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Confederation of European Forest Owners  
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## CEPF contribution to a Public Consultation on the Green Paper on Forest Protection and Information

**The Confederation of European Forest Owners (CEPF)**, serving the interests of approximately 16 million forest owners, welcomes the Commission's initiative for a debate on how the EU policy should evolve to prepare forests for climate change. We also welcome the fact that the Green Paper stresses **the environmental functions and ecosystem services** benefiting society as a whole. Given that providing all of this requires sharing responsibility, **a need for increased cooperation and strengthened institutional capacity** of the forestry sector at both EU and national levels has become more apparent. A holistic, long-term approach towards the merits of forestry, as well as an appropriate framework, are prerequisites to enable the sector to cope with new challenges.

CEPF stands on the position that the discussion on EU policy options should inherently encompass the EU Forest Strategy and EU Forest Action Plan. Furthermore, the long history of responsible investment in **sustainable forest management (SFM) by the Member States as well as by Family Forest Owners** must be at the core of this debate. Recognizing and promoting SFM also ensures the continuation of the multiple and important forest functions, including valuable results rendered to the environment.

### Question 1:

- **Do you think maintaining, balancing and enhancing forest functions should be given more attention?**

CEPF takes the view that maintaining, balancing and enhancing forest functions are an integral part of sustainable forest management. Its principles address the multifunctional role of forests and their readiness to meet the economic, environmental and social needs of both present and future generations. These principles have been defined and mutually agreed upon by the EU and its Member States within the framework of the intergovernmental process "Forest Europe." Furthermore, they are transformed into national policies, including national forest programs, as well as into practical guidelines effecting the operational level of forest management. European forest owners are deeply committed to these principles and have significantly contributed to prudent use of forest resources, which provide immeasurable socio-economic values.

However, the recent environmental changes, as well as political developments, place significant challenges on forestry, including climate change as the most important issue for the years to come. Multiple sectoral policies and shifting societal demands sometimes result in contradictory interests with regards to forest functions. Hence, the need for a holistic approach in safeguarding the multi-functionality of forests, in order to ensure the continuation of their multiple and important functions.

The importance of the sector must be appreciated – not only for its intrinsic value for biodiversity or landscape, but also as a key sector in the new green economy.

- **If so, on what level should action be taken, EU, national and/or other?**

As the main responsibility for forestry policy within the EU rests with Member States, any actions to be taken should fully comply with the principle of subsidiarity. Different needs and priorities become apparent according to the different levels, although enhanced coordination of work at all possible levels, i.e. national, EU, pan-European and global, is necessary.



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As a paradigm the EU should focus on adding value to national forest policies, specifically through supporting the major contribution of forests to combating climate change. This could be done through **political recognition of sustainable forest management as a viable and commonly acceptable concept** and guidance to other forest-related policies and processes within, as well as outside, the EU.

The EU should **support the implementation of SFM and the multiple functions fulfilled by forests** in the Member States through **strengthened cooperation and financial incentives**. The EU can also play an important role in steering and **coordinating EU development in other sectoral policies** such as rural development, energy and so forth. Furthermore, it is important that all EU regulations provide for equal recognition of all forest functions. Balancing of functions should be tackled at a national level and supported by adequate national legislation. The EU policy framework should allow for implementation in a decentralized manner. National strategies should focus on recognizing the needs of forest owners and providing adequate measures allowing the balancing all functions, including production.

- **How should it be done?**

Any further development at the EU level should happen within the framework of the EU Forest Action Plan and in line with the competencies of the Member States. Policy dimensions of multifunctional forest management should be carefully looked at in order to develop an approach **for cooperative planning and improved institutional design at the EU level**. The EU Forestry Strategy and EU Forest Action Plan, as well as the achievements of the Forest Europe policy, should be inherently encompassed in these. For CEPF it is imperative that these efforts are not exclusively focused on adapting to climate change. All other challenges, but also opportunities, currently faced by Europe's forests should also be taken into consideration.

CEPF sees an urgent need to better **coordinate existing forest-related EU regulations**. The consolidation of conflicting interests in forest policy is needed more than ever on an EU level. An increased push for holistic integration of various forest values has to be followed with **an adequate policy framework**. The development of **EU economic instruments to promote and compensate the provision of ecosystem services**, including the conservation of biodiversity and voluntary steps to address challenges of climate change, should be at the core of such actions. The value of these eco-system services should be acknowledged in a way to enable to **secure solid public funding through a change in the EU Common Agriculture Policy and Rural Development measures**. It is the economic sustainability of forest owners that can enable taking all other aspects of forest multi-functionality into consideration. The production of a variety of services from forests, in particular wood itself - the most promising and multifunctional natural resource, has never been more crucial.

