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Cepi position paper on carbon removals certification and sustainable forest management

Cepi considers it essential that carbon farming certification methodologies support the European bioeconomy and strengthen the EU's strategic autonomy by promoting forest growth, thereby enhancing carbon sinks while increasing the availability of wood for processing. The forest-based sector contributes to climate change mitigation in three ways: through carbon sequestration in forests, carbon storage in forests and harvested wood products, and the substitution of fossil-based materials and energy. Carbon removal certification should aim to optimise this combined mitigation potential, by enabling the value-chain contribution of the forest sector.

This can be achieved by ensuring that forest management practices contributing to carbon storage do not reduce the long-term growth potential of forests. On the contrary, certification systems should recognise and encourage management strategies that simultaneously enhance forest carbon stocks and sustain or increase biomass production over time. This is essential to ensure that carbon removal certifications contribute not only to climate mitigation but also to the long-term development of the European bioeconomy and the continued supply of renewable raw materials.

Cepi also stresses that the success of carbon farming certification depends on its feasibility and uptake by forest owners and managers. Any EU-level certification methodology should avoid creating additional regulatory burdens that could discourage active forest management, as this would undermine both climate objectives and forest resilience in the long term.

Great caution is needed when regulating forestry via secondary legislation, to avoid undermining the Member States' competence and imposing a top-down approach that fails to reflect Europe's forestry diversity. To enhance forest's resiliency and carbon uptake, practices must be carefully tailored to local conditions and should balance the carbon benefits with the risks of reversals due to natural disturbances.

Finally, the use of the term "improved forest management" to describe eligible activities under the certification scheme is not appropriate. While this term is common in voluntary carbon markets, there are reasons to object to its use in EU legislation. The wording implies that there is one universally "better" way of managing forests, whereas in practice this fully depends on the management objective. In this context, the objective is carbon sequestration and storage, and that should be explicitly stated.

1) Scale of the certified forest management activities

The methodology should allow maximum flexibility on the choice of the area to be certified, from parcel to landscape level. At the landscape level, active forest management — which includes thinning strategies, fertilisation, site adaptation, choice of species, improved planting material, prevention of damage, including from game — can increase forest growth (and thus carbon sequestration) while still providing raw materials for the bioeconomy. At the same time, certification should be also available to forest owners with smaller holdings, considering that in many EU countries the forest ownership is highly fragmented.

2) Additionality

The Carbon Removals Framework Regulation stipulates that eligible activities should go beyond Union and national statutory requirements at the level of an individual operator. There is generally no direct obligation in EU-27 national forest codes requiring private forest owners to increase carbon sinks or carbon stocks nor to

proactively adapt their forests to climate change, while carbon-sink targets are imposed on Member States under the LULUCF Regulation. Any measure going beyond the general obligation to regenerate the forest after harvesting should therefore be considered additional. Examples of additional actions are selecting thinning regimes designed to optimise carbon uptake, water balance, stand quality and fire resilience; interventions aimed at creating structurally resilient stands; climate-adapted, productivity-oriented regeneration.

3) Eligible activities

As a general approach, the methodology should avoid detailed prescriptions and instead emphasise that a wide variety of activities should be allowed and tested within the methodology, to underline that different practices are relevant for different forests. The methodology should also not limit forest management methods or growth enhancing measures.

Forest governance and management need to respond to increasing uncertainty, largely driven by the growing frequency and intensity of natural disturbances linked to climate change. In this context, policy approaches should aim to simultaneously strengthen forest resilience and enhance the forest carbon sink. Enabling this will require sustained investments across the forestry sector, and carbon removals certification should be a tool to support such transition.

Evidence indicates that the probability and severity of disturbances tend to increase with higher levels of above-ground biomass. For this reason, the certification should incentivise the adoption of risk-reduction measures that enhance the stability of forest ecosystems. Key measures include regulating stand density through appropriate thinning practices[1], reinforcing wildfire prevention[2] and preparedness strategies.

At the same time, active management to optimize tree growth should also be incentivised: thinning operations, rejuvenation of over-aged forest stands, as well as choosing the most appropriate rotation period to reduce risk for disturbances and optimize growth rates. Fertilisation to enhance forest growth should not be prohibited under the scheme, as it is a good tool under certain conditions[3].

