Confederation of European Forest Owners

15 September 2025

CEPF Feedback on the Commission's Proposal for the EU 2040 Climate Target

CEPF takes note of the Commission's proposal to reduce the Union's net greenhouse gas emissions by 90 % compared to 1990 levels by 2040. European forest owners support the decarbonisation of the European economy, aligning two major ambitions: the urgent reduction of our Union's dependency on fossil fuels and fossil-based materials, as well as the creation of an enabling EU policy framework to support the European bioeconomy for a sustainable economic transition and enhancing the EU's strategic autonomy.

In the EU climate policy architecture, the LULUCF Regulation (Land Use, Land Use Change and Forestry) plays the central role with direct implication for forestry and forest owners, who manage the sector of the highest climate change mitigation potential among the LULUCF sectors. 'Forest land' under the LULUCF Regulation has been and is still regarded as the main pillar of the land-based carbon sink in Europe, which is expected to deliver on the Union-wide net climate target.

The active and sustainable management of European forests is a key component of meaningful action for climate change mitigation and instead of a continuous emphasis on static sink increasement, efforts should be put on long-term management of forests that is key in keeping forests well-growing and resilient also in the changing climate. Relevant climate performance indicators from national forest inventories should be carefully taken into consideration.

Forest resources in Europe have expanded in terms of total area and growing stock volume but also in average stand age. Furthermore, the European forest carbon sink is estimated to have increased by almost five-fold from 1950 to 1999 and was rather stable until 2013[1]. Thanks to long-term sustainable forest management, European forests had been indeed acting as potent carbon sink over the past decades, and a robust carbon stock has been built up, however the carbon sink function changed course in several member states in recent years[2]. CEPF highlights that the European forest carbon sink is not a static and permanent phenomenon, which ought to enable long-term and predictable policy planning.

[1] https://efi.int/forestquestions/q16
[2] https://foresteurope.org/publications_type/state-of-europes-forests-2020/

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Climate change-induced tree mortality and reduced forest growth combined with increased salvage harvesting following natural disturbances are among the key reasons of the decreasing sink capacity in Europe. Rising temperatures, prolonged droughts, and increased frequency and intensity of natural disturbances (e.g., pests, fires, storms) reduce forest growth and carbon sequestration rates. At the same time, aging forests reach a physiological saturation point, where net carbon uptake slows as growth declines and mortality increases. The adaption of European forests to climate change is an on-going, yet decades-long process, whose effects in the carbon sink function will only be accountable in a matter of decades.

Policies that incentivize reduced harvesting risk leading to unintended negative consequences for long-term carbon sequestration, forest resilience, and the supply of European sourced timber for material substitution - one of the most effective climate change mitigation strategies. Any future policy instrument dedicated to delivering on the EU 2040 Climate Target should avoid such approach, with special regard to the future LULUCF Regulation. Instead of legally binding climate targets with potential derived penalty regimes, the trajectory of future climate change mitigation policy instruments should be marked by indicative targets.

European forest owners underline that biodiversity and healthy forest ecosystems are prerequisite for a renewable and circular forest-based bioeconomy. A sustainable and circular EU bioeconomy can responsibly source the existing carbon stock, while the future forest carbon sink is developing.

Future measures under the EU 2040 Climate Target need to bring the focus on a holistic approach of closer integrating the forest-based value chain – ranging from short-lived to long-lived products in climate policy via the substitution effect of its products via biogenic carbon.

To fully harness the potential of the forest-based bioeconomy to deliver on the 2040 climate target, the new EU Bioeconomy Strategy has paramount importance to deploy forestry's potential in delivering in the interim climate target while ensuring family-owned forestry operations remain an economically viable livelihood and building block of Europe's transition to greater strategic autonomy and renewables-based, resilient and competitive economy.