The forest sector undoubtedly needs stronger political recognition and must be integrated within the EU **to become a core of the EU2020 strategy** and its key element, green growth. **Enhanced competitiveness of the sector**, and promoting the yet unrevealed potential of wood products, could be a way forward.

Existing policy tools, such as national forest programs, are vital to the process of shaping national strategies and, particularly, in safeguarding and adapting multi-functionality to local conditions. They form a basis for the Member States to encompass a comprehensive and harmonized approach to their operational activities.

Participation of stakeholders is crucial. Without dialogue, full cooperation and, in the end, a strong alliance between politics, administration, nature conservation and forestry, all efforts are condemned to failure.



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**The role of the forest owners in putting sustainable management into practice has to be acknowledged at all levels and all stages of a possible development** of further political work. This cannot happen without consulting the people who have a direct connection to forests.

**Forest monitoring and inventorying** could be also a possible EU-level action to follow the evolution of the status of forest functions and to provide data and prognoses on changes in factors important for growth, health and ecosystem stability.

#### Question 2:

- **To what extent are EU forests and the forest sector ready to address the nature and magnitude of the challenges posed by climate change?**

Although the magnitude of the challenges posed by climate change are difficult to understand and remain to be revealed, there is no doubt about the full engagement of the forest sector in confronting these.

A long-term commitment to sustainable forest management in Europe has resulted in healthy and productive forests that offer an economically, environmentally and socially effective means for addressing climate change, including on a global level. As acknowledged by the Green Paper, more forest grows in Europe than is harvested, and a wide range of products and ecosystem services enrich our lives and environment. At the same time, Europe's forests are producing an increasing amount of renewable, reliable raw material and they absorb an equivalent amount of carbon dioxide. Sustainable forest management guarantees all these, proving that it can and must make an important contribution to climate protection.

CEPF calls on European policy makers to recognize the fact that forest resources, and **sustainable forest management in particular, can be a vital part of the solution. The forest's contribution in meeting climate challenges should be promoted by an appropriate framework.** This is especially important to ensure that the sustainable development of Europe may be the most important task in the years to come, and perhaps one of the most viable strategies for a sustainable future.

As the custodians of more than half of the forest area of the EU, family forest owners insist on **action to unlock the full potential of forests in order to limit global climate change and allow the European Union to achieve its commitments.** The European forestry and forest-based sector are in a position to effectively contribute to finding better solutions for the present environmental challenges. This cannot happen without a process of prioritizing and **setting a comprehensive, integrative and coherent European strategy** for the use of our forest resources.

- **Do you consider particular regions, certain countries more exposed/vulnerable to the effects of climate change? What sources of information would you base your answer on?**

Measuring vulnerability effects from climate change on forests can only be very approximate. Climatic conditions strongly affect the fundamental growth requirements of forests, such as temperature, air, water and length of vegetation growth period. Increasingly variable rainfall patterns, severe storms, droughts in one region and floods in another part of Europe do not create an equal-opportunity threat. However, it is already well known that the increasing frequency and intensity of some natural disasters varies according to region and different climate change scenarios.



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Several trends can be observed across the EU. Forests in the Mediterranean region, impacted by greatly rising temperatures and droughts are exposed to increased fire risk. The range or distributions of certain species are also likely to shift. Many other factors that influence the actual vulnerability rates, including the natural, ecological characteristics as well as human-induced adaptive capacity of forests, have a role to play. The complexity of the problem requires regional, national as well as international research and observation.

**The EU should certainly take a leading role in developing research program that help to understand and assess vulnerability of forests in particular regions.** Increased collaboration between Member States can also facilitate the exchange of experiences and better adaptation for cross-border disturbances. For this, credible information and monitoring are needed.

Family forest owners attach special importance to this issue as they bear responsibility and financial risk with regards to management decisions that shape the forest and economic environment for hundreds of years to come.