Over the longer term, significant opportunities exist to further strengthen forests' adaptive capacity through genetic improvement and the selection of more resilient tree species and provenances, as well as diversification of tree species composition[4].

To ensure that forest ecosystems remain resilient under changing climatic conditions, the methodology should not limit species that are well adapted to local conditions and already extended in specific countries/areas. It should be possible to use well adapted non-native species after demonstration of bioclimatic compatibility with projected future climate scenarios, as well as suitability for local soil and ecological conditions and wood

[1] Giuggiola et al. (2013), Reduction of stand density increases drought resistance in xeric Scots pine forests. Forest Ecology and Management; Schmitt et al. (2020), Decreasing stand density favors resistance, resilience, and recovery of Quercus petraea trees to a severe drought. Annals of Forest Science; Tonelli et al. (2023), Thinning improves growth and resilience after severe droughts in Quercus subpyrenaica coppice forests in the Spanish Pre-Pyrenees, Dendrochronologia.

[2] In Mediterranean regions, fuel management that combines targeted thinnings with understorey/shrub reduction is one of the clearest, evidence-based ways to disrupt vertical and horizontal fuel continuity, thereby lowering flame length, rate of spread, and crown-fire potential. Lasanta-Martínez, T. et al. (2022), An environmental management experience to control wildfires in the mid-mountain Mediterranean area: Shrub clearing to generate mosaic landscapes. Land Use Policy; Vilà-Vilardell et al. (2023), Prescribed fire after thinning increased resistance of sub-Mediterranean pine forests to drought events and wildfires. Forest Ecology and Management, 527.

[3] Richy et al. (2024), Phosphorus limitation promotes soil carbon storage in a boreal forest exposed to long-term nitrogen fertilization. Global Change Biology; Tupek et al. (2025), Long-term nitrogen fertilization alters microbial respiration sensitivity to temperature and moisture, potentially enhancing soil carbon retention in a boreal Scots pine forest. Biogeosciences.

[4] Lindner et al. (2025), Managing Forest Disturbances in a Changing Climate. European Forest Institute.

processing to maximise the substitution effect. This is especially relevant in regions such as the Mediterranean where significant climatic shifts are anticipated.

4) Sustainability criteria

The carbon removals framework regulation adopts a “do not harm approach” regarding six environmental objectives. With regard the circular economy, a criterion addressing carbon leakage as a result of decreased harvesting should be included. In fact, forest management strategies based on longer rotation periods may increase both potential disturbance risks and systemic effects on the forest-based sector, as extending the rotation period will reduce the timber harvest and, consequently, lead to displacement of harvest and wood processing outside Europe.

Biodiversity do-not-harm criteria should require that in areas designated by the national competent authority for conservation or in habitats that are protected, the activity shall be carried out in accordance with the conservation objectives for those areas, and that the activity shall not result in the conversion of habitats specifically sensitive to biodiversity loss or with high conservation value, or of areas set aside for the restoration of such habitats in accordance with national law.

5) Biodiversity co-benefits

Biodiversity is protected and enhanced due to sustainable forest management in EU Member States. Activities such as dead wood retention, conservation of micro-habitats, tree species diversity, set-asides, creation of species habitats, are often carried out in addition to legal requirements. A non-binding and non-exhaustive range of biodiversity enhancing actions could be included in the methodology but needs to be recognised for their contribution.

At the same time, it is important to avoid a mandatory checklist of activities to perform as a top-down approach. The general requirement should be to demonstrate that the practice carried out has beneficial impacts for biodiversity protection or restoration; this can be done via reference to peer-reviewed scientific literature or cooperation with scientific and academic research bodies. Moreover, there approach should be flexible on what and where biodiversity enhancing actions happen, as they may not necessarily be performed the same stand as the CRCF activity itself.

Finally, Sustainable Forest Management (SFM) certification systems, namely FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification), are formalised safeguards to ensure that forest management provides measurable biodiversity benefits. These certification systems go significantly beyond the requirements of national legislation and therefore constitute credible, verifiable evidence of biodiversity co-benefits for carbon farming activities.