

Brussels, 6 December 2018

**Feedback on the European Commission Roadmap:  
evaluation of the impacts of the CAP on habitats, landscape and biodiversity**

The Confederation of European Forest Owners (CEPF) welcomes the European Commission initiative to evaluate the impacts of the Common Agricultural Policy (CAP) on habitats, landscape and biodiversity. CEPF considers the five evaluation criteria (effectiveness, efficiency, relevance, coherence and EU added value) as highly relevant and suggests cost-effectiveness as a sixth criteria to highlight the link between the CAP funding instruments and their impacts.

More than 40% of EU's land area is covered with forests of which approximately 60% are privately owned. European forests represent more than half of the designated Natura 2000 areas. Forests sequester CO<sub>2</sub> from the atmosphere as they grow and deliver multiple goods and ecosystem services such as biodiversity, soil protection, drinking water, non-wood forest products and recreational spaces. At the same time, forests are a sustainable source of timber, pulp, paper and energy, providing the largest non-food renewable resource for a sustainable bioeconomy, growth in rural areas and around 4 million jobs in forestry and related industries. Forest resources, including growing stock and the size of forests, have been significantly increasing during last decades in Europe. Investments in active and sustainable forest management are one of the prerequisites for the development of healthy and viable forest resources.

The implementation and further development of sustainable forest management, integrating biodiversity, is at the core of forest owners' activities in Europe. When assessing the impacts of the CAP on habitats, landscape and biodiversity, CEPF highlights the need to acknowledge time scale of changes in trends, as they are bound to the dynamic and long-term processes of forest ecosystems. Moreover, external factors such as climate change can have significant negative impacts on positive actions taken by forest owners and thus negatively impact positive trends. CEPF considers that relevant time-scale and external factors have to be explicitly acknowledged and taken into account in the evaluation of the impacts of the CAP.

European forest owners have a crucial role as managers of forest resource, not only on tackling challenges related to environmental, social and economic sustainability but also on challenges related to the impact of climate change on the resilience and vitality of forest ecosystems.

CEPF considers that when evaluating the impacts of the CAP on habitats, landscape and biodiversity, the link between sustainable management and long-term climate goals to be achieved via increased CO<sub>2</sub> sequestration, carbon storage and substitution of fossil-based materials should be taken into account.

Overall, CEPF considers that it is of the utmost importance to ensure coherence between the current initiative and EU political priorities (including UN SDGs and the Paris agreement) and EU policies. Promoting and supporting the implementation of sustainable forest management in the EU is key to further enhance biodiversity and habitats, and is consistent with worldwide SDGs.

CEPF welcomes the opportunity to contribute to further steps of the evaluation and reminds that it is of utmost importance that European forest owners are considered as main partners, and not only as stakeholders, when it comes to assessing impacts of the CAP on forest biodiversity and habitats.