- **Would you see a need for EU-level early action to ensure all forest functions are maintained?**

CEPF takes the view that **action is necessary to allow balancing all aspects of sustainable forest management in terms of productive, environmental and social values.** This should be done despite ongoing changes, on the political scene and in nature. Forestry is lagging behind when it comes to integration into other EU policies as well as when financial support from European funds is considered. Funds available with an environmental profile, such as the Natura 2000 network, only partly secure protective functions of forests. EU measures that enhance the socio-economic functions of forests and their contribution to mitigating climate change are even more limited.

Currently there are many conflicting policies, creating a situation which hampers the progress of meeting future goals and challenges. The Green Paper on Forest Protection and Information cannot, as such, be the only answer to this clear lack of a coherent policy instrument. On the EU-level, the consolidation of conflicting interests in forest policy is needed more than ever.

Examples of early actions could focus on increased adaptation measures and risk management, research programs, as well as the development of other frameworks that enable stakeholders, including forest owners, to be better prepared for the effects of climate change. Considerable effort is needed in support of capacity building to bring help down to the “man on the ground”. The millions of European private forest owners, of which the majority possess only a few hectares, need assistance in understanding the numerous forest policies and strategies in order to apply them on the ground. They also require technical support in selecting the right adaptation measures and launching the process of adapting the composition of species. Prevention of a large scale disaster such as storm, fire, drought, and insect damage push for coordinated responses, also in terms of rapid measures against large-scale market distortion.

Fragmentation of forest ownership could be also looked upon as an asset in maintaining forest biodiversity and achieving active, manifold, public participation. Advertising the request for “legal provisions and incentives to reduce ownership fragmentation” is blocking any attempt for innovative thinking in the direction of co-operation between forest owners. The more intensive the co-operation, the more easily the fragmentation will find its natural solution.

- **How could the EU contribute to add value to the respective efforts of Member States?**



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The EU should play an important role not only in proposing options for early action at the EU level but also in developing framework and providing funds that support the implementation of these measures by the Member States. In this regard the EU can stimulate cross-border collaboration, development of research programs, especially for regional vulnerability assessment and genetic resources. Monitoring of the state of Europe's forest should be included in EU activities.

Coordinated exchange of experience among countries can help in development of response strategies. Management of large scale market distortions must also be assessed and addressed at the EU level.

Besides what we have just mentioned above, CEPF calls on the EU to take a more proactive role in promoting the value of public services provided by forests. The development of EU financial instruments to promote and compensate for the provision of ecosystem services cannot remain in the sphere of political rhetoric.

The role of forests in the EU climate change adaptation agenda can also be addressed through recognition of forestry measures and the inclusion of harvested wood products (HWP) in European or global emission trading systems. The EU should take a role in anticipating, and drawing the attention of Members States to global trends as well as facilitating actions on a national level. This can be done through the promotion of wood products as the most promising and multifunctional natural resource, contributing to a sustainable and prosperous society based on a carbon neutral economy.

Another sort of action could be to evaluate and update all EU forest related policies in terms of their support to the mitigation and adaptation to climate change. Especially, policies that blank out the economic and social needs of society and promote the static protection or setting aside of forests, should be reviewed. The EU should secure a balanced approach between protection and increased use of forest resources and promote this natural asset in all other strategies towards the European Union carbon neutral and sustainable society.

### Question 3:

- **Do you consider that EU and Member States policies are sufficient to ensure that the EU contributes to forest protection, including preparing forests for climate change and conserving biodiversity in forests?**

CEPF sees that there is a variety of existing instruments within the EU as well as the Member States. These should be evaluated and better coordinated for serving the new challenges, including climate change and possible loss of biodiversity. The fact that forest policy has a cross-sectoral structure adds to the difficulty in the sense that conflicting and contradictory goals are often being set.

Furthermore, the process of making policy operational on the ground requires more effort. **Better communication** of objectives, simplification of procedures and greater **involvement of key stakeholders**, from the early stages of the process onward, are the main areas for improvement. The complexity and variety of the existing tools is enormous. In addition, this has not always been efficiently communicated downstream to the sector, ignoring the importance of key actors who are required to take action.

There is **a clear need for increased funding** as often the existing strategies have been lacking sufficient financial measures. Availability and accessibility of forestry measures should be the focus of possible improvement.



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Hence, before launching new strategies, CEPF strongly recommends **improving the efficiency of current policy**. Increasing the coherence of existing legislation and, if necessary, closing gaps would be an appropriate way forward. Current coordination of forest policies linked to the EU Forest Action Plan has not been sufficient. Instead, CEPF advocates strengthened institutional capacity in the forestry sector at the EU level and harmonized policy formulation and implementation.

