across the EU should be taken into account as regards possible competition between bioenergy and other wood uses for biomass.
PROMOTION OF WOOD PRODUCTS

Q6 What could be done to promote the wider use of sustainable wood-based products and boost their recycling rates?

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<tbody>
<tr>
<td>support consumer choices by providing better information on the environmental footprint of wood products compared to non-wood alternatives</td>
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<td>improve the exchange of best practices and promote training on sustainable uses of wood products (e.g. for architects)</td>
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<td>support research on new and innovative wood-based products</td>
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<td>improve communication methods and demonstrate sustainable forest management in the provision of raw materials for wood-based products</td>
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<td>quantify the economic value of the contribution of wood to carbon sequestration, e.g. through carbon removal certificates</td>
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<td>promote the use of local and sustainable wood products in public contracts</td>
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<td>promote investment in improved designs of wood-based products that allow easier recycling and re-use</td>
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<td>incentivise the use of recycled material in wood-based products</td>
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<td>promote sustainable wood products by changing the rules on accounting for their carbon storage capacity in national climate targets</td>
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<td>other (please specify in the comments box below)</td>
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comments

92% of our raw materials are sourced in Europe. Promotion of the use of local (EU grown raw materials) and sustainable wood products in public contracts is crucial.
As regards promotion of sustainable wood products by changing the rules on accounting for their carbon storage capacity in national climate targets, it would be important to expand the Harvested Wood Products categories in the LULUCF regulation to cover products beyond saw wood, panels and paper to e.g. textiles and packaging.

CERTIFICATION AND LABELLING

There are several certification schemes and labelling schemes in the EU for the forest-based products. We would like to gauge how well-known they are and how useful they are in supporting consumer or business decisions.

[e.g. certification schemes FSC, PEFC and labelling schemes EU ecolabels and Eco-Management and Audit Scheme]

Q7 To what extent do you know of/use tools that certify the sustainability of forest products (forest certification, product labelling)?

-at most 1 choice(s)-

☐ I don’t know of any labelling or certifying systems for forest-based products
☐ I do not trust the existing labelling and certification systems and I would like that the EU does something about it
☐ I always buy certified wood-based products with labels demonstrating they come from sustainable sources
☐ I buy labelled/certified products if there is not a significant price difference vis-à-vis non-certified products
☐ certification/labelling is sometimes an important criterion driving my decision to buy a product
☐ In my purchasing decisions, I am more likely to trust certified products from EU forests

comments

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. To prove wood is sourced from sustainably managed forests, the paper industry strongly relies on forest certification, in particular FSC and PEFC: 73% of wood and even 90% of market pulp comes from forest management certified sources.

FOREST INFORMATION AND MONITORING AT EU LEVEL

In view of the multiple services that forests provide, the numerous sectors that rely on forests and the threats to forests that are exacerbated by climate change, the 2030 biodiversity strategy refers to ‘the need for a better picture of the health of European forests’. In this regard, there are plans to develop the Forest Information System for Europe (FISE).
Q 8  What should be done to improve forest data, knowledge and monitoring of EU forests?

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<th>improvement</th>
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<tr>
<td>improve the Forest Information System for Europe (FISE) so that it becomes an EU forest monitoring system that integrates climate, biodiversity, resilience and risks, economic and social data</td>
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<td>assess forests’ climate risks and vulnerabilities</td>
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<td>improve and harmonise the monitoring of condition, pests and diseases, and other forest –related risks</td>
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<td>improve the monitoring of forest biomass</td>
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<td>improve the monitoring of forest biodiversity, including genetic diversity, and the availability of spatial analyses (e.g. maps of deadwood levels, maps of protected forest habitats)</td>
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<td>produce regular short analyses on key subjects (e.g. resilience of specific types of tree, results of key scientific articles, use of forest biomass resources)</td>
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<td>prepare more in-depth assessments of forest ecosystem services</td>
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<td>make better use of Copernicus data to monitor EU forests (e.g. by diversifying and making more regular forest products available)</td>
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<td>further work on the harmonisation of national forest inventories</td>
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<td>facilitate the integration of remote-sensing data with forest inventories and other field assessments</td>
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<td>improve the governance of FISE and involve Member State experts and other stakeholders in future developments</td>
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23
ENSURING CONSISTENCY WITH INTERNATIONAL AGREEMENTS AND SHOWING GLOBAL LEADERSHIP

The future forest strategy will help the EU to meet its international commitments and will form the basis of a clearly established, consistent and holistic approach on forests, allowing stronger EU leadership internationally (in the context of the 2030 sustainability agenda, the Paris Agreement, the Convention on Biological Diversity and the Convention to Combat Desertification). The 2019 Communication on Stepping up EU action to protect and restore the world’s forests (2019) established a framework for the EU’s global action; this must be properly and consistently reflected in the formulation of domestic policies.

