

## **STATEMENT**

## European Parliament's position on Deforestation and Forest Degradation - Improvements made but some concerns remain

Brussels, 13 September 2022 – European forest owners fully support the EU's ambition and efforts in halting the global deforestation and forest degradation. The today adopted European Parliament position could improve certain measures and definitions to achieve successful implementation of the regulation compared to the Commission's proposal. However, from European forest owners' perspective, some concerns still remain regarding the implementability.

On a positive side, the Parliament's proposal to remove the definition for "sustainable harvesting operations" is a crucial improvement, and in line with the Member States' position. The Parliament position also introduces a deadline of six months for the Country Benchmarking which would help to avoid potential bottlenecks in the Commission's assessment procedure.

Unfortunately, the position also introduces a number of inadequate definitions and provisions that risk losing the balance between high ambition and implementability. In this context, European forest owners and managers have already raised their concerns<sup>1</sup> regarding the definition of the term "forest degradation" and on the measures on substantiated concern and access to justice. Next to these issues, the Parliament's position adds further points that are concerning to European forest owners.

- The Introduction of the term "forest conversion" could hinder managing options to adapt forests to the changing climate, as it prevents changes in the composition, structure and function of forest ecosystems.
- New geolocation requirements are hardly (if at all) implementable and based on uncommon parameters. Especially the requirements to provide geolocation coordinates presents a challenge for forest owners for technical reasons.
- Narrowed down simplification of due diligence puts unjustified burden on operators which
  only produce in low risk countries. Furthermore, broader simplifications would increase the
  incentive for countries to reduce their risk category.

In the upcoming Trilogue negotiations, the above-mentioned measures and definitions from the Parliament's report would need to be improved in order to strike the right balance between ambition and feasibility. Only then, forest owners and other actors will be able to practically implement the regulation and effectively prevent deforestation.

<sup>&</sup>lt;sup>11</sup>https://www.cepf-eu.org/news/position-forest-owners-managers-considerations-ec-proposal-deforestation-and-forest-degradation