- **In what areas, if any, do you think further action may be necessary? How might this be organized, under the given policy framework or beyond?**

Based on the above comments CEPF recommends further action **to enhance policy coordination within the EU and between the EU and Member States**. This could be achieved with the existing policy framework, but would require **instituting an independent forestry coordination and administration entity in the EC**. The entity would help to address key forest-related issues across the EU policy fields, including environment, agriculture and rural development, energy, industry, and regional development. This could also strengthen cooperation and define competencies in the field of forestry within the EU, the Member States and internationally. The Member States often take advantage of the current situation when forestry has been dealt with by so many directorates general. This is especially true when it comes to setting national priorities and allocating funds; forestry often loses out against agriculture, as both are an integral part of rural development. Moreover, forestry has been subjected to the strong influence of environmental policy, which very seldom has clear and direct links to financial measures.

The EU should take further steps **to support the pan-European policy development carried out by Forest Europe**. One such action could be to promote development of a legally binding instrument for forests. Capacity building and development of financial mechanisms for reinforcing implementation of pan-European principles and guidelines in the Member States should also be further explored.

Another area where the EU needs **to improve its action is communication and information sharing**. A changing climate poses fundamental challenges to maintaining all forest functions, adding to the role of forests in capturing and storing carbon. Smarter communication with the public is needed in order to bring about **social change and to put a proper value on those services**. As shown by a report by DG Agriculture in 2009, there is a clear gap between public perception and actual facts about forests. The European public is worried about the condition of forests. Moreover, a significant majority of citizens believes the forested area to be decreasing in their respective countries. Global debate on climate change, which focuses mainly on deforestation, has an indirect impact on public opinions about forest resources in Europe. This in turn can lead to a negative attitude and consumer confusion about the role of forests in mitigating climate change. The EU initiative on the development of a communication strategy on forests has been the first step taken to improve people's understanding of sustainable forest management as a source of multiple benefits. Implementation of this strategy, however, would require additional action and resources.

Additionally, it would be necessary to consider regional differences that, to a great extent, have an influence on the individual situations of Member States and the need for further action while considering climate change. For some regions it has already become evident that more frequent and severe natural and man-made hazards, including forest fires, floods and insect outbreaks, would require coordinated action and assistance from the EU. A long term perspective should consider establishing a European risk management strategy for forests.

As mentioned before, the research agenda should therefore be prioritized accordingly.



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**The contribution of forests and forestry to rural development** should be also encouraged. Sustainable forest management includes a versatility of traditions, which connect people to their country and roots. With effective conservation and sound management, the forest resource offers multidimensional opportunities for socio-economic development, keeping rural areas alive. **Financial and legal instruments that motivate forest owners to take necessary actions** should be strengthened through the rural development programs. Also, **measures to facilitate cooperation and advisory services** at a local level should be introduced in order to raise awareness on aspects of climate change and biodiversity protection. Operational support is necessary to encourage mitigation actions and assist forest holders in adaptive measures.

#### Question 4:

- **How could the practical implementation of Sustainable Forest Management be updated in order to upkeep the productive and protective functions of forests and overall viability of forestry, as well as enhance the resilience of EU forests in view of climate change and biodiversity loss?**

The concept of sustainable forest management has a long and continually evolving history. It embraces both dimensions: the process of defining policy principles and the development of the best operational practices. Overall, it entails the management of forests to maintain their full range of environmental, social and economic values, ensuring forest health and the ecological sustainability of practices. Although the objectives remain valid, **CEPF calls for their social and political reinforcement.**

Accommodating sufficient conservation measures and sustaining the economic use of forests should be the way forward. Human activities continue to influence most ecosystems in Europe. Abandonment of land with no intervention is not the better way of protecting forests and biodiversity.

On a practical level, CEPF would like to see **adaptive forest management strategies evolve** in relation to the geographical scale of climate change impacts in the regional, national and local context. These could provide guidelines for the selection of genetic material for regeneration, including the option of species, and recommendations for their structural diversity. Also, measurements to promote a more efficient use of close-to-nature forestry management methods could be introduced.

**The role of monitoring will also increase** due to the necessity for a rapid response in case of forest disturbances as well as for measuring the state and trends of biodiversity in forests. Hence, the need for development of a harmonized monitoring system.