Q 9 In order to ensure consistency with international commitments and to support the EU’s international leadership, the new EU forest strategy should …

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<tr>
<td>in relevant fora, set out the EU’s positions, approaches and values in favour of sustainable forest management worldwide</td>
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<td>promote experience and lessons learnt at EU level</td>
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<td>ensure consistency between the EU’s domestic policies and trade agreements</td>
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<td>ensure consistency between EU development/international cooperation and the EU’s neighbourhood policy</td>
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<td>strengthen international cooperation to implement the UN 2017-2030 strategic plan for forests</td>
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comments

The list above contains important aspects but care should be taken in which forum these should be developed.
PLANTING AT LEAST 3 BILLION ADDITIONAL TREES IN THE EU BY 2030

Trees are the source of multiple benefits – providing clean air, absorbing CO2 from the atmosphere, providing habitats and supporting our economy, livelihoods and physical and mental well-being. The new forest strategy will include a roadmap for planting at least 3 billion additional trees in the EU by 2030.

Q 10 Where should the 3 billion+ additional trees be planted?

-at most 4 choice(s)-

✓ afforestation of productive agricultural land
✓ afforestation of degraded land
  [e.g. areas subject to erosion and landslides; areas at risk of desertification; areas deforested and/or overused in the past; contaminated industrial or mining sites; other degraded land]
☐ tree planting in upper water catchments to delay and reduce downstream flooding
☐ tree planting on grasslands (except for high nature-value grasslands)
✓ tree planting in (peri-)urban areas
✓ tree planting for agroforestry, including orchards
☐ tree planting as landscape features to foster connectivity (hedges, rows of trees, copses, etc.)
☐ tree planting along infrastructure corridors (roads, waterways…)
☐ tree planting as part of forest restoration
☐ other (please specify in the comments box below)

comments

We support the objective of the EU Biodiversity Strategy to include an initiative in the upcoming Forest Strategy to plant 3 billion additional trees by 2030 and declares its active contribution to it. We are willing to go beyond the 3 billion trees objective to enhance overall health and resilience of the EU's forests and other land areas. It is essential that biodiversity would be enhanced outside forests. New areas to be afforested and tree planting outside forest land could provide high added value for Europe.

Q 11 What are the main challenges in planting additional trees in your country?

<table>
<thead>
<tr>
<th>Finding appropriate spaces in urban and peri-urban areas</th>
<th>very challenging</th>
<th>challenging</th>
<th>slightly challenging</th>
<th>not challenging</th>
<th>I don't know</th>
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very challenging | challenging | slightly challenging | not challenging | I don't know |

I don't know
Q 12 How could the EU encourage the wider use of forests for the health and well-being of all?

Common Agricultural Policy and the subsidies for farmland may cause an economic challenge for land conversion from agricultural land to afforestation/managed forest land.
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<th>Activity</th>
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<tbody>
<tr>
<td>encourage greater uptake of funds for activities promoting health and well-being (e.g. eco-tourism, improved access to urban and peri-urban forests, recreation, etc.)</td>
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<td>❏</td>
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<td>raise awareness of the health benefits of forests</td>
<td>❏</td>
<td>❏</td>
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<td>promote more research on forests and associated health benefits</td>
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<td>encourage forest-related educational opportunities</td>
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<td>promote the exchange of best practices and other communication efforts on the multiple roles of forests</td>
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<td>facilitate public access to all types of forests</td>
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<td>other (please specify in the comments box below)</td>
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**comments**

**Q13** Increasingly, consumers can compensate for the CO2 emissions associated with their purchases (e.g. flights, concerts, etc.) by paying a supplement that will be used by a private undertaking to plant trees in the EU or elsewhere. Have you ever done this?

- **only one answer allowed**
  - Yes, I have often compensated some of my greenhouse gas (GHG) impacts with tree planting schemes
  - Yes, I have occasionally compensated some of my GHG impacts with tree planting schemes
  - No, but I’m considering it
  - No, because I don’t believe that the trees will be planted
  - No, because I don’t believe that the trees will be monitored over a sufficiently long period
  - No, I haven’t
Treating forest sink as a compensation for certain “difficult-to-decarbonise” sectors be counterproductive, inefficient and far from fair. Forests are not threatened by sustainable forest-based bioeconomy but by sectors outside forests and the forest-based sector. And most of all: by climate change. The more fossil material we take from underground, the harder the adaptation will become for forests – shaking the foundations of the policy.

ADDITIONAL FEEDBACK

Should you wish to provide additional information (e.g. a position paper) or raise specific points not covered by the questionnaire, you can upload additional documents here.

Please note that any uploaded documents will be published alongside your response to the questionnaire, which is the main input to this consultation. The document is optional and serves as additional background to help us understand your position.

additional information and comments

Cepi position paper on the new EU Forest Strategy can be found enclosed. Moreover we would like to express our support to the European Parliament resolution entitled the European Forest Strategy - the Way Forward https://www.europarl.europa.eu/doceo/document/TA-9-2020-0257_EN.html

please upload your additional documents

Only files of the type pdf, txt, doc, docx, odt, rtf are allowed