**The update of practical implementation of SFM should be based on the existing tools developed by Forest Europe.** Criteria and indicators (C&I) have emerged as a powerful tool in implementing and monitoring progress in SFM. These should be looked at primarily in order to identify areas that need improvement so as to promote the best ways to address current challenges. CEPF emphasizes, however, that in this process focus on the operational needs and adoption of innovative approaches to optimize the use of resources would be essential.

Furthermore, the review of National Forest Plans (NFPs) can provide further indications for an update of operational methods. Experience with NFPs can be utilized to introduce mechanisms to address cross-sectoral impacts related to climate change and biodiversity protection at both a national and regional level.



As implementation relies on people, simplification is required to help them understand and accept the regulations. Introduction of restrictions and additional bureaucratic burdens can discourage forest owners from active management.

- **What steps are required to ensure that the gene pool in forest reproductive material can be successfully conserved in its diversity and adapted to climate change?**

The issue of conservation of the gene pool is very difficult to assess from the perspective of forest owners. We feel that this area should be left to research and be based on evidence from long term observation. However, **action in support of the conservation of a broad range of genotypes should be put in place without delay.**

In general, **forest owners look forward to reliable advice on how to secure the existing gene pool and how to enable this pool of genes to adapt to swift changes in climate.** The EU should support the development of breeding programs and the establishment of national gene banks. These initiatives could also take care of the improvement of resistance and selection of reproductive material.

#### Question 5:

**Taking into account the various policy levels, is available forest information today sufficient to assess with sufficient accuracy and consistency:**

- The health and condition of EU forests?
- Their productive potential?
- Their carbon balance?
- Their protective functions (soils, water, weather regulation, biodiversity)?
- The provision of services to society and their social function?
- Overall viability of forestry?
- If it is insufficient, how should information on forests be improved?
- Are efforts towards harmonized data collection on forests sufficient?
- What can the EU do to further develop and / or enhance forest information systems?

There are various sources of information about forests across Europe and many initiatives that can contribute to forest monitoring and reporting with data relevant to topics raised in subdivided questions. At this time, CEPF would find it difficult to assess whether the available information is adequate and sufficient. What we would like to underscore is the **necessity to base all forest-related policy decisions on credible, comprehensive and reliable information.** This requirement should apply to all EU legislative initiatives, not only to those regarding climate change. CEPF suggests action targeting the following areas:

- **strengthening national efforts and capacity for conducting National Forest Inventory systems** in the way that allow reporting needs to be fulfilled concerning all aspects of forest ecosystems and the production of services from forests at both national and European levels;
- **streamlining the collection and compilation of forestry data at the European level** to secure credible and reliable data and information needed for decision-making related to policy processes.

A number of issues should be considered within these two areas, such as the frequency and continuity of reporting, harmonization and comparability of data, just to name a few. The effects of climate change increase the need for more frequent monitoring of damage from natural disasters. Also, early warning systems and increased risk of damage could be part of the EU development on forest monitoring and



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reporting. Information gaps related to the provision of non-wood products and services, including carbon balance, biodiversity and biomass should consequently be eliminated.

#### Question 6:

- **Would you like to make further comments on the questions set out in the Green Paper or raise any other issues concerning forest protection and information in EU?**

CEPF welcomes the Green Paper as a step forward in the right direction to integrate sustainable forest management into other EU legislation and processes. Although the competence for forest policy lies with the Member States a number of substantial EU developments influence forestry significantly. Increasing demand for the environmental functions and ecosystem services that benefit society as a whole **requires shared responsibility and an appropriate framework to guarantee fair and consistent conditions for forest owners.**

However, the EU should **secure consistency and continuity in sectoral and cross-sectoral policies and legislation.** Therefore, the debate on the future of Europe's forests should be undertaken under the auspices of existing EU forestry instruments such as the EU Forest Strategy and EU Forest Action Plan. The Green Paper reflects on the possible future measures to protect EU forests but undoubtedly it opens a new political pathway in the EU forest policy. Shifting the debate in this direction can lead to changing the focus of the EU's forest-related principles and narrowing the scope towards protection rather than the promotion of sustainable use and multi-functionality of forests. Such a shift would be against the commonly agreed target set out by the EU 2020 strategy. Neither would it support the EU's previous achievements or the Member States approach in the field of forestry.

CEPF would therefore like to repeat the **necessity for a comprehensive approach addressing, in a balanced way, the multiple and interrelated social, economic and environmental functions.** Protection has been and remains a fundamental part of sustainable forest management. And none of above functions should be considered separately in the context of forest policy.